Head Start Program Information Report

OMB Information Collection Request
0970 - 0427

Supporting Statement Part A - Justification

April 2022
NonSub Change – January 2025

Submitted By:
Office of Head Start
Administration for Children and Families
U.S. Department of Health and Human Services

1. Circumstances Making the Collection of Information Necessary

Section 650 of the Head Start Act (42 U.S.C. 9846) requires that the Secretary of the Department of Health and Human Services (HHS) prepare and submit a report to the Congress at least once during every 2-year period.

Section 641A of the Head Start Act of 2007 (42 U.S.C. 9836A) requires that the Office of Head Start (OHS) collect enrollment information from grant recipients on a monthly basis to determine whether grant recipients maintain their funded enrollment.

Section 644 of the Head Start Act (42 U.S.C. 9839) requires each Head Start agency to make available to the public a report published at least once in each fiscal year.

OHS is requesting an extension, with changes, of the Head Start Program Information Report information collection authority. The following instruments are included in this information collection: (1) the Program Information Report Form (PIR), (2) monthly enrollment, and (3) center locations and contacts.

This January 2025 nonsubstantive change request includes the following updates:

- Updating the eligibility question A.13 to align with the updated Head Start Program Performance Standards by including eligibility options for migrant and seasonal and tribal Head Start programs, as well as those whose income was adjusted for excessive housing costs during the eligibility process
- Revising the race/ethnicity data collection to better align with Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (OMB Statistical Policy Directive No. 15)

The following changes were incorporated through prior approvals and remain:

(1) PIR instrument:

- Changing “grantee” to grant recipient
- Restructuring item C.7 and C.8 to clarify that information collected on chronic conditions is applicable to all children, not only those that were up-to-date at the end of enrollment
- Adding common titles of parenting curriculum for C.31 based on prior year responses received
- New question on Part C agencies in the service area and the total number of formal agreements with those agencies to coordinate services for children with disabilities. We also revised the two related questions on formal agreements to align with the new Part C question.

(2) monthly enrollment:

- Improved definitions for monthly enrollment reporting screen

(3) center locations and contacts:

- New questions on licensing status and participation in their state or local Quality Rating Improvement System (QRIS)

Most of these changes were slight improvements and for clarification purposes. The most significant changes were the addition of the new question on Part C agencies in the PIR instrument and the new questions on licensing and state QRIS participation in the center locations instrument. However, the additions did not add any significant reporting burden since grant recipients are already having to maintain these records as part of meeting existing federal reporting requirements. Therefore, the reporting burden for responding to these instruments are not changed.

2. Purpose and Use of the Information Collection

The PIR data is used for the following principal purposes:

- The information is used for program management at the local, Regional and National levels to analyze trends in the program, including program enrollment, program design, staffing patterns, staff credentials, family demographics and service needs, and access to health and social services and services for children with disabilities. The PIR data is used at the national and Regional levels to inform policy, program development, and planning. As one component of an ongoing monitoring system, the PIR is also used to track implementation of requirements and to promote compliance with applicable laws and regulations governing the Head Start and Early Head Start programs.
- The PIR is a major source of information used to respond to Congressional and public inquiries about Head Start. It is a primary source of information used to compile the Biennial Report to Congress on the Status of Children in Head Start Programs mandated by Section 650 of the Head Start Act.
- The PIR data is used often by Head Start research efforts managed through the Office of Planning, Research and Evaluation, to define Head Start populations and to provide baseline information for planning and design.

Monthly enrollment is primarily used to determine whether grant recipients maintain their funded enrollment (which could initiate an underenrollment process) and to measure the efficiency of Head Start which is included in the Annual ACF Budget Request and are a part of the HHS strategic plan.

Pertinent location information is provided to the public primarily through Google maps at https://headstart.gov/. This data is also used to plan Head Start monitoring reviews. In addition, OHS is requiring that it be informed when certain adverse conditions are present,

such as when grant recipients incur a suspension of service due to a child care licensing violation, when they are added to the CACFP National Disqualified List, etc., in order to provide effective oversight and minimize community service disruptions.

Contact information is collected from key personnel to send correspondence, electronic signatures, and general grant administrative purposes.

This information collection is also used for planning and scheduling of onsite monitoring reviews.

3. Use of Improved Information Technology and Burden Reduction

Information is submitted through the Head Start Enterprise System (HSES). There are no paper transactions. The automated filing provides accurate, edited data. The data on locations, contacts, and program types are prepopulated when possible.

4. Efforts to Identify Duplication and Use of Similar Information

No similar information is available. All three instruments capture data that is only made available through those reports.

5. Impact on Small Businesses or Other Small Entities

Not applicable.

6. Consequences of Collecting the Information Less Frequently

Figures on actual program services would not be available on an annual basis without this information collection such as the percent of children that received their necessary immunizations and the percent of classroom teachers with an associates or higher degree in Early Childhood Education or related field.

Interest in early childhood programs including enrollment and the status of children and families served is ongoing; there is a need for current program information. In addition, the PIR is essential for reporting on performance measures and the implementation of Congressional mandates.

OHS has considered collecting information less frequently than an annual basis, but programs and system developers have indicated it may increase the burden of the collection since having a steady annual collection supports reliable reporting and record-keeping. Additionally, it was indicated that programs need to collect it on an annual basis for their own purposes and having access to data reported by other programs is helpful.

Without PIR data, research studies would have to develop additional information collections to compensate for the missing data. Also, monitoring would need to develop a new method and propose a new data collection for planning and scheduling on-site reviews.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The revisions to the race/ethnicity data collection are updated to align with the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (OMB Statistical Policy Directive No. 15). We currently collect race and ethnicity in the annual Head Start PIR. We are making revisions to align with SPD-15 recommendations which are described as follows with justification:

1. **Only collecting minimum reporting categories, not detailed categories.** OHS proposes only displaying the detailed reporting categories as examples without collecting detailed category data itself, to reduce burden on programs in collecting race/ethnicity information. OHS data system representatives expressed concern that collecting the detailed categories would impose a substantial burden on Head Start programs.
2. **Added "multiracial and/or multiethnic" category for aggregate reporting purposes.** This information collection is designed to be collected at the aggregate program level; we do not collect this data at the individual level. Because OHS does not receive individual-level data on race/ethnicity through the PIR, the "multiracial and/or multiethnic" option has been added to allow for reporting on individuals with more than one race/ethnicity. This avoids issues with duplicate counts in the data which will greatly benefit reports on race/ethnicity of enrollees and staff in the program. To promote alignment with SPD-15, we expect programs to allow families and staff to select multiple races and/or ethnicities and then reassign them to this category. This expectation is also further promoted through the third revision.
3. **Added subsequent question to collect race/ethnicity data for those who identify as more than one race/ethnicity.** To promote programs collecting data on the race/ethnicity identities of those who identify as more than one race/ethnicity while also better understanding the race/ethnicity of multiracial/multiethnic families and staff in programs, we added a subsequent question where programs will report the detailed multi-selected categories for those who are reported in the "multiracial and/or multiethnic" category of the preceding race/ethnicity question.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on January 13, 2022, Volume 87, Number 9, page 2159, and provided a sixty-day period for

public comment. During the notice and comment period, we received three comments. In response to comments:

- OHS did not implement the propose revision to collect the value of average benefits provided to education staff due to concern with associated burden of collecting such information.
- The proposed addition of a column for "unspecified" ethnicity was removed due to concerns raised that this added an unnecessary number of additional reporting categories, one reporting category per race. Instead, the existing category for reporting *unspecified race* was broadened to capture *unspecified race and ethnicity*. The reason for this change is to allow for families and staff that do not identify their ethnicity to be reported in this revised category.
- We are exploring alternative ways to address non-binary parents in question C35 on the PIR to be more inclusive and a change is being considered for the next PIR.

We also consulted grant recipients outside of the federal register notice for additional feedback on proposed changes. We received feedback from a few grant recipients that their QRIS is still in development or did not exist and they would like to be able to report this status. We added an option for the proposed QRIS question to allow for this reporting category. We also received feedback that some programs have one formal agreement in place with multiple Part C agencies to coordinate services, but they would only report this as a count of one. We revised the proposed new question to count the number of Part C agencies in which a formal agreement is in effect to allow for the reporting of the full count of Part C agencies involved in a single formal agreement. This change was also applied to the two existing related questions in that section of the PIR.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

Not applicable.

11. Justification for Sensitive Questions

Not applicable.

12. Estimates of Annualized Burden Hours and Costs

The respondents for this information collection are grant recipients. The number of responses is based on the number of responses provided by each grant recipient for each information collection instrument, while also taking into account that some grant recipients hold multiple grants.

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Head Start PIR	1,600	2.25	1	3,600	$52.82	$190,152
Monthly Enrollment	1,600	27	0.05	2,160	$52.82	$114,091
Center Locations and Contacts	1,600	15	0.25	6,000	$52.82	$316,920
Estimated Annual Burden Total:				11,760	**Estimated Annual Cost Total:**	$621,163

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Education and Childcare Administrators in Preschool [11-9031] and wage data from May 2020, which is $26.41 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $52.82. The estimate of annualized cost to respondents for hour burden is $52.82 times 11,760 hours or $621,163.
https://www.bls.gov/oes/current/oes_stru.htm

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There is no other cost burden on respondents. Respondents are not required to establish any special or new recording keeping systems. Data for the PIR is drawn from established records which would otherwise be compiled in conforming to the requirements of the Head Start Program Performance Standards (HSPPS) such as enrollment and family records, staffing and employee turnover, and program characteristics. Response does not require the use of outside resources. The record-keeping burden associated with the HSPPS are already covered under OMB # 0970-0148.

14. Annualized Cost to the Federal Government

The estimated annual cost to the Federal government is $1,733,600. Federal staff costs are estimated to be 30% of the time of a Program Specialist (GS-14) to oversee the activities of the data contract and to be the lead for reports and responding to inquiries. Additionally, contract costs for maintaining and updating the PIR data and reporting system are included.

15. Explanation for Program Changes or Adjustments

The burden table has been updated to better reflect the grant recipient as the respondent. The burden hours were increased for the monthly enrollment reporting based on feedback from grant recipients on the burden in responding to the monthly enrollment, in particular during

emergency response (e.g., pandemic and natural disasters). No other burden adjustments were made.

16. Plans for Tabulation and Publication and Project Time Schedule

Annual National and Regional Fact Sheets on Head Start and Early Head Start are produced and published online. A biennial report to Congress and various Regional, State, and site level pre-programmed reports draw information from the PIR data. State and site level reports are important for program monitoring and measuring performance. PIR data reports and extracts are available to all Head Start programs and to the public. Reports using PIR data and how to access PIR data located on HSES is available on the OHS website for the public at https://eclkc.ohs.acf.hhs.gov/data-ongoing-monitoring/article/program-information-report-pir. PIR data in HSES are made available soon after the reporting deadlines and are automatically updated as PIR corrections are submitted. No complex analytical techniques are contemplated.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.