

Head Start Program Grant Application

**OMB Information Collection Request
0970 - 0207**

Supporting Statement Part A - Justification

April 2022

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

Sections 641, 641A (codified at 45 CFR 1301 to 1305), 642 to 645A, 648A, 653 to 657A of the Head Start Act (the Act) prescribes requirements eligible entities must meet in order to receive funding under the Act. Applicants are required to demonstrate that they are or will meet Head Start requirements when submitting applications for funding under the Act.

This request is for an extension with changes. The changes include additional system infrastructure for grantees applying for funds specifically related to facilities which includes a document repository for uploading supporting documentation into the system. The changes made do not impose new information collection requirements since grant recipients were already required to provide this documentation to apply for funding related to facilities as part of meeting federal requirements and the changes only provide a better structure to submit such information.

2. Purpose and Use of the Information Collection

The information submitted by applicants primarily assist program and grant officials in determining whether the applicant meets the requirements for funding under the Act including any requirements specified in annual appropriations by Congress prior to the issuance of a notice of award. Secondary uses include to inform internal-decision making when possible (e.g., approaches to funding for increased program hours based on currently approved program schedules) and to supplement data reported to the public and congress on funded enrollment and general directory information about the grant recipient agency (e.g., agency type and administrative address).

3. Use of Improved Information Technology and Burden Reduction

Applicants submit this information electronically.

4. Efforts to Identify Duplication and Use of Similar Information

Information submitted by applicants is not duplicated in other information collection activities. Additionally, there are areas in the system that are prepopulated if any information has been previously provided such as the agency name, congressional district, agency type, and address.

5. Impact on Small Businesses or Other Small Entities

Not applicable.

6. Consequences of Collecting the Information Less Frequently

Without this information collection, there would be no mechanism for Head Start funding applicants to demonstrate how they are and will meet applicable federal requirements for a given budget period in a fiscal year.

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

Not applicable.

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 10, 2022, Volume 87, Number 6, page 1150, and provided a sixty-day period for public comment. During the 60-day notice and comment period, no comments were received. A subsequent notice was published allowing thirty days for public comment (87 FR 44168). During this second comment period, a public comment was received requesting all Head Start program grant application forms to require grantees to demonstrate a commitment to worker organizing, collective bargaining, and union engagement. This request was not incorporated. Head Start funds cannot be used to assist, promote, or deter union organizing in accordance with Section 644 of the Head Start Act.

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 level of grant application activity as a result of recent appropriations while also taking into account that some grant recipients hold multiple grants. The average burden hours per response takes into account both full application submission and applications where only a subset of information is collected from the respondent.

Information Collection Title	Total Number of Respondents	Total Number of Responses per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Grant Application	1,600	2.5	25	100,000	\$52.82	\$5,282,000
Estimated Annual Burden Total:				100,000	Estimated Annual Cost Total:	\$5,282,000

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 100,000 hours or \$5,282,000.

https://www.bls.gov/oes/current/oes_stru.htm

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

No additional costs.

14. Annualized Cost to the Federal Government

The estimated annual cost to the Federal government is \$7,887,500.

This amount includes the annualized staff costs associated with reviewing and approving applications submitted under this information collection are estimated at about 25% of 230 staff at GS-12 and GS-13 levels across all 12 regional offices at an average \$85,000 salary for a total of \$4,887,500. Additionally, this amount includes the costs associated with the system development and maintenance needed to support the electronic processing of applications at about \$3,000,000.

15. Explanation for Program Changes or Adjustments

The burden has been adjusted to reflect the increase in applications being required by grantees in response to increased funding appropriated by congress such as one-time funding in response to COVID-19, quality improvement, and duration (i.e., increased program hours). The burden has also been adjusted to account for the increase in agencies that have multiple grants which results in agencies having to submit annual applications for each grant. When possible, grant applications are combined when they are within the same grant to limit the number of grant applications being submitted. Additionally, when separate applications are required, the supplementary funding applications are abbreviated, or fields are pre-filled to reduce burden. The burden table shows an average burden across all grant recipients, but there is variance in the level of burden per application and respondent based on these factors.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no plans to publish the information submitted.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.