

**To:** Kelsi Feltz  
Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

**From:** Priscilla Hodge  
Office of Head Start  
Administration for Children and Families (ACF)

**Date:** January 23, 2024

**Subject:** NonSubstantive Change Request – Head Start Grant Application (OMB #0970-0207)

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This memo requests approval of nonsubstantive changes to the approved information collection, Head Start Grant Application (OMB #0970-0207).

### ***Background***

The Head Start Grant Application collects information from all Head Start and Early Head Start grant recipients for Head Start funding including program budgets and narratives. The information is collected on an annual basis when grant recipients apply for their annual funding. OMB most recently extended this information collection under OMB #0970-0207 with changes and the current expiration date is June 30, 2025.

Prior to receiving annual Head Start federal funds, Head Start grant recipients must complete a grant application package which includes Head Start Grant Application tabs in the Head Start Enterprise System (HSES), an application and budget justification narrative, and upload other applicable documents. The Office of Head Start has identified nonsubstantive changes to the Head Start Grant Application to provide clarifications; ensure alignment with [ACF-IM-HS-22-09 Enrollment Reductions and Conversion of Head Start Slots to Early Head Start Slots](#); and provide additional descriptions, tips, and reminders to improve the overall quality of applications.

### ***Overview of Requested Changes***

The proposed nonsubstantive changes are outlined below.

Based on common questions and/or challenges in completing the existing Head Start Grant Application, OHS is proposing several clarifications, including rephrasing, and providing additional context and/or examples. Such clarifications will not require grant recipients to provide new information but will further clarify existing items. Clarifications include:

- Information on how [ACF IM HS 19-04 Accounting Simplification for Head Start and Early Head Start](#) applies to Head Start Grant Application
- Example of a scenario in which a recipient would submit baseline application after receiving a grant through the competitive process
- Examples of situations in which recipients may submit a shortened budget period
- Statement that *Program Goals* include *School Readiness Goals* and that there should be at least one goal in each of the five domains

- Statement that the use of the program goals template is optional
- Further clarification on what evidence should demonstrate as it relates to service and recruitment area
- Additional information on what should be included in the discussion of how program option(s) meet the needs of children and families
- Condensing the Change in Scope section and clarifying that enrollment reductions and/or conversions requests must address considerations in [ACF-IM-HS-22-09 Enrollment Reductions and Conversion of Head Start Slots to Early Head Start Slots](#)
- Further clarification that populations in greatest need include those that been historically marginalized
- Link to definition of equipment (45 CFR §75.2) and clarification that each item must identified individually in the budget

Addition of descriptions for documents that must be uploaded as part of the existing Head Start Grant Application:

- Results of Self-assessment and Improvement Plan
- Selection criteria
- Annual Report to the Public
- Other supporting documents

Addition of the following reminders and/or tips:

- Locally Designed Option qualifies as a Change in Scope request in HSES
- “Program Schedule” in HSES must reflect proposed enrollment levels
- Recipients are encouraged to review [How Head Start Services Can Improve Outcomes for Birthing Parents](#) to help staff understand the significant health disparities in maternal and infant birth outcomes
- Governance screenings must be conducted within 60 calendar days of the project period
- Partnership contracts must be entered in line “8. Other Contracts” on the budget tab
- Contracts and single line-items over \$250,000 in “Other” budget category must include explanation of services to be provided
- Equity considerations throughout

OHS is proposing the addition of follow-up questions to improve the utility of information already being requested. Such additions are in scope of the main question and will help grant recipients address sections more concisely and succinctly, reducing the need for further discussions after the application has been submitted. Addition of follow-up question on the following sections in the existing Head Start Grant Application:

- Needs of Children and Families— follow-up question around steps taken to prioritize equity in selection criteria
- Locally Designed Option— follow-up questions on number of slots, centers, and classrooms in which locally designed option waivers would apply and how locally designed option would support populations identified in selection criteria
- Human Resource Management—follow-up question on staff compensation
- Program Management and Quality Improvement—follow-up question on internal controls
- Budget— follow-up questions on staff compensation and use of training and technical assistance funds

- Continuation Application— follow-up question requiring an explanation in situations where there are no updates or changes to service delivery in a continuation application

OHS is proposing the removal of questions that have little to no utility. However, removal of such questions will not change the overall purpose and use of the information collection.

Questions are on the following:

- Financial and property management systems

The proposed changes are not expected to substantively impact the burden estimate since the burden of submitting the Head Start Grant Application are already considered by the existing information collection and most changes are added clarifications, descriptions, reminders, and tips. While the proposed changes include additional follow-up questions, several questions were condensed and rephrased for clarity and/or removed from the Head Start Grant Applications.

### ***Time Sensitivities***

To ensure an equitable rollout of the updated Head Start Grant Application, the proposed changes would be effective for Fiscal Year 2025 funding. This would ensure that all Head Start recipients use the same Head Start Grant Application for Fiscal Year 2025 (FY25). Head Start grant recipients receive guidance on completing their annual funding applications 6 months in advance of their annual funding date. Funding guidance for recipients funded in October 2024 (FY25) must be sent to recipients in April 2024. To ensure there is enough time to rollout changes in advance of April 2024, we are requesting approval of the request in early March 2024.