

Head Start Program Grant Application

OMB Information Collection Request

0970 - 0207

Supporting Statement Part A - Justification

July 2025

Type of Request: Reinstatement with Changes

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. To receive Head Start funding, Head Start grant recipients must apply for such funds. The Head Start Grant Application is used by the Office of Head Start to gather the necessary information from eligible entities applying for Head Start funding. This collection targets current Head Start grantees submitting non-competitive applications, including those applying for baseline funding (first year of a new grant period) and continuation funding (subsequent years in a project period).

The information is collected electronically through the Head Start Enterprise System (HSES), where applicants complete several required tabs: Program Schedule, Budget, Other Funding, SF-424A, SF-424, and Documents. Within these sections, grantees provide detailed information about their program design and approach to service delivery; governance, organizational and management structures; and budget. For baseline applications, submitted once every 5 years, grantees must submit a program narrative covering ten key service areas: service and recruitment area, needs of children and families, program options, eligibility and recruitment, education and child development, health services, family and community engagement, disability services, transition services, and transportation. They must also address governance, human resources, and program management. While previously required annually for both the baseline and continuation applications, the program narrative is no longer required for continuation applications which recipients submit 4 out of the 5 year grant cycle.

The information submitted by applicants 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. Applicants are required to demonstrate that they are or will meet Head Start requirements when submitting applications for funding under the Act.

ACF has identified changes to reduce the burden of these requirements related to documentation while still meeting the requirements under the Act. The updated grant application reduces the amount of documentation required from grant recipients, both in the baseline application and the continuation application, by reducing the amount of required documents to support the application and reducing the amount of required information in the program and budget justification narrative. The updated grant application no longer requires recipients submitting a continuation application to include program narratives. Program narratives are only required for baseline applications, which are submitted once every five years. The questions that must be addressed as part of the program narrative have also been reduced. In addition, recipients are no longer required to submit the results of the self-assessment and improvement plan, training and technical assistance plans, annual reports to the public, or program goals. The updated grant application instructions also reduce the page limit by half. The goal of these changes is to reduce grant recipient burden.

2. Purpose and Use of the Information Collection

The information submitted by applicants primarily assists 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).

This information is collected to ensure grantees are meeting Head Start program requirements and using federal funds appropriately. The Office of Head Start analyzes each application to determine if the recipient's proposal is reasonable, allowable, and allocable before issuing a Notice of Award. The collection helps maintain accountability for approximately \$10 billion in annual Head Start funding while ensuring programs are responsive to community needs and delivering high-quality services to children and families.

The changes made to this information collection reduces the amount of documentation required from grant recipients, both in the baseline application and the continuation application, by reducing the number of required documents to support the application and reducing the amount of required information in the program and budget justification narrative. The goal of these changes is to reduce grant recipient burden.

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 May 15, 2025 (90 FR 20677) and provided a sixty-day period for public comment. During the notice and comment period, five comments (four substantive and one nonsubstantive) were received.

The comments received expressed support for the proposed reduction in documentation required.

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

Estimated Burden Hours

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. This updated grant application reduces the amount of documentation required from grant recipients, both in the baseline application and the continuation application, by reducing the amount of required documents to support the application and reducing the amount of required information in the program and budget justification narrative. The updated application also cuts the page limit by 50% to align with the reduction in the amount of information required from the recipient.

Estimated Cost to Respondents

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 2024, which is \$30.12 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$60.24. The estimate of annualized cost to respondents for hour burden is \$60.24 times 64,000 hours or \$3,855,360.

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

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
Grant Application	1,600	2	20	64,000	\$60.24	\$3,855,360

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

No additional costs. Respondents are not required to establish any new recordkeeping as a result of this information collection.

14. Annualized Cost to the Federal Government

The estimated annual cost to the Federal government is \$7,707,300.

This amount includes the annualized staff costs associated with reviewing and approving applications submitted under this information collection are estimated at about 25% of 143 staff at GS-12 and GS-13 levels across all OHS offices, plus about 15 contractor staff, at an average \$92,300 salary for a total of \$4,707,300. 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 reduction in the amount of documentation required from grant recipients in both the baseline application and the continuation application. Specifically, this reflects the reduction of 6 documents for the continuation applications and 5 documents for the baseline application. In addition, this reflects the removal of the required program narrative for continuation applications and an overall reduction of questions asked throughout both the continuation and baseline applications. The updated instructions have been streamlined and by cutting the page limit in half, the burden on grant recipients has been reduced.

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.