

November 17, 2025

Office of Head Start  
Office of Planning, Research, and Evaluation  
300 C Street, SW  
Washington, D.C. 20201  
Attn: Mary C. Jones, ACF/OPRE Certifying Officer

**SENT VIA EMAIL:** [infocollection@acf.hhs.gov](mailto:infocollection@acf.hhs.gov)

RE: Comments on the Proposed Information Collection Activity; Head Start Program Information Report (OMB #0970-0427)

To Whom It May Concern:

On behalf of the Head Start community, thank you for the opportunity to comment on the Proposed Information Collection Activity; Head Start Program Information Report (OMB #0970-0427). As a program which has been extensively studied over a 60 year history, and which systematically uses data to drive quality improvement, Head Start welcomes the opportunity to continue to explore potential improvements to required data collection.

We appreciate the important data that the Program Information Report (PIR) collects and we believe that consistent and comprehensive reporting is critical to efficient program administration. As requested in this information collection, we are writing with feedback on both the proposed revisions to the 2026-27 PIR and the proposed future information collections.

#### Proposed Revisions to 2026-27 PIR

The proposed changes to the 2026-27 PIR revise language and clarify definitions to make the PIR more accurate. We appreciate these proposals and generally support these changes without comment.

However, we are concerned about and encourage OHS to remove the addition of the "Waiting List Total" field in monthly reporting. We understand that OHS would like information on programs' waitlists as part of its efforts to support enrollment nationwide. However, the field as described will not provide enough relevant information to add meaningful value. Waitlist total as a single number lacks sufficient useful insight or context as to the true status of a program's recruitment efforts and enrollment status. For example, it does not account for the fact that a program may have a substantial waitlist, but it is filled with over-income children who cannot be slotted into any current vacancies in the program. Similarly, all the children on a waiting list may

only be willing to enroll at a specific site that does not have any open slots, even while slots at another center are vacant. Without this context, the waiting list data would be inconsistent and misleading, which in turn could result in erroneous conclusions. In order to counter this, OHS would have to ask agencies for significantly more detailed information (such as why individual children on the list are unable to be moved into open slots) and this would create a significant additional reporting burden.

Therefore, we oppose the proposed addition of the “Waiting List Total” field to the monthly enrollment report.

### Proposed Future Information Collections for the PIR

We greatly appreciate the effort OHS put into developing these proposed future PIR changes, and that the Head Start community is being given an opportunity so early in the process to review them and provide feedback. We provide more detailed comments below on each section of proposed changes, but first highlight our overall concerns.

In general, the PIR is already a significant reporting burden for programs each year, and through our conversations with programs and our own work with the PIR data, it is clear that the quality of the data reported varies significantly. The more that gets added to the PIR, and the more complex the information it is requesting, the greater the reporting burden becomes and the lower quality we can expect of the data provided. Most of these proposed changes are on complex topics, and while we understand OHS’s desire for better information in these areas, the added reporting burden would be far too significant to justify the changes, particularly if there is no significant reduction in reporting in other parts of the PIR.

Additionally, some of the proposed changes raise concerns about the quality of the data that would be collected, resulting in unintended implications for Head Start, as well as unnecessary duplication of effort.

#### *Child Turnover & Transitions*

**OHS requests feedback on whether programs collect information about why children are leaving the program and where children are going to receive services when they leave Head Start Preschool or Early Head Start programs. OHS requests feedback on the level of burden to collect this information.**

Based on conversations with programs, we find that many Head Start programs collect this data to the extent possible. However, they report that this information is often incomplete and is therefore limited in its usefulness. Whether families leave in the middle of the year or don’t re-enroll in the subsequent program year, many simply leave the program without providing information on where the child is headed next. To a certain extent, this is not surprising—low income families and young parents are more likely to be highly mobile, moving from one living arrangement to another in short periods of time. Given this, we don’t believe it will be valuable

for OHS to require the collection of detailed data on why children are leaving and where they are going.

**OHS also requests feedback on how programs would prefer this information be collected or categories that should be included when collecting data to align with what programs already collect or understand on child turnover and transition.**

While collecting and reporting where children are going and why is unlikely to produce valuable data, we do believe it is possible for programs to use the timing of a child's departure from the program to differentiate between turnover and transition, as described by OHS. It is our understanding that programs are already consistently collecting this information or could easily change the way they track it to make reporting easier. Therefore, programs could reasonably report counts of the number of children who left during the program year and those who left at the end of the program year without significant additional burden.

### *Personnel*

**How would programs be able to report this information to OHS? Would it be possible to report this information in the PIR?**

As OHS has identified, a great deal of personnel data is captured in systems outside those programs commonly use to report the PIR. Therefore, as is often happening already, programs would have to go to a different system to get this information and enter it manually in the PIR system.

Some programs have noted that the systems they currently use do not handle role transitions particularly well, often losing historical data if a staff person switches roles within the program. As a result, programs need to do significant manual work to report on personnel data, and it would create a significant burden to report on staff roles, salaries, and turnover as OHS describes and there would likely be notable inaccuracies in the data.

When it comes to whether it would be possible to report this information in the PIR, we do not believe that the three personnel categories suggested in this information collection could be reported on with fidelity and therefore do not support the changes proposed.

Additionally, we note that programs already provide staffing organization charts to OHS as part of their grant application, and OHS could pull valuable information on staffing counts from these charts without requiring duplicative and additional work from programs.

**OHS acknowledges that the changes described above are significant. How much time do programs need to prepare to collect and report staffing-related data to OHS, and why? Please take into consideration time needed for training staff on aggregating this data, pulling necessary data reports, and providing this data to OHS.**

We do not have any specific comments on how much time programs would need to prepare to collect and report this staffing-related data, but we feel strongly that this data cannot be collected and reported on with enough quality to justify any level of additional burden.

**Considering all of these proposed changes related to personnel data, are there any challenges in reporting on positions that have multiple roles? For example, this could include a facility manager who also supports nutrition services, or a position that supports both transportation and nutrition services.**

Staff holding multiple roles is commonplace in Head Start, adding significant complexity to any potential reporting on hours of labor, turnover rates, and salary information. OHS has not been clear on how it would like programs to account for the distribution of hours and salary when staff do hold multiple roles and we do not see a clear way to do so that would result in usable data. In cases where staff hold multiple roles, turnover data in particular aggregated at the national level could be quite misleading when it comes to summed totals vs. rates by role.

Another layer of difficulty comes in when we consider salaried staff, as they typically do not report hours the same way hourly staff do, creating further confusion and inaccuracies when it comes to reporting hours of labor for staff holding multiple roles.

It is already an issue in the PIR when staff work across multiple grants (e.g. program leadership and administrative staff) and are therefore counted multiple times, leading to significant inaccuracies just in the number of staff employed by Head Start. As the data gets more complex from there, the reporting burden and data inaccuracies will only continue to grow. Therefore, we do not support the proposed changes.

**Are there any concerns with how to report the information outlined above related to positions that are funded through multiple funding streams? Specifically, how would programs parse out the full-time equivalency for positions that are funded in part by Head Start and in part by other funding streams?**

Because of the flexibility in program design in Head Start, we do not believe it is possible to identify one consistent way for programs to parse out full-time equivalency, or any of the other data points suggested in this information collection. Programs leverage multiple funding sources in many different ways. For example, in some programs, none of the staff salaries are paid using Head Start dollars; instead, a partner employs and pays all staff while Head Start covers all of the other costs. For other programs, this scenario is completely reversed. Head Start's uniqueness in program design, which is a strength overall, unfortunately makes this data too difficult to report consistently.

**Do the labor categories as proposed in our definition align with how programs categorize personnel in their program and report to payroll companies or state labor agencies?**

We have no additional comments here.

### *Transportation*

We recommend that OHS completely eliminate transportation data from the PIR. Over the years, as programs have had to do more with less, providing transportation has consistently been scaled back or eliminated completely. Today, few programs offer robust transportation services to families, and many are not able to offer any transportation at all. In fact, according to the 2024 PIR, programs only reported providing transportation for 13% of children served.

If it is important to OHS to understand what transportation services are provided, to whom, and the other data points described in this information collection, we believe it would be best to speak to programs individually about their unique service method rather than include these questions in a national reporting requirement.

### *Layered Funding*

We strongly support the flexibility inherent in Head Start that allows programs to layer funding in a variety of creative ways. However, similar to the complexity described in the personnel section, the collection of consistent, high-quality data from Head Start programs on their layering of funding is too complex to be accurately captured by the PIR. Each Head Start grant recipient is so unique in their program design, that it would be incredibly difficult to develop a reporting structure that would accurately represent most, if not all, programs while also taking into account the administrative burden inherent in such a requirement. We believe that, at most, programs could report on what other funding sources they leverage to support their children and families, but any more detailed data points would be too burdensome and inconsistent to report.

A significant concern for the data points OHS has proposed is that many grant recipients delegate or sub-grant services to other organizations. Many who do delegate services do not receive the level of detail OHS is proposing back from their partners, and in order to do so, they would need to amend contracts with each of their partners, which would place an immense burden on these programs.

Finally, as Head Start is forced to contemplate a third straight year of flat funding, despite rising costs for overhead and personnel, grant recipients have been pushed to become ever more creative with ways to cut costs and improve efficiency. Adding the administrative burden inherent in this proposal, while well intentioned, will be a move in the opposite direction. To be clear, we support data-driven practice and have long focused on efforts to continuously improve using data as the backbone for critical decisionmaking.

Layered funding is one of the creative approaches Head Start grantees have used both to stretch dollars but also to increase the number of children able to be served by the Head Start model. This creativity should be recognized, not penalized with additional administrative burdens that serve limited purpose.

#### *IEPs and IFSPs*

**Is there additional information that can be provided to the Office of Head Start to better understand why children are not receiving an evaluation or why they are being referred but not being found eligible for an IEP or IFSP under IDEA?**

There is general consensus in the Head Start community that the main driving force behind the “pending but not yet completed” evaluations is largely out of Head Start programs’ control. Receiving an evaluation is a lengthy process, with timelines driven by LEAs. For example, it is not uncommon for a Head Start program to refer a child for evaluation under IDEA, only to have the LEA not complete the process before the end of the program year. Similarly, LEAs are responsible for the final determination of a child’s eligibility for an IEP or IFSP under IDEA; Head Start programs merely make the referrals based on screening results and attempt to push the process forward, but have very little control on the screening tool’s guidelines or the LEAs final determination.

If OHS is interested in a deeper understanding, we propose that OHS incorporate this into FA1 and FA2 reviews rather than the PIR. This would give programs the opportunity to speak directly to their specific experience with their LEAs, any local considerations at play, and what their internal processes look like in this area. This will give a more accurate and detailed picture of IEP and IFSP experiences as it relates to specific grant recipients without requiring an additional overall reporting burden.

#### *Clarity of Definitions*

No comments.

#### *License IDs*

**OHS requests comments on this proposed change described above to enter the license ID on the Center Information reporting screen.**

While the proposal to enter license IDs on the Center Information Reporting Screen is not excessively burdensome, it is entirely duplicative of requirements found elsewhere, thereby running counter to HHS objectives with respect to administrative simplification. As OHS notes, programs already upload licensing documentation that frequently includes the license ID. Requiring programs to also enter the data manually introduces unnecessary room for error. For programs that are not required to be licensed by their state, this proposed change would

further existing confusion around license-reporting requirements. We are also unclear as to what purpose or benefit is accomplished by having the typed values that is not already accessible through the uploaded documentation.

Thank you again for the opportunity to provide feedback on the proposed changes to the PIR. We remain committed to data-driven practice, as well as program transparency, and urge you to strike a fair balance between data collection and administrative burden.

Sincerely,

**National Associations:**

National Head Start Association  
National Indian Head Start Directors Association

**State and Regional Associations:**

Alaska Head Start Association	New England Head Start Association
Arizona Head Start Association	New Jersey Head Start Association
Delaware Head Start Association	New York State Head Start Association
Florida Head Start Association	Ohio Head Start Association
Head Start Association of New Mexico	Oregon Head Start Association
Head Start California	Pennsylvania Head Start Association
Illinois Head Start Association	Region VI Head Start Association
Indiana Head Start Association	Virginia Head Start Association
Kansas Head Start Association	Washington State Association of Head Start and ECEAP
Kentucky Head Start Association	West Virginia Head Start Association
Massachusetts Head Start Association	Wisconsin Head Start Association
Missouri Head Start Association	
Montana Head Start Association	