

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

**From:** Nekeya O'Connor, Fiscal Specialist  
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Administration for Children and Families (ACF)

**Date:** April 6, 2026

**Subject:** Change Request – Generic for ACF Program Office Monitoring Activities (OMB #0970-0558)

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This memo requests approval of changes to the approved information collection, the instrument entitled Office of Head Start Disaster Recovery Improper Payment Reviews under the Generic for ACF Program Office Monitoring Activities” Office of Management and Budget (OMB #0970-0558)

### ***Background***

This information collection has been used since fiscal year 2017 for the monitoring of improper payments in Head Start disaster recovery federal funding.

Due to an assessment of risk with improper payments and significant increase in funding to Head Start programs, OHS is required to implement improper payment reviews for all Head Start funding sources per Title 2, Code of Federal Regulations (CFR), Part 200, Subsection 300, "Statutory and National Policy Requirements".

Respondents complete two instruments as part of the monitoring process. Recent review of the approved materials under this information collection identified the need to add the Phase One tool for approval.

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

We are adding the Phase One tool that is accompanied with the data validation tool (DVT) instrument. The Phase One tool is used to collect the transaction level data from the recipients to perform the sample selection of Phase Two. The tool requires recipients to list expenditures for each grant identified as the part of the review.

While a newly formatted tool is being submitted for Phase Two, this collects the same information that was previously approved.

The DVT will support the reduction of effort, from both federal and contract staff, to address errors identified in transaction level data submitted as a part of the review.

- During Phase One of the reviews, there were over 100 instances where recipients submitted transaction level data that did not equal the total drawdowns made during FY24. These instances not only highlighted the significant need to support recipients

throughout the fiscal year in tracking expenses but also delayed the completion of the review. The DVT is a tool that automatically checks the quality of Improper Payment Review submissions, flagging missing or incorrect data and providing guidance so any concerns can be resolved expeditiously. OHS aims to reduce unknown payments by preventing submissions from being lost to data issues or unresolved back-and-forth, saving time for recipients, staff, and IP Review administrators.

The burden table in the submission form has been updated to reflect that respondents complete both the Phase One and Phase Two instruments as part of their submission.

***Time Sensitivities***

This approval is required for the implementation of improper payment reviews not related to disaster recovery and will be implemented this summer to report data to OMB by the end of this fiscal year.