

March 10, 2022

Office of Head Start
Office of Planning, Research, and Evaluation
300 C Street SW
Washington, D.C. 20201
Attn: OPRE Reports Clearance Officer

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

On behalf of the Head Start community, the National Head Start Association (NHSA) thanks the Office of Planning, Research, and Evaluation (OPRE), Administration for Children and Families (ACF), and U.S. Department of Health and Human Services (HHS), for the opportunity to comment on the proposed Information Collection Activity—Head Start Program Information Report (OMB #0970-0427).

NHSA is a nonprofit organization committed to the belief that every child, regardless of circumstances at birth, has the ability to succeed in life. NHSA is the voice for more than one million children and their families, 250,000 staff, and 1,600 Head Start programs.

NHSA appreciates the important role that the Program Information Report (PIR) plays in supporting oversight activities of Head Start programs, and we believe that consistent and comprehensive reporting is critical to efficient program administration. However, some of the changes in the proposed information collection will lead to time-consuming confusion and administrative hassle at Head Start programs without producing much helpful information. We hope that you will consider clarifying or removing the following changes to avoid this unnecessary burden.

Ethnicity and Race

The proposed information collection indicates that starting in program year 2022-2023, the Ethnicity and Race section of the PIR will include an additional column allowing respondents to select “Unspecified” as opposed to “Hispanic or Latino origin” or “Non-Hispanic or Non-Latino origin”. We appreciate HHS’s effort to encompass the widest variety of races and ethnicities, but the addition of this column is inconsistent with the U.S. Census, which the PIR claims to follow. The [2020 Census Questionnaire](#) addressed race and ethnicity in separate questions and did not offer an “Unspecified” answer choice. In its [results](#), the Census only reported responses for the two choices offered, declining to report how many respondents chose not to select one of those answer choices.

Head Start programs recently changed their procedures for collecting race and ethnicity information due to changes in the 2020-2021 PIR, and they should not be required to change them again without good reason. We do not see a compelling reason supporting the proposed changes, since they are inconsistent with the U.S. Census. Therefore, we would not recommend proceeding with these changes.

Average Salary and Benefits

The proposed information collection also indicates that starting in program year 2022-2023, the Average Salary and Benefits section of the PIR will include an additional column for the average benefit costs for each staff category. There was no justification provided for this change and no guidance on how programs should calculate Average Benefits. We assume the goal is to better understand employee compensation, but this change will pose an enormous administrative burden on Head Start programs. Calculating the

average benefit costs for 18 different benefits for certain groups of employees within their workforce will be incredibly time-consuming for HR and finance professionals at Head Start programs.

We also ask for guidance on calculating Average Benefits, since the data's usefulness will be severely limited if programs cannot calculate it consistently across the country. There are several questions that arise without this guidance, all of which stand to significantly complicate how this information is collected. These questions include:

- Should programs calculate Average Benefits based on actual costs or budgeted costs?
- Should programs include optional benefits?
- Can Head Start programs use their fringe rate to calculate Average Benefits?
- For benefits that include an employer and employee share, what should be included in the calculation?
- If a program offers three levels of insurance, should its calculation assume that all employees will opt in to the most expensive insurance plan?

In the end, we believe this question is far too complex and burdensome for programs and the change should not be made. If OHS insists on adding the question, we strongly encourage that guidance be added and the information collected should be as simple and straightforward as possible.

Thank you again for the opportunity to provide feedback on the proposed collection for the Head Start PIR. We believe that research and continuous learning are the core of Head Start's ability to serve our nation's most vulnerable children and families with the highest quality of care and service. If you have questions, please contact me at yvinci@nhsa.org.

Sincerely,

A handwritten signature in cursive script that reads "Yasmina Vinci".

Yasmina Vinci
Executive Director
National Head Start Association