

SUPPORTING STATEMENT

A. Justification

1. Information Collection

The Child Care Bureau, Administration for Children and Families requires grantees to report annual child care data on services provided to children and families through the Child Care and Development Fund (CCDF). States must submit an aggregate annual report and a case-level quarterly report, as required by Section 658K of the Child Care and Development Block Grant Act (CCDBG). However, Tribes are not required to meet State reporting requirements. Instead, Tribes are required to report annual aggregate data on children and families served in tribal programs on the ACF-700 report form. This report is required by sections 98.70 and 98.71 of the CCDF Final Rule (45 CFR Parts 98 and 99). This information will be included in the Secretary's report to Congress, as appropriate, and will be shared with all Tribal Lead Agencies to inform them of CCDF or CCDBG-funded activities in other tribal programs.

2. Purpose of Information

The purpose of this collection is to obtain data from Child Care and Development Fund (CCDF) tribal grantees that are required by the Child Care and Development Block Grant (CCDBG) Final Rule (45 CFR Parts 98 and 99). This report provides data regarding the Tribe's efforts to provide affordable and quality child care using CCDF and CCDBG funds. The data also document the numbers of children and families served across all tribal child care programs, as well as the types of child care settings used. This information assists the Child Care Bureau in determining trends and possible technical assistance needs for tribal CCDF grantees. Another function of this information is to determine if Tribes are operating in accordance with their approved CCDF two-year plans, when compliance issues occur.

3. Information Technology

Tribal Lead Agencies can utilize automated collection techniques or other forms of information technology. Beginning in 1999, Tribes were provided the option to submit their ACF-700 data through an internet-based submission website. Since that time, electronic reporting has doubled. Thirty-eight percent (38%) of the Child Care Bureau's 260 Tribal Lead Agencies submit their ACF-700 report form electronically through the ACF-700 internet submission website: <https://extranet.acf.hhs.gov/acf700/login/login700.jsp>. Note that 35 of the 260 Tribal Lead Agencies are not required to submit an ACF-700 report since they are Public Law 102-477 grantees submitting one combined report. Information and on-line technical assistance support related to the ACF-700 internet submission is also available at: <http://www.acf.hhs.gov/programs/ccb/ta/ccarc>.

Tribal Lead Agencies may also submit a hard copy of the ACF-700 report, but are encouraged to submit the report using compatible electronic media, including diskettes or email attachments. The ACF-700 form may be downloaded in electronic format from the Child Care Bureau's website at <http://www.acf.dhhs.gov/programs/ccb/law/guidance/current/pi0602/ccdfacfp0602.xls>. A *Tribal Annual Report: Guide for CCDF Tribal Lead Agencies (ACF 700)* is updated each year, and provides step-by-step technical assistance to help Tribal Lead Agencies complete the ACF-700 form. This Guide is available on the Child Care Bureau's website at:

<http://www.acf.hhs.gov/programs/ccb/report/formhelp/acf700/helpdocs/700guide.doc>.

4. Duplication Information

There is no similar information already available.

5. Small Entity Burden

The collection of the information does not involve small businesses or other small entities.

6. Frequency of Information Collection

This information is collected annually as required by 45 CFR 98.70(c) of the Child Care and Development Block Grant (CCDBG) Final Rule which was published on July 24, 1998.

7. Special Circumstances

The collection of information will be conducted in accordance with 5 CFR 1320.6.

8. Consultation

The Child Care Bureau's notice soliciting comments on this information collection was published in the Federal Register on September 5, 2007, at Volume 72, Number 171, pages 50970-50971. No official public comments were received in response to this notice.

The Child Care Bureau routinely has consulted with Tribal grantees regarding their needs as related to the CCDF reporting requirements which are in part represented by the ACF-700 Report. Although it has recently been discontinued in lieu of quarterly conference calls with all tribal grantees, the CCB regularly met with members of the Tribal Work Group (established in 1990) to obtain comments and suggestions about the ACF-700 data elements and the format of the report itself. Based on those recommendations over the last decade, language in the report has been modified to further clarify the intent of the items and the required responses.

An additional outcome of that ongoing consultation was the development of the *Child Care Data Tracker*. The *Tracker*, a case management software tool, was designed to assist Tribal Lead Agencies with case management functions, such as tracking family and provider information. The *Tracker* also has the capability of generating a completed ACF-700 report automatically based on information grantees enter into the software. The *Tracker* was officially introduced at the 7th National American Indian and Alaska Native Child Care Conference in Kansas City, Missouri, in April 2001, and has since been updated several times to encompass changes recommended by Tribal grantees.

In addition, the Child Care Bureau provides extensive technical assistance (TA) to Tribal grantees for questions or problems related to their reporting requirements. The Child Care Automation Resource Center, a contractor to the CCB, conducts training sessions, facilitates workshops, and delivers individualized TA to all Tribal grantees across the country. That ongoing TA has allowed the CCB to maintain ongoing communication with grantees, receiving feedback and suggestions from them as well as providing information to them. Their input is evaluated whenever changes to program requirements are considered.

9. Payment to Respondents

No payments or gifts are provided to respondents.

10. Confidentiality

There is nothing of a confidential nature in the document; therefore, respondents will not be provided an assurance of confidentiality.

11. Sensitive Nature

There are no questions of a sensitive nature.

12. Information Collection Burden

| INSTRUMENT | NUMBER OF RESPONDENTS | NUMBER OF RESPONSES PER RESPONDENT | AVERAGE BURDEN HOURS PER RESPONSE | TOTAL BURDEN HOURS |
|------------------------------------------|------------------------------|-------------------------------------------|------------------------------------------|---------------------------|
| ACF-700 form (CCDF Annual Tribal Report) | 260 | 1 | 38 | 9,880 |

Estimated Total Annual Burden Hours: 9,880

The burden is estimated based on experience with prior activities. We expect the current OMB inventory will increase by 675 hours to account for the additional reporting burden.

13. Annual Respondent Costs

There are no direct monetary costs to Tribal Lead Agencies other than the time to complete the report.

14. Annual Federal Costs

The annual cost to the Federal Government is estimated at \$42,771. This is based on the annual submission of the ACF-700 form, requiring approximately 576 professional staff hours at an average of \$61 per hour (\$35,135); 180 clerical hours at an average of \$37 per hour (\$6,660) and reproduction and mailing fees of approximately \$975.

15. Program Changes/Adjustments

This is a request to extend the prior approval of the OMB clearance of the ACF-700 Report with minor revisions. To ensure that Tribal data reporting fully complies with federally mandated reporting requirements, the CCDF Tribal Annual Report is being revised to include one new data element, i.e., Item 8 - Payment Type. This element is required by Federal regulations at 45 CFR 98.71(c)(4). In addition, the revised report includes situations during which the reason for receiving subsidized care is related to a federally declared emergency, i.e., Item 4 - Reasons for Care. Consequently, the burden hours per response has been changed from 35 to 38 hours. This will result in an increase of 675 total annual burden hours (9,880 - 9,205) and an increase of \$10,800 in the total annual respondent cost (\$158,080 - \$147,280). Please refer to Item 12 for additional detail (above).

16. Publication

The results of this information collection will be summarized and will be included in the annual CCDF Report to Congress, as appropriate. It may also be made available on the Child Care Bureau's website at: <http://www.acf.hhs.gov/programs/ccb/>.

17. Display of OMB Approval/Expiration Date

The expiration date for the OMB approval will be displayed on the information collection.

18. Exceptions to Certification Statement

There are no exceptions to the certification statement on item 19, Form OMB 83-I.

B. Collections of Information Employing Statistical Methods.

The information collection report does not use statistical methods.