

Child Care and Development Fund Tribal Plan

Supporting Statement

1. Circumstances Making the Collection of Information Necessary

The authority to require the submittal of a Block Grant plan by the lead agency in the Indian Tribe administering a Child Care and Development Fund program is contained in the Child Care and Development Block Grant Act of 1990, as amended.

The Child Care and Development Fund (CCDF) Block Grant Plan Preprint serves as the agreement between the tribal grantee (Indian Tribe or tribal organization) and the Federal government as to how the Block Grant programs will be operated. The Tribal Plans provide assurances that the CCDF funds will be administered in conformance with legislative requirements, federal regulations at 45 CFR parts 98 and 99 and other applicable instructions or guidelines issued by the Administration for Children and Families (ACF). The Tribal Plan Preprint (ACF Form 118A) is currently approved through 6/30/05 (OMB Approval Number 0970-0198). An extension of the current information collection is being requested, with no changes.

2. Purpose and Use of the of Information Collection

The primary purpose of the information contained in the Block Grant plans is to determine whether the Lead Agency can be approved to receive Block Grant funding, as required in section 658E(d) of the Child Care and Development Block Grant Act (42 U.S.C. 9858c and 9858m), as amended. The Child Care Bureau Regional Managers review the plan information to determine if the Lead Agency is operating in accordance with its approved plan when compliance issues arise. In addition, the information contained in the tribal plans helps the Child Care Bureau (CCB) identify trends, best practices and areas that need improvement. Based on a review of the plans, the Child Care Bureau designs technical assistance strategies that will be responsive to needs of Tribal Lead Agencies.

The Administration for Children and Families (ACF) has found the Tribal Plan Preprint useful in guiding Lead Agencies in the development and submission of their Block Grant Plans. The standardized, preprinted format provides complete program information necessary to complete the Block Grant plan, and expedites timely reviews by ACF staff. Because the Tribal Plan Preprint reflects the CCDBG statute and amended regulations, it serves as a framework, or blueprint for Lead Agencies in developing and implementing their CCDF programs.

3. Use of Improved Information Technology and Burden Reduction

Tribal Lead Agencies may submit a hard copy of the plan preprint, but are encouraged to submit the plan using compatible electronic media, including diskettes, or email. The Tribal Plan Preprint, assurances, certifications, and "Guidance for Completing the Plan" may be downloaded in an electronic format from the Child Care Bureau's (CCB) website at:

<http://www.acf.dhhs.gov/programs/ccb>. These materials are also available on the Tribal Child Care Technical Assistance Center's website (through a contract with the Child Care Bureau at:

<http://nccic.org/tribal>. Diskettes containing the Tribal Plan Preprint materials are also available from the Child Care Bureau and ACF Regional Offices in word.doc format. ACF Regional Office staff sends the Tribal Plan Preprint and Attachments as an email to the Tribes in their respective ACF Regions to ensure that these materials are received by Tribes in a timely manner.

4. Efforts to Identify Duplication and Use of Similar Information

There is no similar information already available.

5. Impact on Small Businesses or Other Small Entities

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

6. Consequences of Collecting the Information Less Frequently

In accordance with 45 CFR 98.17 (also see 42 U.S.C. 9858c and 9858m), Tribal Lead Agencies must submit a new CCDF plan every two years.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

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

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

The Child Care Bureau's notice soliciting comments on this information collection was published in the Federal Register on February 8, 2008 at Volume 73, Number 27, page 7563. No comments were received in response to this notice. CCB Regional Program Managers work closely throughout the year on tribal plan preprint implementation issues. Through this process tribal grantees are afforded continuous opportunities for input into the design of the tribal plan preprint. Furthermore, the Tribal Child Care Technical Assistance Center (TriTAC, a contractor to the CCB) conducts training sessions, facilitates workshops and delivers individualized on-site technical assistance to Tribal CCDF Administrators across the country. Through this ongoing technical assistance, CCB continues 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. Explanation of Any Payment or Gift to Respondents

No payments or gifts are provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

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

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

The annual public reporting burden for this information collection is estimated to average 19 hours per response. This includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing the reviewing the collection of information, and making amendments to approved plans (17.5 hours for plan + 1.5 hours for an estimated one plan amendment).

This burden hour estimate is based on past experience working with grantees to complete the Tribal Plan Preprint. This is a reduced cumulative burden estimate from the current OMB inventory for this information collection because the current inventory is based on 265 grantees. This information collection request contains the same burden hours, but is based on 259 (not 265) grantees.

The annual cost per grantee is estimated at \$380 (35 hours for plan preprint + 1 plan amendment x 3 hours per plan amendment x an average of \$20 per hour = 760 divided by 2 = \$380). This would result in an estimated annual cost for all tribal grantees of \$98,420 (\$380 x 259 grantees). NOTE: Plans are submitted biannually. This collection burden has been calculated to reflect an annual response burden.

Instrument	Number of Respondents	Number of Responses Per Respondent	Hours Per Response	Response Burden
CCDF Plan Preprint	259	1	19	4,921

NOTE: Plans are submitted biannually. This collection burden has been calculated to reflect an annual response burden.

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

There no direct monetary costs to Tribal Lead Agencies other than the time to complete the Tribal Plan Preprint.

14. Annualized Federal Costs to the Federal Government

The annual cost to the Federal Government is estimated at \$127,243.46 (\$254,486.92 divided by 2). This is based on biennial submission of the Tribal Plan Preprint and two plan amendments, requiring approximately 5,827.50 federal staff hours at an average of \$43.67 per hour.

The annual federal staff hours have decreased over the current inventory (11,130) due to several factors including: an ACF Reorganization that has resulted in dedicated Child Care Bureau staff in each of the ten ACF Regional Offices; extensive staff training and streamlined approval procedures.

Instrument	Number of Respondents	Average Burden Federal Hours per Review	Average Estimated Cost Per Hour	Total Burden Hours Per Response
CCDF Plan Preprint	259	11.25	\$43.67	2,913.75
Estimated Total Annualized Cost to the Federal Government			\$43.67 x 2,913.75 hours	\$127,243.46

15. Explanation of Program Changes or Adjustments

This is a request to extend the prior approval of the OMB clearance of the ACF-118-A form with no programmatic revisions. An adjustment has been made to the cumulative burden estimate (explained under #12) from the current OMB inventory because the Child Care Bureau’s tribal grantees have dropped from 265 (current OMB inventory) to 259 (current number of tribal grantees)

16. Plans for Tabulation and Publication and Project Time Schedule

ACF/CCB does not anticipate publishing information under the Tribal Plan Preprint. However, the CCB’s Tribal Child Care Technical Assistance Center (operated under a contract to the Child Care Bureau) gleans some general plan information for use in the “Effective Program Strategies” section of its website (<http://nccic.org/tribal/>) and the CCB may use some general information for other technical assistance materials.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

The expiration date for the OMB approval of the Tribal Plan Preprint (ACF Form 118-A) will be displayed on the first page of this information collection.

18. Exceptions to Certification for Paperwork Reduction Act Submission

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

