

THE SUPPORTING STATEMENT

Specific Instructions

A. Justification

1. Circumstances Making the Collection of Information Necessary

Pursuant to section 658K of the Child Care and Development Block Grant Act of 1990 as amended by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 [PRWORA] (P.L.104-193), the Department of Health and Human Services (HHS) established uniform reporting requirements, for which States and Territories must submit annual aggregate reports. These reports are derived from administrative data collected by States and Territories in the course of providing services to families and children under the Child Care and Development Fund (CCDF). This data includes unduplicated annual counts of children and families, payment method by child care setting type, number of child care providers by child care setting type, consumer education methods, and pooling information. The ACF-800 and its instructions specify the minimal set of data necessary for compliance with the Act. Consistent with the statute and regulations, ACF requests extension of the ACF-800.

2. Purpose and Use of the Information Collection

The aggregate administrative information received through this collection provides the means to analyze and evaluate the CCDF program and the extent to which States and Territories are assisting families in addressing child care needs. This collection will provide ACF with the information necessary to make reports to Congress, address national child care needs, offer technical assistance to grantees, meet performance measures, and conduct research.

3. Use of Improved Information Technology and Burden Reduction

The States and Territories may use any available information technology to reduce the burden of information and data collection requirements prescribed in the Statute. ACF accepts ACF-800 reports via a secure internet web site. System edit checks provide immediate feedback concerning the accuracy of the submitted data. ACF provides technical assistance to Grantees in the use of the electronic system toward improved data accuracy and reliability.

4. Efforts to Identify Duplication and Use of Similar Information

This data collection is required by section 658K of the statute and does not duplicate any other reporting or record-keeping requirements.

5. Impact on Small Businesses or Other Small Entities

This data collection effort does not involve small business or other small entities.

6. Consequences of Collecting the Information Less Frequently

Section 658K of the statute requires States and Territories to transmit information collected on an annual basis. The data is submitted annually on the last day of the calendar year and covers the most recent Federal fiscal year (October through September). The first report was due December 31, 1997.

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

The collection of this information is conducted in accordance with 5 CFR 1320.6.

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

A notice in the Federal Register (Volume 74, Number 53, pages 11960-11961) was posted on March 20, 2009. In this notice, ACF solicited public comment on the extension of this data collection while proposing several changes and clarifications to the reporting requirements and instructions. The proposed changes and clarifications are summarized below:

A) ACF proposed to add pre-kindergarten information requesting the estimated number of CCDF-eligible children receiving pre-K child care services (previously required on the ACF-801 report). Lead Agencies may find it easier to provide an annual aggregate estimate on the ACF-800 rather than a monthly estimate on the ACF-801.

B) ACF proposed to refine the consumer education data elements by distinguishing "content" (e.g., information on quality of care) from "methods" (e.g., written materials). We believe that this distinction will help grantees more easily differentiate between types of information being asked for and facilitate more accurate reporting.

C) ACF proposed to collapse and streamline answer categories for non-CCDF funds (Item 19 on the existing form and Item 14 on the proposed form) from ten to six choices.

D) ACF proposed to clarify the ACF-800 instructions for Items 12 and 13 related to the pooling factor. The proposed instructions clarify that, while ACF allows States to report data on all children and families served by pooled funds in order to ease administrative burden, all children and families served by pooled funds must meet CCDF eligibility requirements. States that use non-CCDF funding sources to serve populations of children and families who are not eligible for CCDF services should not report administrative data on those children and families on the ACF-800 or ACF-801 reports.

As a consequence, although the data elements on the proposed form remain in nearly the same order as the existing form, the numbering has changed. We realize that these proposed changes may require States and Territories to modify their data reporting systems and processes. Therefore, we are proposing a delayed effective date in order to give Lead Agencies additional time to implement the changes. These changes will become effective October 1, 2010.

Comment was to be received within 60 days of the publication date of the

notice. Only one state commented and was supportive of all proposed changes.

In light of the limited number of comments received and the nature of the comments, the Child Care Bureau expects that the costs of implementing the proposed changes will be manageable for most States. Additionally, the Child Care Bureau anticipates that the proposed changes and clarifications will benefit both the States and the Federal government by improving data collection quality and utility.

In addition, ACF continues to obtain input on this collection on an ongoing basis from States and Territories through regular regional and national meetings with Grantees. During the original development, ACF obtained input from States and Territories through quarterly data meetings, its State Issues Work Group (composed of a State representative from each of the ten ACF Regions), and at regular regional and national meetings with Grantees. Notice regarding the ACF-800 was also posted on the "Ccadmin" electronic mailing list for child care administrators.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

This information collection does not require any assurance of confidentiality.

11. Justification for Sensitive Questions

This data collection does not involve asking questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

All States and Territories are required to participate and report on the CCDF program on a quarterly basis, a mandatory requirement effective April 1998. The burden of collecting the information is estimated as follows:

ANNUAL BURDEN ESTIMATES

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
ACF-800	56	1	40	2,240

We estimate that the time required to assemble and transmit the data file will take approximately 40 hours per transmission at an estimated \$25 per hour and \$1,000 per State and Territory, i.e., \$56,000 per year.

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

Operational cost for systems software computer time will average about \$4,000 a year per State and Territory, i.e., \$224,000 per year. The total annual cost including burden hours, i.e., \$56,000 per year, plus systems-related expenses, i.e., \$224,000, will total \$280,000.

14. Annualized Cost to the Federal Government

ACF accepts ACF-800 reports via a secure internet web site. System edit checks provide immediate feedback concerning the accuracy of the submitted data. The electronic system performs audit checks and provides feedback to the States and Territories. In addition, program analysts review the information to ensure consistency and contact grantees as necessary when information is incomplete or questionable. Maintenance and modest enhancements to the ACF-800 web site and provision of technical assistance/training to States and Territories for completing and submitting the ACF-800 report are estimated to cost approximately \$100,000 per year. Data analysis and publication costs are estimated to cost approximately \$50,000. Total estimated cost is approximately \$150,000.

15. Explanation for Program Changes or Adjustments

As described under Item 8 (above), there are some very modest proposed program changes. They include: (1) adding pre-kindergarten information requesting the estimated number of CCDF-eligible children receiving pre-K child care services (previously collected as part of the ACF-801); (2) refining the consumer education data elements by distinguishing "content" from "methods" to help grantees more easily differentiate between types of information being asked for and facilitate more accurate reporting; (3) collapsing and streamlining answer categories for non-CCDF funds to help grantees more easily differentiate between funding sources being asked for and facilitate more accurate reporting; and (4) clarify the instructions related to the pooling factor to ensure that States accurately report pooled funds based on CCDF eligibility requirements. As a consequence of these changes, the data elements on the proposed form remain in nearly the same order as the existing form but the numbering has changed. Finally, these changes have no affect on the burden estimate.

16. Plans for Tabulation and Publication and Project Time Schedule

Fiscal Year 1998 through 2007 data from the ACF-800 has been processed and reported in a variety of places. Specifically, data has been incorporated into the Child Care Bureau (CCB) Report to Congress, used by ACF to respond to requests from Congress, track ACF's performance under the Government Performance and Results Act, and respond to inquiries regarding the progress and effectiveness of the CCDF program as well as posted on the CCB website.

Data is typically published six to nine months after data submission deadline first on the Child Care Bureau website and subsequently in the biennial Child Care Bureau Report to Congress.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.

B. Statistical Methods (used for collection of information employing statistical methods)

1. Respondent Universe and Sampling Methods

The information reported by States and Territories via the ACF-800 is derived primarily from administrative data that is collected in the course of providing CCDF services to families and children. These administrative data systems include information about the full population of families and children being served. Since full population information is being collected and reported by States and Territories in the course of doing business, the issue of sampling is not relevant.

2. Procedures for the Collection of Information

The States and Territories supply ACF-800 data once a year. They submit the data via a secure internet web site. The data is stored in a database from which State-level and national level reports can be generated to support reporting requirements such as reports to Congress.

3. Methods to Maximize Response Rates and Deal with Nonresponse

100% response rate.

4. Test of Procedures or Methods to be Undertaken

There are no rigorous statistical procedures or methods employed. The ACF-800 data that CCB reports is the same data that the States and Territories submit. The only exception revolves around aggregating the data to produce national totals.

5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data

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