

## CHILD CARE AND DEVELOPMENT FUND PLAN

### **Supporting Statement**

#### **1. Circumstances Making the Collection of Information Necessary**

The authorization to require the submittal of a Block Grant Plan by the Lead Agency in the State or Territory administering a Child Care and Development Fund (CCDF) program is contained in the Child Care and Development Block Grant Act of 1990 (CCDBG Act), Public Law 101-508 as amended by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Public Law 104-193. To be eligible to receive funds under this program, Section 658E of the CCDBG Act, 42 U.S.C. 9858c, a State or Territory shall prepare and submit to the Secretary an application at such time, in such manner, and containing such information as the Secretary shall require by rule, including a CCDF Plan that meets the requirements of Section 658E(c) of the CCDBG Act, 42 U.S.C. 9858c(c).

The Child Care and Development Fund (CCDF) Plan Preprint serves as the agreement between Lead Agency and the Federal Government as to how the Block Grant program will be operated. The Lead Agency provides 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 Lead Agency CCDF Plan Preprint (ACF Form 118) is currently approved through 12/31/2013 (OMB Approval Number 0970-0114). A revision of the current information collection is being requested.

#### **2. Purpose and Use of the Information Collection**

The primary purpose of the information contained in the CCDF Plan 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 Office of Child Care reviews 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 State and Territory Plans helps the Office of Child Care identify trends, best practices, areas that need improvement and to determine if the State and Territory are administering the program in accordance with the CCDBG Act and amended regulations. Based on a review of the plans, the Office of Child Care designs technical assistance strategies that will be responsive to the needs of the Lead Agencies.

The Administration for Children and Families (ACF) has found the CCDF Plan Preprint useful in guiding Lead Agencies in the development and submission of their Plans. The standardized, "Preprinted" format provides complete program information necessary to complete the CCDF Plan, ease the burden on States and Territories, especially with the

inclusion of check boxes, and expedites timely reviews by ACF staff. Because the CCDF 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.

The public takes considerable interest in the way States and Territories administer their CCDF funds. With the focus on transparency, the Plan Preprint allows Lead Agencies to provide the public an opportunity to comment on the provision of child care services under the Plan. The Office of Child Care also makes Plan information available to many users including members of Congress, Congressional Committees, State, and local child care administrators, advocacy groups, researchers and the public.

### **3. Use of Improved Information Technology and Burden Reduction**

Lead Agencies have the opportunity to submit their Plans electronically as OCC has designed an on-line submission tool for Lead Agencies to enter their Plan information on the Web. OCC will continue to work with Lead Agencies on the usability of this on-line submission. Some of the revisions to the Pre-print (e.g. extensive use of checkboxes) were designed and formatted to make the Plan suitable for an electronic submission process.

### **4. Efforts to Identify Duplication and Use of Similar Information**

The information collected by the ACF-118 is not available from any other source.

### **5. Impact on Small Businesses or Other Small Entities**

The data collection effort does not involve small businesses or other small entities.

### **6. Consequences of Collecting the Information Less Frequently**

In accordance with 45 CFR 98.13, Lead Agencies are required to provide a Plan that describes the entire child care program in detail biennially.

### **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 Office of Child Care's (OCC) notice soliciting comments on this information collection was published in the Federal Register on September 4, 2012 at 77 FR 53891. OCC sent an email message to State and Territory Lead Agencies and a

separate message to a large email list of external stakeholders notifying them of the September 4, 2012 Federal Register notice including sending electronic copies of the draft State Plan Preprint. Finally, the FRN and the proposed Pre-Print were posted on the OCC website to make it available widely.

OCC received insightful comments on the CCDF Plan Preprint for States/Territories from 11 entities/organizations. The major themes for the comments were:

- Requests for clarification, definitions and guidance to improve Lead Agency's understanding of what is being requested and what is required.
- Requests to revise some questions to lessen the administrative burden hours on Lead Agencies
- Requests revisions of several questions to avoid unintended consequences that could result in additional costs to parents or providers or impact the continuity of care for children.
- Request for clarification on data that Lead Agencies are expected to collect for the Quality Performance Report (QPR)

After publication of the first announcement, the OCC held a series of meetings with States and National Organizations to discuss and clarify comments and made changes/revisions to the following sections:

- o 2.3.6 CCDF Eligibility Re-determination – Added questions to clarify the redetermination periods, coordination and alignment with other programs such as SNAP, Medicaid and SCHIP, and the circumstances under which family's eligibility is reviewed prior to re-determination.
- o 2.7.4 Payment Rates – Revised section to request information on lowest and maximum rates in relation to the current Market Rate Survey.
- o 2.7.7 Additional fees that providers charge parents – Revised question to directly ask if Lead Agencies have payment policies regarding additional provider fees.
- o 2.7.8 Payment Policies and Customary Business Practice – Revisions in this section include reformatting the question for Lead Agencies to adequately describe specific policies and practices implemented for consistency with the general child care market in order to be fair to providers.
- o 3.1 – 3.4 Licensing, Health and Safety and Quality Improvement Activities (Part 3). Revisions to the Health and Safety sections of the Plan Preprint document include the following:
  - Clarified terminology to allow States/Territories to report in accordance with the categories of care as defined in CCDF

regulations, while recognizing that the categories of care in State/Territory regulations may be defined differently

- Added a limited number of questions to provide more context about how the States and Territories implement their licensing and health and safety compliance activities.
  - Added a question to obtain more specific information on the types of providers subject to licensing.
  - Updated table categories in 3.1.1c and revised/reduced the number of categories in 3.1.1e to improve Lead Agencies' understanding of what is being requested and what is required to simplify reporting.
  - Added a ruler icon in Section 3.2 through 3.4 in order to identify the specific questions used in the performance measures.
- o Appendix 1 – Quality Performance Report (QPR) – Revisions to this Appendix include refining questions and data elements and adding a new section A5 to capture progress on Subsidy goals.

The attached draft incorporates the revisions based on the comments and OCC's discussions.

Lead Agencies are afforded continuous opportunities for input into the design of the State and Territory Plan Preprint. The OCC conducts training sessions, facilitates workshops and delivers individualized technical assistance to CCDF administrators across the country. Through this technical assistance, OCC maintains 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**

The information collection is nothing of a confidential nature, therefore does not require any 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 162.57 hours per response. This includes the time for designing the CCDF Plan Preprint and the guidance provided to the States and Territories in completing their State Plans. This also includes the time for the review and approval process by the ACF Central and Regional offices. Total cost is projected to be approximately \$5,687. 50.

Instrument	Number of Respondents	Number of Responses Per Respondent	Hours Per Response	Response Burden
CCDF Plan Preprint	56	.5	162.50	4,550

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

There are no direct monetary costs to Lead Agencies other than the time to complete the ACF-118.

### 14. Annualized Costs to the Federal Government

The annual costs to the Federal Government are projected as follows:

Task	Estimated Hours	Estimated Rate	Total
Preprint Design	160	\$30.58	\$ 4,892.80
State and Territory Plan Review	40 * 56 Plans = 2,240	\$30.58	\$68,499.20
		Total	\$73,392

NOTE: Plans are submitted biennially.

### 15. Explanations of Program Changes or Adjustments

There were no changes or adjustments made to the annual cost burden to respondents or the annualized costs to the Federal Government. Minor changes were made to some questions in the document to provide additional clarification to Lead Agencies. Please refer to question #8.

### 16. Plans for Tabulation and Publication and Project Time Schedule

Not applicable.

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

Not applicable.

**18. Exceptions to Certification for Paperwork Reduction Act Submission**

There are no exceptions.

**B. Collection of Information Employing Statistical Methods**

Not applicable. The information collected by the ACF-118 is not the type of information that may be collected by statistical methods. Statute requires States and Territories to prepare and submit to the Secretary a CCDF Plan that meets the requirements of Section 658E(c) of the CCDBG Act, 42 U.S.C. 9858c(c).