

CHILD CARE SUBSIDY APPLICATION FORMS
OMB 2900-0717
(VA FORMS 0730a and 0730b)

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

Public Law 107-67, Section 630, and Title 5, Part 792, Subpart B of the Code of Federal Regulations, authorizes executive agencies to use appropriated funds to assist lower income employees with the cost of child care. Children from birth until the age of 13 and children under the age of 18, if disabled, are eligible. For this program, a child is defined a child who bears any of the following relationships to the employee, the employee's spouse, or the employee's domestic partner:

- A biological, adopted, step, or foster child who lives with the Federal employee;
- A child for whom a judicial determination of support has been obtained;
- A child to whose support the VA employee, the employee's spouse, or the employee's domestic partner makes regular and substantial contributions..

The Department of Veterans Affairs (VA) implemented the VA Child Care Subsidy Program in January 2001. Employees must submit an on-line application (**VA Form 0730a**) through Child Care Records Management System (CCRMS) to participate in the Child Care Subsidy Program. The application contains personally identifiable information pertaining to the employee, the employee's spouse, and the employee's child(ren). This information is used to validate the employee's Social Security Number, the employee's (and spouse's, if applicable) total family income, whether the employee's spouse is a Federal employee, and each child's date of birth.

In addition, child care providers must submit information on **VA Form 0730b** regarding the type of child care services that they provide as well as their address, phone number, e-mail address, tax identification number or Social Security Number, license number and license expiration date for validation purposes.

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

- a. **VA Form 0730a** is completed on-line through CCRMS and submitted by employees as an official application to participate in the VA Child Care Subsidy Program and contains information used to evaluate an employee's eligibility to participate. Hard copy forms are only used in the event of CCRMS is not operational.
- b. **VA Form 0730b** is completed by child care providers and included in an employee's application package, whenever the information contained on the VA Form 0730b on file changes, or when the employee changes child care providers. This form is used to validate that the child care provider is licensed and/or regulated by the state as required by Title 5, Part 792, Subpart B of the Code of Federal Regulations

c. If the collection of information were not carried out, the approving official would not be able to validate whether the employee and child(ren) is eligible to participate in VA Child Care Subsidy Program. The approving official would also not be able to determine whether the child care provider is licensed and/or regulated by the state to perform child care.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology (e.g. permitting electronic submission or responses, and the basis for the decision for adopting this means of collection). Also describe any consideration of using information technology to reduce burden.

VA Forms 0730a and 0730b will be made available in a fillable format on the VA Forms Web site. The 0730a form used for the application process is completed on-line as a part of the electronic application process. The 0730b is still required completion by third parties – VA child care providers or facilities as program vendors. The forms may be downloaded and made available for manual completion by applicants who do not have access to the VA Forms Website.

4. Describe effort to identify duplication. Show specifically why any information already available cannot be used or modified for use for the purposes describe in Item 2 above.

The forms have a specific purpose and limited use. There is no data available that can be used or modified for this purpose. Each individual entry is a single entity and is required for the collection of information to process an employee's application to participate in the VA Child Care Subsidy Program and to validate that the child care provider is licensed and/or regulated by the state.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB form 83-1) describe any methods used to minimize burden.

The information collected on VA Forms 0730a and 0730b will be used by the Child Care Subsidy Program Service an in-house VA program that administers the day-to-day operations of the VA Child Care Subsidy Program. This function includes receiving and evaluating the information contained on the forms to determine whether an employee meets the eligibility criteria to participate in the program and whether the child care provider is licensed. The forms have been designed to minimize the information collection burden on the public and applicant.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

If the collection of information were not carried out the Child Care Subsidy Program Service, the program would not be able to determine whether an employee and child(ren) are eligible to participate in the VA Child Care Subsidy Program and whether the child care provider is eligible for use by the employee under the program.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly, or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OPM.

There are no such special circumstances.

8. a. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice required by 5 CFR 1320.8(d), soliciting comments on the information prior to submission to OMB. Summarize public comments received in response to the notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on the cost and hour burden.

The Department notice was published in the Federal Register, Volume 79, No. 218 on Wednesday, November 12, 2014, page 67241. There were no comments received in response to this notice.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and record keeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances that preclude consultation every three years with representatives of those from whom information is to be obtained.

No outside consultations were made as only essential information is solicited. Responses to the questions on the forms are considered as standard business practice.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Employees who are approved to participate in the VA Child Care Subsidy Program will be subsidized with a percentage of their monthly child care costs. Information provided on the form will be used to determine the percentage of monthly costs to be subsidized. No other payments or gifts are provided.

10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulations, or agency policy.

Respondents are informed that the furnishing of data is voluntary; that Public Law 104-134 authorizes use of their social security number for the orderly administration of records; and that disclosure of the information may be made in accordance with the disclosure provisions of the Privacy Act of 1974. (System of Records 165VA05CCSP, Child Care Subsidy Program Records).

11. Provide additional justification for any questions of a sensitive nature such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no sensitive questions involved in this data collection.

12. Estimate of the hour burden of the collection of information:

a. We estimate the following respondent burden:

VA Form 0730a: 2,000 Responses x 15 minutes/60 = 500 hours

VA Form 0730b: 2,000 Responses x 10 minutes/60 = 333 hours

4,000 total responses

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in Item 13 of OMB 83-1.

The aggregate burden is 833 hours.

c. Provide estimates of annual cost to respondents for the hour burden for collections of information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

The cost to respondents for completing this form is \$19,992 (833 hours x \$24/hr).
No additional record recordkeeping is required.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Item 12 and 14).

a. There is no capital start-up operation or maintenance costs.

b. Cost estimates are not expected to vary. The only cost is the time of the respondent.

c. There are neither anticipated capital start-up cost components nor requests to provide information.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

Agencies also may aggregate cost aggregate cost estimates from Items 12, 13, and 14 in a single table.

The annual cost to the Federal Government is \$79,880.00

- a. The estimated annual cost to the Federal Government for VA Form 0730a is \$34,435.

Printing and distribution	No Charge
2,000 Claims x \$11.98/hr (GS 3/5) divided by 4 (15 min) =	\$ 5,990
2,000 Claims x \$15.05/hr (GS 5/5) divided by 4 (15 min) =	\$ 7,525
2,000 Claims x \$18.64/hr (GS 7/5) divided by 4 (15 min) =	\$ 9,320
2,000 Claims x \$22.80/hr (GS 9/5) divided by 4 (15 min) =	<u>\$ 11,400</u>
	\$ 34,235

- b. The estimated annual cost to the Federal Government for VA Form 0730b is \$45,645.

Printing and distribution	No Charge
2,000 Claims x \$11.98/hr (GS 3/5) divided by 3 (20 min) =	\$ 7,986
2,000 Claims x \$15.05/hr (GS 5/5) divided by 3 (20 min) =	\$ 10,033
2,000 Claims x \$18.64/hr (GS 7/5) divided by 3 (20 min) =	\$ 12,426
2,000 Claims x \$22.80/hr (GS 9/5) divided by 3 (20 min) =	<u>\$ 15,200</u>
	\$ 45,645

15. Explain the reason for any program changes or adjustment reported in Items 13 or 14 of OMB 83-1.

VA's previous OMB submission showed salary figures for 2011 under the GS/ DC locality pay scale. Supporting statement number 14 now reflects the 2014 salary figures under the GS pay scale with no locality because VA customers are nation-wide. The correct pay scale is being reported.

The processing time of each VA Form 0730a has decreased from 20 minutes to 15 minutes. This is due to VA's development of the automated Child Care Records Management System to process on-line applications (VA Form 0730a).

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There are no plans to publish the information collected on any of the forms.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

For cost effectiveness, we request a waiver to omit an expiration date.

**18. Explain each exception to the certification statement identified in Item 19
“Certification for Paperwork Reduction Act Submission,” of OMB 83-1.**

There are no exceptions.

B. Collection of Information Employing Statistical Methods

No statistical methods are used in this data collection.