

**SUPPORTING STATEMENT FOR OMB CLEARANCE
FOR THE ACF-801**

**Department of Health and Human Services
Administration for Children and Families
Office of Child Care**

**CHILD CARE AND DEVELOPMENT FUND (CCDF)
QUARTERLY CASE RECORD REPORT
ACF-801**

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary:

Section 658K of the Child Care and Development Block Grant (CCDBG) Act (42 U.S.C. 9858, as amended by Public Law 113-186) requires that States and Territories submit monthly case-level data on the children and families receiving direct services under the Child Care and Development Fund (CCDF). The implementing regulations for the statutorily required reporting are at 45 CFR 98.70 and 98.71. Case-level reports, submitted quarterly or monthly (at grantee option), include monthly sample or full population case-level data. The data elements to be included in these reports are represented in the ACF-801. ACF uses disaggregate data to determine program and participant characteristics as well as costs and levels of child care services provided. This provides 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.

2. Purpose and Use of the Information Collection:

The case-level 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:

ACF has made arrangements with the National Institutes of Health for secure electronic file transfer using either CyberFusion or by using secure FTP (File Transfer Protocol). These methods of transmission ensure that case identifiers remain secure in the transmission. States that cannot transmit the ACF-801 data via one of the above methods may submit using an encrypted and/or password protected diskette/CD via registered mail. ACF provides technical assistance to Grantees in the use of secure electronic file transfers 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.

Similar Information:

No similar information is being collected on CCDF program participants and related child care services that can be used to respond to the issues identified in section 658K. Collection of the information specified on the ACF-801 is necessary to comply with the Federal statute and regulations, and to ensure the availability of data to respond to inquiries regarding the progress of the CCDF program and related issues.

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 a quarterly basis (or monthly at State/Territory option). The data are submitted no later than 60 days after the end of each quarter and includes a minimum of 200 records for each of the three months of the quarter (October through December, January through March, April through May, and July through September, as appropriate). States and Territories have the option of submitting full population or sample data.

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 80, Number 88, pages 26266-26267) was posted on May 7, 2015. In this notice, ACF solicited public comment on the extension of this data collection with changes.

Consistent with the recent reauthorization of the CCDBG statute, ACF requests extension of the ACF-801 including a number of changes and clarifications to the reporting requirements and instructions as set forth below.

- 1) *Homeless Status:* Section 658K(a)(1)(B)(xi) of the CCDBG Act now requires States to report whether children receiving assistance under this subchapter are homeless children.
- 2) *Child Disability:* ACF proposes to add a new data element indicating whether or not each child receiving services is a child with a disability, in part to track State implementation of priority for services requirements at section 658E(c)(3)(B) of the CCDBG Act (which includes children with special needs as defined by the State).
- 3) *Military Status:* ACF proposes to add a new data element to the ACF-801 to determine the family's status related to military service.

- 4) *Family Zip Code and Provider Zip Code*: ACF proposes to add zip codes to both the family and the provider records to identify the communities where CCDF families and providers are located, in part to support implementation of sections 658E(a)(2)(M) and 658E(a)(2)(Q) of the CCDBG Act that require States to address the supply and access to high-quality child care services for certain areas and populations.
- 5) *Quality of Child Care Providers*: The existing ACF-801 allows States several ways of reporting information on the quality of each child's provider(s)—including: Quality Rating and Improvement System (QRIS) participation and rating, accreditation status, State pre-K standards, and other State-defined quality measure. To date, States have been required to report on at least one of the quality elements for a portion of the provider population. ACF is proposing that, effective with the October 2017 report, States must report quality information for every child care provider. States with a QRIS, at a minimum, would be required to report QRIS participation and rating for every provider. States without QRIS would be required to report quality information for every provider using one or more of the quality elements on the form. ACF is proposing to add a new option to indicate whether or not the provider is subject to Head Start or Early Head Start standards.
- 6) *Inspection Date*: Section 658E(c)(2)(J) of the reauthorized CCDBG Act requires States to monitor both licensed and license-exempt CCDF providers. ACF proposes to add a data element effective October 2017 indicating, for each child care provider delivering services to a CCDF child, the date of the most recent inspection for compliance with health, safety, and fire standards (including licensing standards for licensed providers).
- 7) *Personally Identifiable Information*: Section 658K(a)(1)(E) of the CCDBG Act now prohibits the ACF-801 report from containing personally identifiable information. As a result, ACF proposes to delete Social Security Numbers (SSNs) from the report. Note that the form will still require a unique identifying number, other than the SSN, that is assigned by the State for each family.
- 8) *Language*: ACF proposes to add a data element effective October 2017 indicating, the primary language spoken in the home consistent with a Head Start PIR question, i.e., Primary Language of Family at Home.

Comments were received from California, Maine, Minnesota, Virginia, Washington, the American Public Human Services Administration/National Association of State Child Care Administrators (APHSA/NASCCA), and the Center for Law and Social Policy (CLASP).

Regarding Homeless Status, CA, ME, and MN indicated that they do not currently collect data on homelessness and cannot meet this new requirement in the proposed timeframe. Parenthetically, ME indicated that their Automated Client Eligibility System collects **annual** information related to Homelessness as defined under Food Stamps.

Consistent with the reauthorization of the CCDBG statute in November of 2014, the Homeless Status data element will be required with the reporting period beginning October 2015 (FFY 2016).

Regarding Child Disability, CA indicated that they do not currently collect data on child

disability and cannot meet this new requirement in the proposed timeframe. MN indicated that they are unable to report child disability for the full CCDF population. In addition, they indicated that they only collect information on the disability status of children who are receiving additional CCDF benefits based on a diagnosed disability, and/or are receiving benefits to an extended age.

OCC proposes to allow States and Territories additional time to report on Child Disability. Specifically, this data element will not be required before the reporting period beginning on October 1 of 2016 (FFY 2017). In the interim, beginning with October 1 of 2015 (FFY 2016), States and Territories may elect to begin reporting this data element.

Regarding Military Status, CA, ME, and MN indicated that they do not currently collect data on military status and cannot meet this new requirement in the proposed timeframe. Parenthetically, ME indicated that Maine's Office of Family Independence collects military information but it is a Demographics question and a response is "**optional**" for the individual. There is also a question that asks if the individual has "**Served in the US Armed Forces**". The individual can also provide a Veteran ID if they so choose. This information does not discern whether or not the individual is "currently" involved with the Military or if it was a past involvement.

OCC proposes to allow States and Territories additional time to report on Military Status. Specifically, this data element will not be required before the reporting period beginning on October 1 of 2016 (FFY 2017). In the interim, beginning with October 1 of 2015 (FFY 2016), States and Territories may elect to begin reporting this data element.

No comments were received regarding Family and Provider Zip Codes except from CLASP that "particularly commends the administration for proposing the collection of additional data elements". This data element will not be required before the reporting period beginning on October 1 of 2016 (FFY 2017). In the interim, beginning with October 1 of 2015 (FFY 2016), States and Territories may elect to begin reporting this data element.

Regarding Quality of Child Care Providers, OCC is proposing that, effective with the October 2017 report, States must report quality information for every child care provider, i.e., participation and rating. Currently, CA does not have a uniform QRIS rating system across counties. Nor do they anticipate being able to put one into place in the foreseeable future. However, CA (a recipient of one of the federal Race-To-Top Early Learning Challenge Grants) is working with a Regional Leadership Consortia in 16 counties and has had some success with QRIS alignment. MN suggests that States have the option to define QRIS participation as including only programs with a current active rating. Other States would be permitted to define participation differently, e.g., including programs that have agreed to seek a rating but are not yet rated. With respect to whether the providers are subject to Head Start (HS) or Early Head Start (EHS) Standards, MN does not currently collect this information on CCDF providers.

OCC understands that CA does not have a uniform QRIS rating system across counties. Given that the current goal is to measure participation and collect a rating for every participating provider, and that different States are using different rating systems, OCC is not requiring that States adopt a uniform QRIS rating system across counties. With regard to MN's suggestions, OCC recommends that States take advantage of the ability to provide footnotes as part of their ACF-801 Report in order to capture distinctions

among programs that are participating but not yet rated as well as the ability and/or inability to collect information on HS or EHS Standards.

Regarding Inspection Date, OCC is proposing that, effective with the October 2017 report, States report the most recent annual inspection date for compliance with health, safety, and fire standards (including licensing standards for licensed providers). Where the State uses more than one visit to check for compliance with these standards, the State should report the most recent date on which all inspections were completed. CA does not currently collect this information. To implement, CA would need to transfer this information from the CA Department of Social Services/Community Care Licensing to the California Department of Education at “extreme cost” and not in time to meet the proposed effective date. MN does not have the ability to report on inspection dates for providers under the jurisdiction of outside entities, e.g., States or Tribes. APHSA/NASCCA commented that portions of certain inspections may be completed on different dates and that a more streamlined approach, i.e., the addition of fields to capture various inspections and related dates might be beneficial.

OCC proposes that capturing the most recent annual inspection date (with qualifying language in the ACF-801 Instructions) is sufficient and can be accomplished by October 2017. Furthermore, OCC doesn’t believe that CCDF grantees should be funding a provider unless they know the provider has been inspected within the past year (requiring the need to track the most recent annual inspection date even if an outside entity has jurisdiction over the inspection).

Personally Identifiable Information, CA indicated that they have never developed a unique family identifier. However, CA indicated that they can use an alternative Family Identification/Case Number (FICN) for the family, child, and provider in lieu of an SSN (which is NOT unique) owing to how the CCDF program is administered in their state. Any attempt to implement a unique state identifier will require an expensive and labor intensive effort that cannot be completed within the proposed timeframe. WA indicated that assigning unique state identifiers for the parent and the child will not be possible by the October 2015 deadline. WA needs more time to align internal and interagency systems.

OCC proposes to allow States to provide “interim” Unique State Identifiers until “permanent” Unique State Identifiers can be implemented. This strategy, although not optimal, will require that States submitting interim identifiers re-submit data once permanent identifiers are in place.

Additional comments were received from CLASP. One set of comments revolves around generating more public reports from existing data including looking at variables such as “deep” poverty”, i.e., quality of child care accessed by poverty level, more granular analysis of racial/ethnic backgrounds, i.e., type and quality of child care accessed by race/ethnicity, as well as relationships between the aforementioned variables. OCC agrees that generating more reports based on poverty level, race/ethnicity, etc., is a valuable undertaking and will pursue implementing these reports as time and resources permit.

In addition, CLASP recommends that a new variable be added to the ACF-801 Report, i.e., Language. OCC agrees with the CLASP recommendation and proposes to add the new variable Language consistent with a Head Start Program Information Report

question, i.e., Primary Language of Family at Home effective October 2016. The newly reauthorized CCDBG Act includes provisions that support services to English language learners. Specifically, section 658E(c)(2)(G) requires States to assure that training and professional development of child care providers address needs of certain populations to the extent practicable, including English language learners. Under 658G, allowable quality activities include providing training and outreach on engaging parents and families in culturally and linguistically appropriate ways to expand their knowledge, skills, and capacity to become meaningful partners in supporting their children's positive development. Furthermore, Title VI of the Civil Rights Act of 1964 requires federally assisted programs to take reasonable steps to provide meaningful access for persons who have limited English proficiency. The new data element on the ACF-801 will allow CCDF Lead Agencies to track provision of CCDF services to families who primarily speak languages other than English. By collecting information on the specific language spoken at home by families, the CCDF Lead Agency will be able to design outreach and consumer education materials that meet the needs of populations in their service areas.

9. Explanation of Any Payment or Gift to Respondents:

Not applicable.

10. Assurance of Confidentiality Provided to Respondents:

Section 658K(a)(1)(E) of the CCDBG Act now prohibits the ACF-801 report from containing personally identifiable information. As a result, ACF proposes to delete Social Security Numbers (SSNs) from the report. Note that the form will still require a unique identifying number, other than the SSN, that is assigned by the State for each family. Historically, to ensure confidentiality, ACF has made arrangements with the National Institutes of Health for secure electronic file transfer using either CyberFusion or by using secure FTP (File Transfer Protocol). Going forward, these same methods of transmission will ensure that case identifiers, i.e., unique identifying numbers, remain secure in the transmission. States that cannot transmit the ACF-801 data via one of the above methods may submit using a diskette/CD via registered mail. ACF provides technical assistance to Grantees in the use of the electronic system toward improved data accuracy and reliability.

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:

Number of Respondents:	56
Number of Responses per Respondent:	4
Average Burden Hours per Response:	25
Total Burden Hours per Year:	5,600

We estimate that the time required to assemble and transmit the data file will take approximately 25 hours per transmission at an estimated \$25 per hour which totals \$2,500 per State and Territory. Operational cost for systems software computer time will average about \$4,500 a year per State and Territory. The estimated yearly cost for all States and Territories is \$392,000.

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

Changes to the ACF-801 are estimated to increase the annual cost burden from \$380,800 to \$392,000. Greater detail is given under Item 15 below.

14. Annualized Cost to the Federal Government:

The estimated annual Federal cost is \$513,600. This includes staff costs of program analysts who review the information to ensure consistency and contact grantees as necessary when information is incomplete or questionable. It also includes systems costs, including data base maintenance, associated with the electronic system that performs audit checks and provides feedback to the States and Territories.

15. Explanation for Program Changes or Adjustments:

CCDBG was reauthorized in November of 2014 requiring a new data element, i.e., Homeless Status, as well as the removal of Personally Identifiable Information. In addition to these mandated changes, ACF is proposing several additions/changes to support reauthorization listed under Item 8 (above). They include: Child Disability, Military Status, Family and Provider Zip Codes, Inspection Date, and Language, as well as a small change in how to report the existing Quality of Child Care Providers. These changes are estimated to increase the annual cost burden from \$380,800 to \$392,000.

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

Fiscal Year 1998 through 2013 data from the ACF-801 has been processed and reported in a variety of places. Specifically, data has been incorporated into the Office of Child Care (OCC) 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 OCC website on an annual basis.

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

The expiration date is currently displayed at the top right corner of the Form ACF-801.

18. Exception to Certification for Paperwork Reduction Act Submissions:

There are no exceptions to this form.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

1. Respondent Universe and Sampling Methods:

The information reported by States and Territories via the ACF-801 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 by States and Territories in the course of doing business, the issue of sampling is not relevant. However, as described in ACYF-PI-CC-98-01, issued on January 22, 1998, States and Territories have the option of submitting a sample of their records for the ACF-801 report. This issuance indicates that States choosing to submit sample data must develop a methodology that conforms to the principles of probability sampling, i.e., each family in the population of interest must have a known, non-zero probability of selection. A sample frame must be constructed for each month in the annual sample period and include approximately one-twelfth of the required minimum annual sample. States that sample are required to have their sampling plan approved by the Office of Child Care. The first sampling plan was due February 28, 1998. State and Territories that submit their entire caseload were not required to submit a sampling plan. Instead they were required to submit a statement indicating their intention to submit data for the entire population.

2. Procedures for the Collection of Information:

Not Applicable.

3. Methods to Maximize Response Rates and Deal with NonResponse:

Ongoing TA provided by OCC data contractor via email, fax, telephone, and on-site visits.

4. Tests of Procedures or Methods to be Undertaken:

Not Applicable.

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

Joseph Gagnier	OCC Statistician	(202)	205-8455
Andrew Williams	Policy Division Director	(202)	401-4795
Helen Papadopoulos	OCC Data Contractor	(301)	692-0586