

**SUPPORTING STATEMENT FOR OMB CLEARANCE
FOR THE ACF-800**

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

**CHILD CARE AND DEVELOPMENT FUND (CCDF)
ANNUAL AGGREGATE REPORT
ACF-800**

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 annual aggregate data on the children and families receiving direct services under the Child Care and Development Fund. The implementing regulations for the statutorily required reporting are at 45 CFR 98.70 and 98.71. Annual aggregate reports include data elements represented in the ACF-800 reflecting the scope, type, and methods of child care delivery. 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 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.

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-800 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 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 80, Number 88, pages 26267-26268) 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-800 including a number of changes and clarifications to the reporting requirements and instructions as set forth below.

1. *Child Fatalities:* Section 658K(a)(2)(F) of the CCDBG Act now requires States to report (for each provider type) the number of fatalities occurring among children while in the care and facility of child care providers serving CCDF children (regardless of whether the child who dies was receiving CCDF). ACF is proposing changes to the ACF-800 to collect this information as required by law.
2. *Consumer Education:* An existing provision of the CCDBG Act, unchanged by reauthorization, requires the ACF-800 to collect information on the manner in which consumer education information was provided to parents and the number of parents to whom such information was provided. In addition, the reauthorization includes a number of new requirements related to consumer education: (a) States must make available by electronic means, easily accessible provider-specific information showing results of monitoring and inspection reports; (b) States must have a website describing processes for licensing and monitoring child care providers, processes for conducting criminal background checks, and offenses that prevent individuals from being child care providers;

and (c) States must provide information to parents and providers, including information about: other programs that assist families; policies regarding expulsions of children from early care and education programs; and developmental screenings for children at risk of cognitive or developmental delays.

In light of the law's new emphasis on consumer education, we are proposing several revisions to the consumer education elements on the ACF-800. First, we propose to delete items 10a through 10g regarding the content of consumer education. Given the law's new specificity regarding consumer education, many of these content areas are now mandatory, and we can collect information on State's implementation status through other mechanisms such as the State Plan. Second, we have added language to the ACF-800 instructions to indicate that States may use data collected through its consumer education website, required by the new law, as one source for calculating the number of families receiving consumer education (item 9). Finally, we've revised item 11 regarding consumer education methods, including by adding referrals to other programs for which parents might be eligible.

Comments were received from California and Maine.

Regarding Child Fatalities, CA currently reports data on child fatalities collected by the Department of Social Services, Community Care Licensing. While it might be possible to have this data broken down by licensed setting by this office, no data is currently collected from facilities exempt from licensure. The new requirement would place additional work on the contractors that operate voucher programs where parents select license-exempt care. As with any new data requirement, it would take time to operationalize, and the data would be self-imported and, therefore, could be unreliable and inaccurate. MN currently does not have access to information on child fatalities in all settings receiving CCDF funds for children who are not receiving CCDF subsidized care. Minnesota can report on child fatalities if the facility is licensed by Minnesota and/or if the child is in subsidized care. Settings where a full set of data are not available include, those licensed by Tribes or other states and those programs that are exempt for licensing under Minnesota law. The State indicates it would be unable to report on this item in the proposed timeline.

Consistent with the reauthorization of the CCDBG statute in November of 2014, the Child Fatalities data element will be required with the reporting period beginning October 2015 (FFY 2016). In addition, OCC suggests that in order for the State/Territory CCDF Lead Agency to report this data, the State establish a mechanism for accurately compiling and aggregating data on the number of child deaths occurring in CCDF-funded child care settings. Unless this data is already being collected within the State, the Office of Child Care (OCC) recommends that CCDF Lead Agencies establish policies and procedures for child care providers serving children receiving CCDF support to report any deaths to a designated State or Territorial agency, such as the licensing agency.

Furthermore, to ensure coordination, OCC also strongly encourages CCDF Lead Agencies to work with their established Child Death Review systems and with the National Center for the Review and Prevention of Child Death Review (www.childdeathreview.org). The National Center for the Review and Prevention of Child Death Review, which is funded by the Maternal and Child Health Bureau in the

HHS Health Resources and Services Administration (HRSA), reports that all 50 states and the District of Columbia already review child deaths through 1,200 state and local Child Death Review panels. (National Center for Child Death Review, Keeping Kids Alive: A Report on the Status of Child Death Review in the United States, 2011) The Child Death Review system is a process in which multidisciplinary teams of people meet to share and discuss case information on deaths in order to understand how and why children die so that they can take action to prevent other deaths. These review systems vary in scope and in the types of death reviewed, but every review panel is charged with making both policy and practice recommendations that are usually submitted to the state governor and are publicly available. The National Center for the Review and Prevention of Child Death Review provides support to local and state teams throughout the child death review process through training and technical assistance designed to strengthen the review and the prevention of future deaths.

No comments were received regarding the revised Consumer Education data elements except from CLASP that “particularly commends the administration for proposing the collection of additional data elements”.

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 an annual 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:	1
Average Burden Hours per Response:	42
Total Burden Hours per Year:	2,352

We estimate that the time required to assemble and transmit the data file will take approximately 42 hours per transmission at an estimated \$25 per hour and \$1,000 per State and Territory, i.e., \$58,800 per year.

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

A change to the reporting burden from 40 to 42 per response has resulted in an associated increase in the annual cost burden from \$280,000 to \$282,800.

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:

CCDBG was reauthorized in November of 2014 requiring a new data element, i.e., Child Fatalities, resulting in a change to the reporting burden from 40 to 42 per response with an associated increase in the annual cost burden from \$280,000 to \$282,800. Revision to the Consumer Education data elements is not expected to change or increase the reporting burden or annual cost estimate.

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

Fiscal Year 1998 through 2014 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:

The expiration date is currently displayed at the top right corner of the Form ACF-800.

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-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. Tests 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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