

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 (CCDBG) Act, 42 U.S.C. 9858, as amended by the CCDBG Act of 2014, Public Law 113-186. To be eligible to receive funds under this program, 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. 9858.

The 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 CCDBG Act of 2014, signed into law on November 19, made significant requirements to the CCDF Program. A revision of the current information collection is being requested to align with the new requirements under the Act.

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 658C of the Child Care and Development Block Grant (CCDBG) Act of 2014, as amended. The Office of Child Care (OCC) reviews the Plan information to determine if the Lead Agency is operating in accordance with applicable statute and regulations. In addition, the information contained in the State and Territory Plans helps the OCC identify trends, best practices, areas that need improvement and to determine if the States and Territories are administering the program in accordance with its approved plan when compliance issues arise. Based on a review of the Plans, the OCC 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 OCC 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 Section 658E(a) and (b), Lead Agencies are required to provide a Plan that describes the entire child care program in detail triennially (every three years).

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.

Due to the pending outcome of the CCDBG reauthorization bill, which was introduced in September and signed into law in November, the Office of Child Care (OCC) was initially unable to complete the regular Paperwork Reduction Act clearance process that calls for two Federal Register notices and comment periods. Given that OCC had to consult with the CCDF administrators and the general public, and the limited amount of time before

the States and Territories had to submit their plans to ACF (July 1, 2015), the Office of Management and Budget (OMB) granted OCC an emergency clearance of the FY 2016-2018 CCDF State/Territory Plan Preprint which provided a single 30-day comment period from January 30, 2015-March 2, 2015, to enable States and Territories time to submit their Plans by July 1, 2015 on the OMB approved form.

Upon careful consideration of the concerns raised by States and Territories regarding the July submission date, OCC extended the submission deadline for the FY 2016—2018 CCDF Plan from July 1, 2015 to March 1, 2016 to give State and Territory grantees more time to engage partner agencies and stakeholders, brief legislators on needed statutory changes, and develop meaningful implementation plans. The extension does not extend the FY 2016-2018 3-year plan period; Plans will be effective from June 1, 2016 through September 30, 2018.

The change in the Plan submission deadline has enabled the OCC to complete the regular Paperwork Reduction Act (PRA) clearance process which requires two Federal Register notices and comment periods. On May 27, 2015, the OCC's first 60-day notice soliciting comments on this information collection was published in the Federal Register at 80 FR 30252. The published draft Plan incorporated public comments from the 30 day emergency comment period. The OCC also sent an email message to State and Territory Lead Agencies and external stakeholders notifying them of the May 27, 2015 Federal Register notice including sending electronic copies of the draft State Plan Preprint.

The FRN and the proposed Pre-Print and other resources and materials were posted on the OCC website to make it available widely. A Program Instruction with guidance on key statutorily required implementation dates have been published on the OCC website and have also been disseminated to States and Territories. The OCC will be providing technical assistance and training on the new changes in the law to ensure that adoption and implementation of the changes are done in a comprehensive manner.

The OCC has revised the FY 2016-2018 Plan to align with the new program requirements made under the CCDBG Act of 2014 as well as public comments received during the 60 day comment period. OCC received comments from 24 entities/organizations, including 6 CCDF State Lead Agencies.

The major themes for the comments were:

- Requests for clarification and guidance to improve Lead Agency's understanding of what is being requested and what is required.
- Request to revise some questions to include greater depth for accuracy
- Request to re-format some questions and sections for consistency and a better flow

Below are highlights of the changes in the following sections:

Section 1

- Clarified language in public hearing, consultation with Tribes, and disaster preparedness sections
- Added agencies to consultation and coordination tables (e.g., public health, mental health, Medicaid)

Section 2

- Clarified language related to age span (birth to 12) and social-emotional and behavioral health

Section 3

- Clarified language related to work, job training and education
- Added clarifications in homeless section
- Clarified language related to a “minimum” of 12 months for eligibility and redetermination periods and irregular fluctuations in income
- Added the opportunity to provide links for eligibility and sliding fee scale
- Added clarifications in copay section

Section 4

- Added clarification regarding use of grants and contracts
- Added the opportunity to provide links to payment rates
- Clarified language around payment rate units
- Clarified language related to payment practices

Section 5

- Clarified language related to exemptions, pre-service/orientation requirements, background checks (3rd party)
- Added language to clarify that training should be age appropriate and appropriate for type of care setting
- Added language to include screen time as optional training category
- Separated requirements related to licensing requirements for ratios/qualifications, inspections, child abuse reporting for more clarity

Section 6

- Modified introduction to look more systematically at workforce issues including stakeholders (CCR&R, higher Ed, CACFP, accrediting organizations, etc.) and the diversity of the providers (language and culture) and the variety of roles (teachers, directors, staff, etc.)
- Added clarifying language related to social-emotional and mental health

Section 7

- Added clarifying language related to quality investments outside of CCDF (e.g., RTT)
- Added language to clarify age span is birth through age 12

- Added language in QRIS section to gather more detail on participation (voluntary or mandatory), link to subsidy
- Added language to strengthen information in infant-toddler quality investments and link back to section 4 (supply-building)

Section 8

- No changes made

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:

| <u>Task</u> | <u>Estimated Hours</u> | <u>Estimated Rate</u> | <u>Total</u> |
|------------------------------------|------------------------|-----------------------|--------------|
| 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 triennially.

15. Explanations of Program Changes or Adjustments

The Office of Child Care (OCC) has revised the FY 2016-2018 Plan to align with the new program requirements made under the CCDBG Act of 2014, which was signed into law on November 19, 2014. In making the revisions, consideration was given to minimize the burden of the collection on respondents. Consistent with previous formats, the Preprint includes a combination of check boxes, certifications, and requests for descriptive information. No adjustments were made to #13 and #14.

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

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When item 16 is checked "Yes," the following

documentation should be included in the supporting statement to the extent that it applies to the methods proposed:

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).