

THE SUPPORTING STATEMENT

The Office of Management and Budget (OMB) requires that for approval under the Paperwork Reduction Act a Supporting Statement must be prepared in the format specified below. Information in the Supporting Statement should be provided in a manner that is responsive to the OMB instructions, and each item must be identified using the numbering system given by OMB. If the Supporting Statement exceeds 10 single-spaced pages in length, there should be a summary not exceeding one page in length which precedes it.

Every effort should be made to keep the Supporting Statement to a length of 10-12 pages. When possible, detailed information should be placed in an attachment, which is then referenced in an appropriate place in the Supporting Statement so that interested reviewers can peruse it. Each attachment should be referenced in the text, so that a reviewer knows why it has been included and which portions may be of particular interest. Brevity and clarity with respect to both the text of the Supporting Statement and any attachments are highly desirable; only the information requested by the OMB outline and needed to understand the project should be included.

This annotated electronic version of the OMB outline for a Supporting Statement has been prepared by the ACF, Office of Planning, Research and Evaluation (OPRE), to assist in the preparation of a request for clearance of an information collection. This template can be downloaded from the PRA E-Office information collection web site.

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must be entered in worksheet I. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.

TRIBAL CHILD CARE AND DEVELOPMENT FUND PLAN

Supporting Statement

1. Circumstances Making the Collection of Information Necessary

To be eligible to receive funds under this program, Section 658E of the CCDBG Act, 42 U.S.C. 9858c, a Tribe or Tribal Organization 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) Requirements of a Plan.

The CCDF Plan Preprint serves as the agreement between the Tribal Lead Agency and the Federal Government as to how the Block Grant program will be operated. The Tribal 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 Tribal Lead Agency CCDF Plan Preprint (ACF Form 118-A) is currently approved through 05/31/2016 (OMB Approval Number 0970-0198). A revision of the current information collection is being requested.

The CCDBG Act of 2014, signed into law in November of 2014 made significant changes to the CCDF program. However, the law did not explicitly indicate the extent to which many of the new requirements apply to Tribes. Questions related to the CCDBG Act of 2014 were added for “informational purposes only” to provide ACF with baseline information on Tribal practices and technical assistance needs. The Plan Preprint aligned questions that relate to 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 Tribal 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 Tribal Lead Agency is operating in accordance with its approved plan when compliance issues arise. In addition, the information contained in the Tribal Plan helps the Office of Child Care identify trends, best practices and areas that need improvements. 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 Tribal Lead Agencies.

The Administration for Children and Families (ACF) has found the CCDF Plan Preprint useful in guiding Tribal Lead Agencies in the development and submission of their Plans. The standardized, “Preprinted” format provides complete program information

necessary to complete the CCDF Plan, and expedites timely reviews by ACF staff. The CCDF Plan Preprint reflects the CCDBG statute and amended regulations. The Plan Preprint serves as a blueprint for Tribal Lead Agencies to assist them in developing a complete Plan, with all of the required elements needed to implement their CCDF programs.

The public takes considerable interest in the way Tribes and Tribal Organizations administer their CCDF funds. The Office of Child Care makes Plan information available to many users including members of Congress, Congressional Committees, Tribes, States, and local child care administrators, advocacy groups, researchers and the public.

3. Use of Improved Information Technology and Burden Reduction

For the upcoming triennial, Tribal Lead Agencies will submit their plans via an editable Microsoft Word document. OCC will be working with Tribal Lead Agencies on the feasibility and usability of an on-line tool for future Plan submissions.

4. Efforts to Identify Duplication and Use of Similar Information

The information collected by the ACF 118-A 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 §98.17 Tribal Lead Agencies are required to provide a Plan that describes the entire child care program in detail triennially.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The collection of information will be conducted in accordance with 5 CFR 1320.5.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency.

The Office of Child Care (OCC) notice soliciting comments on this information collection was published in the Federal Register Notice Vol. 81, No. 11 on Tuesday, January 19, 2016. OCC also sent an email message to Tribal Lead Agencies notifying them of the January 19, 2016 Federal Register notice and included electronic copies of the draft Child Care and Development Fund (CCDF) Tribal Plan Preprint. OCC received comments on the CCDF Tribal Plan Preprint from 2 Tribal organizations.

The major themes from the comments included:

- Request for clarification, definitions and guidance to improve Tribe's understanding of what is being requested and what is required.
- Request for additional clarification, guidance and definitions with a focus on items where there is a potential increased need for technical assistance
- Request for additional guidance in Section 8, the Optional Abbreviated Plan for Tribes Receiving Small Allocations which is a new approach in meeting the smaller tribe's needs.
- Request that guidance boxes be added in some section to allow grantees to better understand what is being requested
- Request additional notations are made for specific questions to be classified as "for informational purposes only" since many of the new provisions clearly apply to states and territories, these provisions do not explicitly apply to tribes. With the understanding that OCC will issue regulations and policy guidance on whether or how these provisions ought to apply to tribes.
- Request to re-format some questions and sections for a better flow.

To summarize our edits which are based on the public comments received, we addressed the following:

- Made grammatical edits throughout the Plan - for example describe vs description and deleted duplicate language;
- Improved the logical flow of information by grouping related topics together;
- Adjusted questions in the Tribal Plan to better align with the Tribal Annual Report (ACF-700), which collects annual data on Tribal children and families receiving CCDF funded child care services;
- Deleted the section title "Discretionary Targeted Funds for School Age/ Resources and Referrals" as Congress removed the funds for this population from the annual CCDF-allocation;
- Added check boxes to reflect commonly known terms pertaining to the health and safety section to capture relevant activities being conducted by the Tribes;
- Added language to reiterate the 4 percent expenditure requirements for Non-Exempt tribes;
- Modified language to clarify and describe "Non-Exempt" and "Exempt" relating to the Certificate/Vouchers and categories of care offered; and
- Include questions that are optional - meaning Tribes can respond with a "no" as these questions do not yet apply to Tribal grantees and are "for informational

purposes only” and have been marked with a red delta symbol pending release of new CCDF regulations.

Tribes are afforded continuous opportunities for input into the design of the Plan. Prior to the Federal Register Notice publication, the OCC conducted Tribal Consultation to hear from Tribes their concerns and issues regarding Tribal CCDF programs. We are providing eight Plan Preprint training sessions throughout the ACF Regions where Tribes will receive a comprehensive hands on approach in how to complete the FY 2017-2019 CCDF Tribal Plan Preprint.

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 broken out to reflect the estimated hours based on (1) the CCDF Plan Preprint Section 1-7 with optional questions, (2) the CCDF Plan Preprint Section 1-7 without optional question, and (3) the CCDF Abbreviated Plan Section 8. Tribal grantees, regardless of funding level have the option to respond to all questions or only the mandatory questions in Section 1 – 7. Tribes with total allocations of less than \$250,000 have the option to complete Section 8 only (the Abbreviated Plan). Total cost is projected to be approximately \$2,500.

Instrument	Number of Respondents	Number of Responses Per Respondent	Hours Per Response	Response Burden
1) CCDF Plan Preprint Section 1-7 with optional Questions	85	.5	120	5,100

2) CCDF Plan Preprint Section 1-7 – Without optional questions	85	.5	80	5,100
3) CCDF Plan Preprint Section 8 (Abbreviated Plan)	87	.5	40	5,220

Total burden is 15,420 hours.

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

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

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	80	\$30.58	\$ 2,446.40
Tribal Plan Review	40 * 257 Plans = 10,280	\$30.58	\$314,362.40
		Total	\$316,808.80

NOTE: Plans are submitted triennially.

15. Explanations of Program Changes or Adjustments

Program updates were made to provide additional guidance and clarification to Lead Agencies to improve the quality of the information requested. Additional revisions were also made to identify those questions related to the CCDBG Act of 2014 that were added for “informational purposes only”. These revisions did not require changes or adjustments to the annual cost burden to respondents or the annualized costs to the Federal Government. The revisions have no effect on hourly burden.

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-A is not the type of information that may be collected by statistical methods. Statute requires Tribes and Tribal Organizations 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).