

SUPPORTING STATEMENT

Specific Instructions

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Office of Child Care (OCC), Administration for Children and Families, requires Child Care and Development Fund (CCDF) Tribal Lead Agencies (TLAs) to report annual aggregate data on children and families served in Tribal programs on the ACF-700 report form. This report is required by sections 98.70 and 98.71 of the CCDF Final Rule (45 CFR Parts 98 and 99). This information will be included in the Secretary's Report to Congress, as appropriate, and will be shared with all TLAs to inform them of CCDF or Child Care and Development Block Grant-funded (CCDBG) activities in other tribal programs.

2. Purpose and Use of the Information Collection

The purpose of this collection is to obtain data from CCDF Tribal grantees that are required to submit an annual report by the CCDF Final Rule (45 CFR Parts 98 and 99). This report provides data regarding the Tribe's efforts to provide affordable and quality child care using CCDF funds. The data document the numbers of children and families served across all Tribal child care programs, as well as the types of child care settings used. This information assists the OCC in determining trends and possible technical assistance needs for Tribal CCDF grantees. Another function of this information is to assist in determining if Tribes are operating in accordance with their approved CCDF three-year plans, should compliance issues occur. CCDF-funded grantees that receive funding under Pub.L. 102-477 are not required to submit the ACF-700.

3. Use of Improved Information Technology and Burden Reduction

TLAs can utilize automated collection techniques or other forms of information technology. Beginning in 1999, Tribes were provided the option to submit their ACF-700 data through an internet-based submission website. Since that time, electronic reporting has continuously increased. For fiscal year 2015, approximately 99 percent of the Office of Child Care's TLAs who submitted their ACF-700 report, did so electronically through the ACF-700 internet submission website: <https://extranet.acf.hhs.gov/acf700/login/login700.jsp>. Note that 36 of the 260 TLAs are not required to submit an ACF-700 report since they are Pub.L. 102-477 grantees submitting one combined report to the Department of Interior. Information and on-line technical assistance support related to the ACF-700 internet submission is also available at <http://www.acf.hhs.gov/programs/occ/resource/acf-700-tribal-annual-report>.

If a TLA does not have Internet access, they may submit a hard copy of the ACF-700 report, but are encouraged to submit the report using compatible electronic media, including email attachments. The ACF-700 form may be downloaded in electronic format from the OCC's website at <http://www.acf.hhs.gov/programs/occ/resource/data-reporting-for-indian-tribes-acf-700-form>.

A Tribal Annual Report: Guide for CCDF Tribal Lead Agencies (ACF-700) is made available each year providing step-by-step technical assistance to help TLAs complete the ACF-700 form. This Guide is available on the OCC's website at: <http://www.acf.hhs.gov/programs/occ/resource/tribal-annual-report-guide-for-ccdf-tribal-lead-agencies> .

4. Efforts to Identify Duplication and Use of Similar Information

There is no similar information already available.

5. Impact on Small Businesses or Other Small Entities

The collection of the information does not involve small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

This information is collected annually as required by 45 CFR 98.70(c) of the CCDF Final Rule which was published on July 24, 1998.

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 OCC's notice soliciting comments on this information collection was published in the Federal Register on April 13, 2016, at Volume 81, Number 71, page 21881. Two official public comments were received in response to this notice from Pub.L. 102-477 Tribes. Both comments requested that the instructions on the ACF-700 make it clear that Tribes receiving CCDF funds under Pub.L. 102-477 are not required to submit the form. We have added a statement on the form and to the instruction guide, which makes it clear Pub.L. 102-477 Tribes are exempt for this reporting requirement.

Comments were also received from the National Indian Child Care Association (NICCA). NICCA conducted a survey of Tribal CCDF programs and child care leaders and based on the results submitted comments on the ACF-700. NICCA agreed with the OCC to develop tools that can accurately capture the stories of Tribal CCDF programs and that the ACF-700 is a "great tool for Tribal CCDF programs to share their data, progress, and stories of their programs, especially to quantify the number of families they are serving and how they are using their funding." OCC agrees with NICCA's request for technical assistance (TA) on how the Category/Type of Child Care in the ACF-700 aligns with the Categories of Care in the Tribal Plan Pre-Print, rather than change the form. NICCA also requested to add options for narrative responses and/or lists of topics to determine unmet technical assistance needs. In Part 2 of the ACF-700, there is space available after each item where additional information can be provided. NICCA also requested OCC to add lists of topics for technical assistance. OCC made no changes to the ACF-700, as this would require OCC to develop definitions of terms, which would be inconsistent with OCC's desire to allow maximum flexibility to TLAs to define their own terms. In addition, OCC Regional Staff and staff of the National Tribal Center engage in regular and frequent communications with TLAs and therefore better able to

determine specific TA needs and solutions. NICCA also requested for an item to be added where TLAs can provide narrative statements of interest related to their programs, which are not otherwise addressed in the ACF-700. OCC agrees with NICCA and has added an open-ended, but optional, question at the end of the ACF-700 form for this purpose. Lastly, NICCA requested OCC to establish a committee of tribal CCDF grantees to revise the Tribal Child Care Data Tracker, as in their opinion it does not meet the needs of the TLAs. OCC has to date revised the Tribal Child Care Data Tracker several times. While it is not known how many TLAs actually use the tool, we will take this recommendation under consideration as we will be awarding a new technical assistance contract in FY 2017 and will take a fresh look at the issue.

The OCC has routinely consulted with Tribal grantees regarding their needs and recommendations as related to the CCDF reporting requirements which are in part represented by the ACF-700 Report. Between February - June 2015, the OCC held five tribal consultation sessions to solicit input on the CCDBG Act of 2014. Many of the comments were supportive of the overall direction of CCDF reauthorization and emphasized the need for more quality Tribal data. Based on those recommendations, language in the report has been previously modified to further clarify the intent of the items and the required responses. The ACF-700 has been revised to include two required sections: 1) Administrative Data and 2) Tribal Narrative. The ACF-700 has been revised to make the report more streamlined, cohesive, and easier to complete, with new check-box formatting for the narrative section. The report has also been aligned with the CCDF Tribal Plan. These changes will help the OCC better understand tribal activities as they relate to compliance, quality of child care, use of funds, and technical assistance needs. The proposed revisions will also allow the OCC to generate and quantify data in an easier manner.

An additional outcome of prior consultation was the development of the *Child Care Data Tracker*. The *Tracker*, a case management software tool, was designed to assist TLAs with case management functions such as tracking family and provider information. The *Tracker* also has the capability of generating a completed ACF-700 report automatically based on information grantees enter into the software however, use of the tool is optional. The *Tracker* was officially introduced at the 7th National American Indian and Alaska Native Child Care Conference in Kansas City, Missouri, in April 2001, and has since been updated several times to encompass changes recommended by Tribal grantees.

The OCC provides extensive technical assistance (TA) to Tribal grantees for questions or problems related to their reporting requirements. The National Center on Tribal Child Care Implementation and Innovation, a contractor to the OCC, conducts training sessions, facilitates workshops, and delivers individualized TA to all Tribal grantees across the country. That ongoing TA has allowed the OCC to maintain ongoing communication with grantees, receiving feedback and suggestions from them as well as providing information to them. Their input is evaluated whenever changes to program requirements are considered.

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts are provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

There is nothing of a confidential nature in the document; therefore,

respondents will not be provided an assurance of confidentiality.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
ACF-700 form (CCDF Annual Tribal Report)	260	1	38	9,880

Estimated Total Annual Burden Hours: 9,880

The burden is estimated based on experience with prior activities.

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

There are no direct monetary costs to TLAs other than the time to complete the report.

14. Annualized Cost to the Federal Government

The annual cost to the Federal Government is estimated at \$43,904. This is based on the annual submission of the ACF-700 form, requiring approximately 336 professional staff hours at an average of \$102 per hour (\$34,272; 172 clerical hours at an average of \$56 per hour (\$9,632).

15. Explanation for Program Changes or Adjustments

A section has been added at the end of the form where grantees may provide any additional information they choose. A statement was added to the ACF-700 and to the instructions to make it clear that Pub.L. 102-477 grantees are exempt from completing the form.

16. Plans for Tabulation and Publication and Project Time Schedule

The results of this information collection will be summarized and will be included in the annual CCDF Report to Congress, as appropriate. It may also be made available on the Office of Child Care's website at <http://www.acf.hhs.gov/programs/ccb>.

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

The expiration date for the OMB approval will be displayed on the information collection.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification for Paperwork Reduction Act submissions.

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

The information collection report does not use statistical methods.