

**Child Care Access Means Parents in School (CCAMPIS) Program
Summary of Public Comments on
Proposed Changes to the 2018 Annual Performance Report (APR)
Following 60 Day Review Period**

On October 30, 2018, the Department of Education (Department) published a Notice of Proposed Information Collection Request (Notice) in the Federal Register inviting comments by December 31, 2018, on the proposed annual performance report (APR) for the Child Care Access Means Parents in School (CCAMPIS) Program. The Department received comments from one organization. There were a variety of comments related to the clarity of the Annual Performance report definitions, instructions and general reporting questions. To this end, the Department reviewed each of the comments and concerns and provided responses as well as made revisions to the APR, where applicable.

Below are a summary and discussion of the comments on the proposed CCAMPIS APR as well as the information on the actions taken by the Department. Minor changes of a technical nature (e.g., typographical errors) have been made to the revised APR form and instructions but are not discussed below.

General comments

Comments: The Commenter suggests that the Department consider increasing the amount of time institutions have to complete the annual performance report. They say that the report asks for a lot of data and more time would ensure accuracy of information.

Discussion: The Department considers 30 days an appropriate amount of time to submit an accurate performance report. Grantees are informed at the time of the new award that a performance report is required to be submitted annually.

Action taken: None

Section II Definitions

Comments: The commenter requested that the definition of years used in the definition of “years taken to transfer/completion” (i.e. academic years versus calendar years, or, for example, total months enrolled prior to completion or transfer divided by 12) be clarified.

Discussion: The Department believes the CCAMPIS instructions clearly define “years taken to transfer/completion.” Academic terms vary by institution, so to assign a specific measurement (e.g. academic years versus calendar years) may hinder a grantee’s ability to accurately report information.

Action taken: None

Section III-A Instructions

Comments: The commenter requests that the Department provide data on past program participants that has already been submitted by grantees rather than requesting that they resubmit old data each year. They ask that the Department consider creating a way for grantees to easily import data from past years or to copy and paste past reports into the form rather than requiring them to manually input the data.

Discussion: The Department does not require CCAMPIS grantees to report on past program participants. The CCAMPIS program is not cohort based; all data provided should be specific to the report year.

Action taken: None

Section III-A Annual Performance Report Data-Survey Tables

Comments: The commenter suggests that the Department disaggregate the information collected by the type of program in which students are enrolled (e.g. certificate, associate degree, bachelor's degree, or graduate program). Time to degree will vary by program and degree type, and students' on-time graduation should be measured accordingly. They also ask that the Department acknowledge that student parents' enrollment trends tend to be more sporadic than "traditional" college students, and that they are likely to be working while in school and/or attending school part-time.

Discussion: The Department aggregates CCAMPIS data because the data is specific to that individual reporting year. The Department is aware that time to degree will vary by program and degree type. The Department is also aware that student parents' enrollment trends tend to be more sporadic than those of "traditional" college students.

Action taken: None

Section III-B #1-5

Comments: The commenter requests that the Department list exact fiscal years on which grantees should report and add a question requesting the "total actual number of CCAMPIS student parents graduating from the 2-year institution (but not transferring to a 4-year) in the reporting year" with the same response options ("certificate," "with a diploma (AA)," and "without a diploma").

Discussion: The Department uses the APR for several years after OMB clearance. Grantees are able to use the drop down box provided to enter the report year. The Department collects the 2-year graduation data in Section III – A participant demographics, attendance, persistence, and graduation.

Action taken: None

Section III-B question 7

Comment: The commenter suggests that the Department provide technical assistance to grantees that may not have access to information on students' transfer to four-year institutions by helping them gather that data from the National Student Clearinghouse.

Discussion: The Department agrees that technical assistance is necessary to help grantees accurately complete the APR.

Action taken: The Department will be conducting an APR technical assistance workshop at the N4C conference.

Section III-B question 8

Comment: The commenter asks that the Department clarify that "degree seeking students" refers to undergraduate students.

Discussion: The Department believes the graph displayed differentiates between the degree types. "Degree seeking students" is referring to students seeking an associate or bachelor's degree from an institution.

Action taken: None

Section III C #1, #2, #4

Comment: The commenter suggests that the Department simplify or combine questions one, two, and four of Section III-C to provide clarity to respondents.

Discussion: The Department believes that the questions, as written, adequately and clearly address the information requested.

Action taken: None

Section III-C #3

Comments: The commenter suggests that the Department add a question to the APR asking students who are enrolled but who no longer need CCAMPIS support why they no longer need that support.

Discussion: The Department does not require CCAMPIS grantees to collect that data. It was suggested that CCAMPIS grantees collect that data on their student parent survey.

Action taken: None

Section III-C #6

Comments: The commenter suggests that the Department revise the question options and use a traditional Likert scale format.

Discussion: The Department agrees that the question is confusing and could use more clarity.

Action taken: The Department has made the following revision to Section III-C, question six: “Please indicate the total number of student-parents responding and the number of student-parents selecting each specific response.”

Section III-C-Open-Ended Question on Student Parents’ Academic Outcomes

Comments: The commenter suggests that the Department include examples of information desired by this question. (e.g. the number of participants on track to graduate or transfer successfully, relevant employment outcomes, anecdotal stories of how CCAMPIS has enabled participants to succeed or the importance of the program to their feelings of acceptance and belonging, or other information).

Discussion: The Department agrees that more guidance can be provided to respondents to get relevant information.

Action taken: The Department has made the following revision to Section III–C open-ended question: “Please enter any additional information on CCAMPIS student-parents’ academic outcomes such as the number of participants on track to graduate or transfer successfully, relevant employment outcomes, anecdotal stories of how CCAMPIS has enabled participants to succeed or the importance of the program to their feelings of acceptance and belonging, or other information.”

Section IVA-CCAMPIS Program-Funded Services Provided for Participants

Comments: The commenter suggests that the Department add an additional column to collect data on the number of parents served, in addition to the number of children.

Discussion: The Department agrees with commenter.

Action taken: The additional column was added with the header “Total number of participants (Optional).”

Section IV-C, #1-5

Comments: The commenter suggests that the Department revise these questions to read “children of student parents” instead of “student-parents and children” to capture the number of children on the wait list and add additional blanks to also collect the number of parents on the wait list.

Discussion: The Department agrees with the commenter.

Action taken: The Department has made the following revision to Section IV-C, #1-5: student parents was taken out and now the question reads: “1. Number of CCAMPIS-eligible children on

wait list at the beginning of the 2017-18 academic year by age groupings (applicable to awards beginning P335A17).”

Section V

Comments: The commenter suggests that the Department add the Child Care and Development Fund (CCDF) grant as an additional funding type.

Discussion: The Department believes the Child Care and Development Fund (CCDF) would be accurately reported under option B since it is administered by states, territories, and tribes.

Action taken: None

Section V-H

Comments: The commenter requests that the Department create two new questions to capture this information: Explain if and how funds have been leveraged from institutions and/or local resources to support child care activities for low-income (Pell grant eligible/CCAMPIS program-eligible) student-parents.

Discussion: The Department determined this question is sufficient for gathering the required data.

Action taken: None

Qualitative data

Comments: The commenter suggests adding an optional section where institutions can include comments from student parents on the impact of CCAMPIS on their educational and employment goals and on their families’ well-being, a place to report persistence and graduation rates, and the average time to completion of CCAMPIS participants.

Discussion: The Department uses the information collected in the APR to analyze grantees' performance to determine which grantees need technical assistance and to make programmatic and funding decisions. Requiring such a collection may increase the burden on grantees. The department does not calculate average time to completion of CCAMPIS participants.

Action taken: None