

Child Care and Development Fund (CCDF) Plan Preprint for States and Territories

**OMB Information Collection Request
0970 - 0114**

Supporting Statement Part A - Justification

May 2019

Submitted By:
Office of Child Care
Administration for Children and Families
U.S. Department of Health and Human Services

SUPPORTING STATEMENT A – JUSTIFICATION

Summary

The Office of Child Care (OCC) requested and was granted clearance from the Office of Management and Budget (OMB) for this FY 2019-2021 CCDF Plan Preprint under emergency clearance procedure for six months with an expiration date of November 30, 2018. This information collection request is to reinstate this data collection for States' and Territories' Lead Agencies to use this document for a three year period, from October 1, 2018 through September 30, 2021.

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 Act of 1990 (CCDBG Act), 42 U.S.C 9858 as amended by the Child Care and Development Block Grant Act of 2014, Public Law 113-186. To be eligible to receive funds under this program, Section 658E of the CCDBG Act, 42 U.S.C. 9858c, 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. 9858c(c).

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 658E(d) of the Child Care and Development Block Grant (CCDBG) Act of 2014 (42 U.S.C. 9858c and 9858m), as amended. The OCC reviews the Plan information to determine if the Lead Agency is operating in accordance with its approved plan. 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 the CCDBG Act and amended regulations. 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 submit their Plans electronically through a web-based on-line submission tool designed by OCC. OCC continues to work with Lead Agencies on the usability of this on-line submission. The use of checkboxes in the Preprint 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 45 CFR 98.13, 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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and OMB

regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency’s intention to request an OMB review of this information collection activity. This notice was published on January 31, 2019, Volume 84, Number 21, page 738, and provided a sixty-day period for public comment.

Throughout fall of 2018, OCC announced at multiple events including the annual State and Territory Administrators’ Meeting (STAM) and national calls held during the Plan review period, the forthcoming publication of this information collection in the Federal Register. We did not receive any comments during the sixty-day public comment period.

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 200 hours per response. This includes the time for reviewing instructions, gathering and maintaining the data needed, and completing the CCDF Plan Preprint every three years. Total cost is projected to be approximately \$147,840 (3,696 * \$40/hour).

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
CCDF Plan Preprint	56	.33	200	3696	\$40.00	\$147,840
Estimated Annual Burden Total:						\$147,840

Example of description of costs for Social and Human Services Assistants with 100 hours of burden:

The job code is 21-1093 and wage data from May 2018 is \$20.00 per hours. Therefore to account for fringe benefits and overhead the rate is multiplied by two which is \$40.00. The estimate of annualized cost to respondents for hour burden is \$40.00 times 3,696 or \$147,840.

<https://www.bls.gov/oes/current/oes211093.htm>

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 Cost to the Federal Government

The annual costs to the Federal Government are projected as follows:

Task	Estimated Hours	Estimated Rate	Total
Preprint Design	160	\$30.58	\$ 4,892.80
State/Territory Plan Review	40 * 56 Plans = 2,240	\$30.58	\$68,499.20
		Total	\$73,392

NOTE: Plans are submitted triennially.

15. Explanation for Program Changes or Adjustments

ACF is requesting a reinstatement of the form ACF-118, so no program changes or adjustments were made to the form.

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 Submissions

There are no exceptions.

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Supporting Statement Part B – Statistical Methods

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