

**Child Care and Development Fund (CCDF) Tribal Annual Report
ACF-700**

**OMB Information Collection Request
0970 - 0430**

**Supporting Statement Part A -
Justification**

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

Summary

The Child Care and Development Fund (CCDF) Tribal Annual Report (ACF-700) requests Tribal Lead Agencies (TLAs) to provide annual Tribal aggregate information on services provided through the CCDF, which is required by CCDF regulations (45 FR parts 98 and 99). The revised ACF-700 report consists of an introductory section that provides program characteristics and two parts: (1) Administrative Data, and (2) Tribal Narrative. The content and format of the entire form have been revised to address Child Care and Development Block Grant (CCDBG) Act of 2014 changes and to reduce the reporting burden to TLAs.

SUPPORTING STATEMENT 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 using the ACF-700 report form. This report is required by 42 U.S.C. 9857, and sections 98.70 and 98.71 of the CCDF Final Rule (45 CFR Parts 98 and 99). This information will be included in the biennial CCDF Report to Congress, as appropriate, and will be shared with TLAs to inform them of CCDF or Child Care and Development Block Grant-funded (CCDBG) activities in other tribal programs.

CCDF-funded grantees that receive funding under Pub. L. 102-477 are not required to submit the ACF-700 since they submit a report to the Department of Interior (OMB #1076-0135).

2. Purpose and Use of the Information Collection

The purpose of this collection is to obtain data from CCDF TLAs 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 and characteristics of families and children served across Tribal child care programs, as well as the types of child care settings used. This information assists the OCC in:

- (a) including information about the CCDF tribal program in the biennial CCDF Reports to Congress, as appropriate,
- (b) determining trends and possible technical assistance needs for Tribal CCDF grantees, and
- (c) determining if Tribes are operating in accordance with their approved CCDF three-year plans.

3. Use of Improved Information Technology and Burden Reduction

Beginning in 1999, TLAs 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 2018, approximately 99% 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>. Information and on-line technical assistance support related to the ACF-700 form is also available at https://www.acf.hhs.gov/sites/default/files/occ/acf_700_guide_fy2018_final_102618_508_compliant.pdf. This guide is updated annually and is shared with TLAs to help them complete the ACF-700 form.

4. Efforts to Identify Duplication and Use of Similar Information

With the changes incorporated in the ACF-700 form, OCC identified duplicative questions that were asked in the CCDF Tribal Plan (ACF-118a) (OMB #0970-0198) and removed them from the ACF-700 collection.

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. The data is submitted annually on the last day of the calendar year (December 31), and covers the most recent Federal fiscal year (October through September).

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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (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 June 18, 2019, Volume 84, Number 117, page 28305, and provided a sixty-day period for public comment. During the notice and comment period, two (2) comments were received, which are attached.

The first comment was received from a large allocation Tribe regarding how to report contracted slots. The second set of comments were received from a small allocation Tribe regarding reporting requirements for small Tribes, tribally operated centers, categorical eligibility, and software to collect and report mandated data. These comments highlight the technical assistance (TA) needs TLAs have to better understand the reporting requirements.

The OCC provides extensive TA to TLAs for questions related to their reporting requirements. The National Center on Child Care Data and Reporting, contractor to the OCC, conducts training sessions and delivers individualized TA to Tribal grantees across the country. OCC publishes Technical Bulletins (TB) available at <https://www.acf.hhs.gov/occ/resource/current-technical-bulletins>. For example, TB #11, Question 1 under Section IV addresses which children and families should be reported (in response to the first question), where guidance on how to report care from different care types is in the Tribal Guide available at https://www.acf.hhs.gov/sites/default/files/occ/acf_700_guide_fy2018_final_102618_508_compliant.pdf.

With the roll-out of reporting change(s), OCC conducts national and regional training sessions, with the help of its contractor, to review the changes to the reporting requirements, address questions such as the comments we received, and ensure Tribal grantees know where to find resources available to them with detailed guidance, such as Technical Bulletins and the Tribal Guide. These materials will be updated again to reflect reporting requirement changes.

Lastly, in response to the need for software to collect and report data, the Office of Child Care introduced the Child Care Data Tracker software (referred to as the Tracker) in April 2001. The Tracker is a case management software tool, and was designed to assist TLAs with case management functions such as tracking family and provider information. The Tracker has the capability to generate a completed ACF-700 report automatically based on information grantees enter into the software. However, the use of this tool is optional. Since 2001, OCC has updated the software several times to encompass changes to the reporting requirements and changes recommended by Tribal grantees, and intends to update it again to reflect reporting changes.

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 ACF-700 form contains aggregate data and does not contain family/child confidential information. 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

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent (three years)	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
CCDF Annual Tribal Report ACF-700	138 (Tribes with small allocation)	3	19	7,866	2,622	\$34.44	\$90,302
CCDF Annual Tribal Report ACF-700	83 (Tribes with medium/large allocation)	3	26	6,474	2,158	\$34.44	\$74,322
Estimated Annual Burden Total:					4,780	Estimate d Annual Cost Total:	\$164,624

Social and Human Service Assistants: The job code is 21-1093 and mean hourly wage from May 2018 is \$17.22 per hour. To account for fringe benefits and overhead the rate is multiplied by two, which is \$34.44 per hour. See <https://www.bls.gov/oes/current/oes211093.htm>

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

Operational costs for computer equipment will average about \$1,000 a year per TLA (respondent), i.e., \$221,000 per year. The total annual cost, including burden hours, will total \$385,624 (i.e., \$164,624 plus \$221,000).

14. Annualized Cost to the Federal Government

ACF accepts ACF-700 reports via a secure web submission site. System edit checks provide immediate feedback concerning the accuracy of the submitted data. The electronic system performs audit checks and provides feedback to TLAs. In addition, program analysts review the information to ensure consistency and contact grantees as necessary when information is incomplete or questionable. Maintenance, enhancements to the ACF-700 web site, and provision of technical assistance/training to TLAs for submitting the ACF-700 report are estimated to cost approximately \$85,000 per year.

15. Explanation for Program Changes or Adjustments

The Child Care and Development Block Grant (CCDBG) Act of 2014 reauthorized and re-envisioned the CCDF program. A final rule was published in 2016 that specified how the revised programmatic requirements applied to Tribes. To reflect regulatory changes (such as categorizing TLAs by their funding allocation as small, medium, large) in the Tribal Annual Report (ACF-700), and to reduce the reporting burden to Tribal grantees, OCC proposes changes to the ACF-700 form. Examples of these changes include revising the format of the form and removing some questions from Part 1–Administrative Data and Part 2-Tribal Narrative.

16. Plans for Tabulation and Publication and Project Time Schedule

The results of this information collection will be summarized and included in the annual CCDF Report to Congress, as appropriate.

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.