

To: Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget (OMB)

From: Office of Child Care (OCC)
Administration for Children and Families (ACF)

Date: December 2, 2019

Subject: NonSubstantive Change Request – Child Care and Development Fund - Reporting Improper Payments - Instructions for States (OMB #0970-0323)

This memo requests approval of nonsubstantive changes to the approved information collection, Child Care and Development Fund - Reporting Improper Payments - Instructions for States (OMB #0970-0323). Since approval of this information collection in October 2018, the Office of Child Care has identified some necessary edits to instructions and the associated information collections. These updates are minor, to correct errors or to clarify the text. They do not impact the substantive content of the information collection nor the estimated time per response.

The following table provides an overview of the proposed changes within the Data Collection Instruments (DCI).

| DCI Document | Change | Location | Justification |
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| Sampling Decisions, Assurances, and Fieldwork Preparation Plan (SDAP) | Corrected the OMB number | SDAP page 57 | The number “3” had been left off inadvertently. |
| Record Review Worksheet (RRW) Missing or Insufficient Documentation (MID) Table (instructions only) | Deleted duplicate words | DCI page 35 Column 6 | Removal of duplicate word for clarity |
| RRW MID Table (Instructions only) | Clarify instructions regarding totaling (so states will not incorrectly double the \$ figures) | DCI page 36 2B,2E | States may have a potential improper payment that is the same dollar amount caused by two different errors documented in two different elements on the RRW. The instructions should clarify that if the dollar error refers to the same dollars, the state should only count that amount once and not add |

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| | | | the two together which will incorrectly double the amount. |
| ACF-404 | Item #9b remove language instructing states to apply their pooling factor here | DCI Page 72 Attachment 3 DCI Page 43 Instructions DCI Page 44 Part II Error Measures Reporting section | For Item #9B, states are using dollars to which any pooling factor has already been applied. To apply it again would result in inaccurate data. |
| ACF-404 | Item #15b and c Change wording to say, “Provide pooling factor from the relevant ACF-800 reporting form.” Instead of “recent ACF-800 reporting form.” | DCI Page 72 Attachment 3 DCI Page 45 #15b & c | Since states report on a three-year cycle, it may be confusing to them to ask them to use data from the “most recent” ACF-800 reporting form. It will make more sense to them if we ask them to provide the pooling factor from the “most relevant” ACF-800 reporting form. |
| ACF-404 (instructions only) | Change instructions for 9A – remove “Enter the sum of the number “0” responses to column 7 of the MID tables” Change to “Enter the difference between 7A and 8A” | DCI Page 44 #9A | Updated the language for clarity. The steps states take are the same, but the updated instructions are easier to understand. |
| ACF-404 (instructions only) | Change instructions for 9B – remove “Enter the sum of the differences between columns 3 and columns 8 on the MID Tables. Apply the state’s pooling factor if pooled funds were used.” Change to “Enter the difference between 7B and 8B” | DCI Page 44 #9B | Updated the language for clarity. The steps states take are the same, but the updated instructions are easier to understand. |
| ACF-405 | Change due date to 60 days after submission <i>deadline</i> of the ACF-404 instead of 60 days after | DCI Page 5 DCI Attachment 4 Introductory | Updated for accuracy – the due date is 60 days after the <i>deadline</i> for ACF-404 submission (not 60 days |

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| | submission of the ACF-404. | paragraph DCI Page 48 Change the instructions | after the state actually submitted their ACF-404 report). See 45 CFR 98.102(c)(1). |
| ACF 405 | Change “any state with an error rate at or above 10%” to “any state with an error rate that exceeds the threshold (10%)” | DCI Page 5-Introduction DCI Page 48 - Section VIII | Updated for accuracy. See 45CFR 98.102(c). |