

## CHILD CARE AND DEVELOPMENT FUND PLAN

### Supporting Statement

#### 1. Circumstances Making the Collection of Information Necessary

The authorization to require the submittal of a Quality Progress Report (QPR), 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 (CCDBG) Act (42 U.S.C. § 9858 *et seq.*), as amended by the CCDBG Act of 2014 (Pub. L. 113-186); section 418 of the Social Security Act (42 U.S.C. § 618); 45 CFR Parts 98 and 99 and the final rule. The QPR collects information from states and territories on how to quality funds were expended, including the activities funded and the measures used to evaluate progress in improving the quality of child care programs and services for children from birth to age 13.

The annual data provided will be used to describe state and territory priorities and strategies to key stakeholders, including Congress, federal, state and territory administrators, providers, parents, and the public.

Specifically, this report will be used to:

- Ensure accountability for the use of CCDF quality funds, including a set-aside for quality infant and toddler care that begins in FY 2017.
- Track progress toward meeting state- and territory-set indicators and benchmarks for improvement of child care quality per what they described in their CCDF Plans;
- Summarize how the Lead Agency is building a progression of professional development for child care providers as envisioned in the CCDBG Act of 2014; and
- Inform federal technical assistance efforts and decisions regarding strategic use of quality funds.

A revision of the current information collection is being requested to align with the new requirements under the Act.

#### 2. Purpose and Use of the Information Collection

Lead Agencies are required to spend a certain percentage of their Child Care and Development Fund (CCDF) awards on activities to improve the quality of child care. They are also required to invest in at least one of 10 allowable quality activities included in the Child Care and Development Block Grant (CCDBG) Act of 2014. In order to ensure that States and Territories are meeting these requirements, the CCDBG Act and the

CCDF final rule require Lead Agencies to submit an annual report that describes how quality funds were expended, including what types of activities were funded and measures used to evaluate progress in improving the quality of child care programs and services.

The Quality Progress Report (QPR) replaces the Quality Performance Report that was previously an appendix to the CCDF State Plan. The QPR increased transparency on quality spending and will continue to gather detailed information on how States and Territories are spending their quality funds, as well as more specific data points to reflect the requirements in the CCDBG Act and the CCDF final rule.

In the QPR, Lead Agencies are asked about the State's or Territory's progress in meeting its goals as reported in the CCDF Plan, and provide available data on the results of those activities. Specifically, this report will: 1) ensure accountability for the use of CCDF quality funds, including a set-aside for quality infant and toddler care that begun in FY 2017; 2) track progress toward meeting State- and Territory - set indicators and benchmarks for improvement of child care quality per what they described in their CCDF Plans; 3) summarize how the Lead Agency is building a progression of professional development for child care providers as envisioned in the CCDBG Act of 2014 and CCDF final rule; and 4) inform federal technical assistance efforts and decisions regarding strategic use of quality funds.

The information contained in the QPR helps the OCC identify best practices and areas that need improvement and to determine if the States and Territories are administering the CCDF program with its approved plan when compliance issues arise. Based on a review of the QPR, 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 QPR useful in guiding Lead Agencies in the development and submission of their quality performance reports. The format provides complete program information necessary to complete the QPR, ease the burden on States and Territories, especially with the inclusion of check boxes, and expedites timely reviews by ACF staff.

The public takes considerable interest in the way States and Territories administer their CCDF funds. With the focus on transparency, the QPR allows Lead Agencies to provide the public an opportunity to comment on the provision and quality of child care services under the Plan. The OCC also makes CCDF Plan and QPR 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 have the opportunity to submit their QPRs electronically as OCC has designed an on-line submission tool for Lead Agencies to enter their information on the Web. OCC will continue to work with Lead Agencies on the usability of this on-line submission. The extensive use of checkboxes were designed and formatted to make the QPR suitable for an electronic submission process.

#### **4. Efforts to Identify Duplication and Use of Similar Information**

The information collected by the QPR 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**

This report meets the requirements in the Child Care and Development Block Grant (CCDBG) Act of 2014 for Lead Agencies to submit an annual report that describes how quality funds were expended.

#### **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.**

**FRN Vol. 82, No. 69 page 17667 published on 04/12/2017**

The revised QPR gathers basic data on the State and Territory goals for quality improvement and on the number of programs and providers benefiting from quality improvement investments. The report is organized according to the 10 authorized activities for the use of quality funds specified in the CCDBG Act of 2014, as included in Section 7 of the Child Care and Development Fund (CCDF) Plan:

1. Support the training and professional development of the child care workforce (as described in Section 6 of the CCDF Plan).
2. Improve the development or implementation of early learning and development guidelines (as described in Section 6 of the CCDF Plan).
3. Develop, implement, or enhance a quality rating and improvement system for child care providers.
4. Improve the supply and quality of child care for infants and toddlers.
5. Establish or expand a statewide system of child care resource and referral services.
6. Support compliance with State or Territory requirements for licensing, inspection, monitoring, training, and health and safety.

7. Evaluate the quality of child care programs in the State or Territory, including how programs positively impact children.
8. Support providers in the voluntary pursuit of accreditation.
9. Support the development or adoption of high-quality program standards related to health, mental health, nutrition, physical activity, and physical development.
10. Carry out other activities to improve the quality of child care services supported by outcome measures that improve provider preparedness, child safety, child well-being, or kindergarten entry.

The OCC has developed the QPR to align with the new program requirements made under the CCDBG Act of 2014 and the final rule. The QPR incorporates changes made to reduce the number of questions that ask for similar data collected elsewhere, provide clarification of terminologies used, and provide an option for states and territories to select “Not Applicable” when they do not have available data and explain why. In making the revisions, consideration was given to minimize the burden of the collection of information on respondents. The QPR, submitted on the ACF-118, is required annually.

During the 60-day Public Comment Period (April 11, 2017 – June 11, 2017), OCC received insightful comments on the QPR for States/Territories from 18 entities/organizations. The major themes for the comments were:

- Requests for clarification of terminologies used in the report to improve Lead Agency’s understanding of what is being requested and what is required.
- Requests to revise some questions to include an option for states and territories to select “Not Available” and provide a reason for the unavailability for data.
- Request to eliminate duplicative questions that are asked elsewhere in other child care data reporting.
- Requests to review the burden hour estimate.

OCC made the following general changes/revisions:

- Added more detail to questions and instructions through the document
- Clarified purpose and requirements associated with the QPR
- Clarified that all questions are about spending from October 1 through September 30 of the last federal fiscal year.
- Corrected the burden hour estimate.

In addition to the general changes that were made, the following were specific changes made to the sections in the document:

## **Glossary**

- Added definitions for legally-exempt, licensed, programs, and providers

### **Section 1 - Overview**

- Deleted questions 1.1.2 and 1.1.3, which asked questions about the number of providers that accept or serve children.
- Revised 1.1.1 to no longer ask about child care capacity.
- Removed “school-age” from the responses for 1.1.1.
- Moved the questions that were at 1.2 to Section 4.

### **Section 2 - Supporting the training and professional development of the child care workforce**

- Reordered this section to better align with idea of progression of professional development.
- Reworded 2.4, 2.5, and 2.6 to clarify that the question is asking about providers serving children receiving CCDF.
- Revised 2.7 to clarify that information is from October 1 through September 30 of last federal fiscal year.
- Removed 2.7.4 and 2.7.5.
- Revised 2.7.6 and 2.7.7 to clarify information is from October 1 through September 30 of the last federal fiscal year.
- Revised language at 2.8.1 to clarify that it covers quality expenditures from October 1 through September 30 of the last federal fiscal year and includes expenditures of any available CCDF funds, not just those allocated in the last federal fiscal year.
- Revised language at 2.8.2 to clarify that is covers expenditures from October 1 through September 30 of the last federal fiscal year.
- Removed reference to pre-populated data from 2.9.

### **Section 3 - Improving early learning and development guidelines**

- Revised 3.1 to clarify that Lead Agencies should report on changes or updates made from October 1 through September 30 of the last federal fiscal year.
- Revised language at 3.2.1 to clarify that it covers quality expenditures from October 1 through September 30 of the last federal fiscal year and includes expenditures of any available CCDF funds, not just those allocated in the last federal fiscal year.
- Revised language at 3.2.2 to clarify that is covers expenditures from October 1 through September 30 of the last federal fiscal year.
- Removed reference to pre-populated data from 3.3.

### **Section 4 - QRIS and other transparent system of quality indicators**

- Moved questions 1.2.2, 1.2.3, 1.2.4, 1.2.5, 1.2.6, and 1.2.7 from Section 1.
- Revised 4.1, 4.2, and 4.3 to clarify Lead Agencies should report on supports provided from October 1 through September 30 of the last federal fiscal year.
- Added new question (now 4.1) asking about whether a state has a QRIS and whether it's statewide or a pilot.
- Revised language at 4.5.1 to clarify that it covers quality expenditures from October 1 through September 30 of the last federal fiscal year and includes expenditures of any available CCDF funds, not just those allocated in the last federal fiscal year.
- Revised language at 4.5.2 to clarify that it covers expenditures from October 1 through September 30 of the last federal fiscal year.
- Removed reference to pre-populated data from 4.6.

### **Section 5 - Improving the supply and quality of child care programs for infants and toddlers**

- Revised 5.1, 5.2, 5.3, 5.4, 5.5, and 5.6 to clarify Lead Agencies should report information from between October 1 and September 30 of the last federal fiscal year.
- Removed 5.8.2.
- Revised language at 5.8.1 to clarify that it covers quality expenditures from October 1 through September 30 of the last federal fiscal year and includes expenditures of any available CCDF funds, not just those allocated in the last federal fiscal year.
- Revised language at 5.8.3 to clarify that it covers expenditures from October 1 through September 30 of the last federal fiscal year.

### **Section 6 - Establishing or expanding a statewide system of CCR&R services and other consumer education and engagement**

- Removed 6.1 and related sub-questions (6.1.1-6.1.5)
- Removed 6.2
- Revised 6.2 to clarify that Lead Agencies should report on R&R activities from October 1 through September 30 of the last federal fiscal year.
- Added new question (now 6.2) asking about whether States/Territories use symbols or simple icons to communicate levels of quality for child care programs beyond what may be communicated to parents about licensing standards and compliance.
- Revised language at 6.3.1 to clarify that it covers quality expenditures from October 1 through September 30 of the last federal fiscal year and includes expenditures of any available CCDF funds, not just those allocated in the last federal fiscal year.

- Revised language at 6.3.2 to clarify that it covers expenditures from October 1 through September 30 of the last federal fiscal year.
- Removed reference to pre-populated data from 6.4.

**Section 7 - Compliance with State/Territory requirements for licensing, inspection, monitoring, training, and health and safety**

- Revised 7.1 to ask if a state meets either *Caring for Our Children Basics*, Head Start, or State Pre-K standards.
- Revised 7.2 to remove “Initial training for the 10 health and safety topics defined in the CCDBG Act of 2014” as a response option.
- Removed 7.3.
- Revised 7.4 to clarify that Lead Agencies should report on complaints received from October 1 through September 30 of the last federal fiscal year.
- Revised 7.4.2 to clarify asking about the length of time to initially respond to a complaint.
- Revised 7.5 to say “professionals” instead of “providers”.
- Revised 7.5 to clarify Lead Agencies should report about the number of professionals supported from October 1 through September 30 of the last federal fiscal year.
- Removed “school-age only providers” as an answer option for 7.5.
- Revised language at 7.6 to clarify that it covers quality expenditures from October 1 through September 30 of the last federal fiscal year and includes expenditures of any available CCDF funds, not just those allocated in the last federal fiscal year.
- Added new question (now 7.5.2) to ask about other funds used for quality activities to align with other questions.
- Removed reference to pre-populated data from 7.7.

**Section 8 - Evaluating the quality of child care programs in the state/territory, including evaluating how programs positively impact children**

- Revised 8.1 and 8.2 to clarify that Lead Agencies should report on assessment tools used from October 1 through September 30 of the last federal fiscal year.
- Revised language at 8.3.1 to clarify that it covers quality expenditures from October 1 through September 30 of the last federal fiscal year and includes expenditures of any available CCDF funds, not just those allocated in the last federal fiscal year.
- Revised language at 8.3.2 to clarify that it covers expenditures from October 1 through September 30 of the last federal fiscal year.
- Removed reference to pre-populated data from 8.4.

### **Section 9 - Supporting providers in the voluntary pursuit of accreditation**

- Revised 9.1 to clarify Lead Agencies should report how many providers supported between October 1 and September 30 of the last federal fiscal year.
- Removed 9.2.
- Revised language at 9.3.1 to clarify that the quality expenditures cover the last federal fiscal year activities from October 1 through September 30 and includes expenditures of any available CCDF funds, not just those allocated in the last federal fiscal year.
- Revised language at 9.3.2 to clarify that is covers expenditures from October 1 through September 30 of the last federal fiscal year.
- Removed reference to pre-populated data from 9.4.

### **Section 10 - Supporting the development or adoption of high-quality program standards related to health, mental health, nutrition, physical activity, and physical development**

- Revised 10.1 to clarify that Lead Agencies should report how they met requirements related to developmental screenings from October 1 through September 30 of the last federal fiscal year.
- Added new question (now 10.3) to collect detailed information quality indicators adopted by the state/territory.
- Revised language at 10.3.1 to clarify that it covers quality expenditures from October 1 through September 30 of the last federal fiscal year and includes expenditures of any available CCDF funds, not just those allocated in the last federal fiscal year.
- Revised language at 10.3.2 to clarify that is covers expenditures from October 1 through September 30 of the last federal fiscal year.
- Removed reference to pre-populated data from 10.4.

### **Section 11 - Other activities to improve the quality of child care services as long as outcome measures relating to improved provider preparedness, child safety, child well-being, or kindergarten-entry are possible**

- Added 11.2 to capture information about what percent of CCDF quality funds and non-CCDF funds were spent on this quality activity from October 1 through September 30 of the last federal fiscal year.
- Removed reference to pre-populated data from 11.1

### **Section 12 - Report on policy changes due to death or serious injury of a child**

- Revised to say “submit” not “attach.”
- Made the report Section 12. It did not have a number in the old draft.



- Added clarification about purpose of the report and the requirements associated with it.

**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 60.0 hours per response. This includes the time for reviewing instructions, gathering and maintaining the data needed, reviewing the collection of information, and completing the form. Total cost is projected to be approximately \$134,400 (3,360 hours x \$40 hour).

| Instrument | Number of Respondents | Number of Responses Per Respondent | Hours Per Response | Response Burden |
|------------|-----------------------|------------------------------------|--------------------|-----------------|
| CCDF QPR   | 56                    | 1                                  | 60.0               | 3,360           |

**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 QPR.

**14. Annualized Costs to the Federal Government**

There is no monetary cost to the Federal Government.

**15. Explanations of Program Changes or Adjustments**

This is a new request.

**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 Submission**

There are no exceptions.

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

**The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When item 16 is checked "Yes," the following documentation should be included in the supporting statement to the extent that it applies to the methods proposed:**

Not applicable. The information collected by the QPR is not the type of information that may be collected by statistical methods. Statute requires States and Territories to prepare and submit to the Secretary a CCDF Plan that meets the requirements of Section 658E(c) of the CCDBG Act, 42 U.S.C. 9858c(c).