

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

**From:** Ruth Friedman  
Office of Child Care  
Administration for Children and Families (ACF)

**Date:** July 16, 2021

**Subject:** NonSubstantive Change Request – Child Care and Development Fund (CCDF)  
Annual Aggregate Report (ACF-800) - (OMB #0970-0150)

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This memo requests approval of nonsubstantive changes to the approved information collection, CCDF Annual Aggregate Report (ACF-800) (OMB #0970-0150).

### ***Background***

The ACF-800 collects annual aggregate CCDF data on the children and families receiving direct services under the CCDF from states and territories, as required by the Child Care and Development Block Grant (CCDBG) Act. The form was last renewed in February 2019 and has a current expiration date of February 28, 2022.

In support of the COVID-19 response, Congress has enacted multiple supplemental appropriations for CCDF. The Coronavirus Aid, Relief, and Economic Security (CARES) Act was enacted, which included a \$3.5 billion increase in the CCDF for States, Territories, and Tribes that must be used for activities authorized under the CCDBG Act that prevent, prepare for, and respond to COVID-19. The Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act was enacted, which included a \$10 billion increase in supplemental CCDF Discretionary funds to prevent, prepare for, and respond to coronavirus. The American Rescue Plan (ARP) Act was enacted and included \$14,990,000,000 in CCDF Discretionary Supplemental funds.

The report received an approved nonsubstantive change in June 2020 to adhere to the CARES Act. To collect data on children and families served with the multiple rounds of supplemental funding, the Office of Child Care (OCC) is requesting OMB approval of nonsubstantive changes to the current ACF-800 that are similar to the nonsubstantive changes made in response to the CARES Act.

### ***Overview of Requested Changes***

We propose to ask States and Territories to submit aggregate annual estimates on a few additional key data points—such as number of families and children served whose subsidy was funded with any of the COVID-19 supplemental CCDF funds including CARES Act, CRRSA Act, and ARP Act Discretionary Supplemental dollars. We believe States and Territories will be able to report these figures since they are estimates and aggregate numbers (rather than case-

level data). The changes do not capture information on ARP Act Stabilization Grants, since those funds are not used for subsidies, and will be addressed through other information collections. This nonsubstantive change request includes the modification of the Comments field (element #15) on the CCDF ACF-800 form to ask States and Territories to include:

(a) Specification of the COVID-19 supplemental CCDF funds used for the population of families, children, and providers were reported under questions #1, #2, and #8 of the ACF-800 form (i.e., the extent to which CARES Act, CRRSA Act and/or ARP Act funds services are included). The CARES Act, CRRSA Act and ARP Act Discretionary Supplemental funds are listed and asked separately, but the data questions are the same and include:

- State has included ALL families, children, and providers funded with (listed and asked separately for CCDF CARES Act, CRRSA Act, and ARP Act Discretionary Supplemental) funding in this report.
- State has included a subset of families, children, and providers funded by (listed and asked separately for CCDF CARES Act, CRRSA Act, and ARP Act Discretionary Supplemental) to check all the subsets that apply.
  - those families, children and providers who were funded fully or partially based on children's enrollment rather than attendance
  - children of essential workers (e.g., medical workers, first responders, etc. as defined by the state) and providers who provided child care services to them
  - those families, children and providers where the state paid another provider for the same time of service (double pay of both a closed and open provider). (*This subset will not be asked in the ARP Act Discretionary Supplemental funds data questions, because the ARP Act did not include language allowing this policy.*)
  - some other subset. Describe: \_\_\_\_\_.
- State has NOT included families, children, and providers funded with (listed and asked separately for CCDF CARES Act, CRRSA Act and ARP Act Discretionary Supplemental) funds.

(b) Numerical annual estimates of families, children and providers receiving subsidies for slots only, funded through grants, contracts, or certificates, and specification of COVID-19 supplemental CCDF funds:

- Number of families served whose subsidy was partially or fully funded with COVID-19 supplemental CCDF funds (CARES Act, CRRSA Act, and/or ARP Act Discretionary Supplemental dollars);
- Number of children served whose subsidy was fully or partially funded with COVID-19 supplemental CCDF funds (CARES Act, CRRSA Act, and/or ARP Act Discretionary Supplemental dollars);
- Number of essential worker (e.g., medical workers, first responders, etc. as defined by the state) families served because of the COVID-19 crisis (funded with CCDF CARES Act, CCDF CRRSA Act, CCDF ARP Act Discretionary Supplemental and broader CCDF dollars);
- Number of children of essential workers (e.g., medical workers, first responders, etc. as defined by the state) who received a subsidy because of the COVID-19 crisis (funded with CCDF CARES Act, CCDF CRRSA Act, CCDF ARP Act Discretionary Supplemental, and broader CCDF dollars); and
- Number of providers that received subsidies while the provider was temporarily closed,

based on enrollment rather than attendance of subsidy-eligible children (funded with CCDF CARES Act, CCDF CRRSA Act, CCDF ARP Act Discretionary Supplemental, and broader CCDF dollars).

These revisions reflect some changes to the earlier nonsubstantive changes made in response to the CARES Act. Specifically, we have separated the number of families and the number children into two elements (#15-1 and #15-2). We removed a question (originally element #15-3) around providers serving essential workers, because the information is no longer necessary at this stage of the pandemic. We removed element #16 to alleviate confusion related to the quality activities reported on the Quality Progress Report (ACF-218).

These proposed changes do not impact the estimated average time to complete the ACF-800. We are proposing only changing the wording to ask in a different way for the COVID-19 supplemental funding. The updated form and instructions are included with this request.

***Time Sensitivities***

We would like to provide guidance to States and Territories by the end of July 2021.