

ACF-901 – American Rescue Plan (ARP) Stabilization Grants Provider-Level Data

**OMB Information Collection Request
0970 - NEW**

Supporting Statement Part A - Justification

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

1. Circumstances Making the Collection of Information Necessary

This is a mandatory collection of information that is related to and funded by the Child Care and Development Block Grant (CCDBG) Act (42 U.S.C. 9857 et seq.) and the American Rescue Plan (ARP) Act of 2021 (Sec. 2202, Public Law 117- 2).

Through this information collection, the Office of Child Care (OCC), Administration for Children and Families is obtaining data from Child Care and Development Fund (CCDF) State and Territory Lead Agencies, who are administering the \$24 billion in stabilization funding, with their efforts to award ARP stabilization grants to child care providers in their state/territory. This information will be included in any Reports to Congress, and other reports as appropriate.

2. Purpose and Use of the Information Collection

The OCC established a new data collection form, the ACF-901 – American Rescue Plan (ARP) Stabilization Grants Provider-Level Data to collect information about the numbers and characteristics of child care providers receiving stabilization grant awards, including whether funds have been distributed equitably and are reaching historically underserved communities. All Lead Agencies in the States, the District of Columbia, and Territories (Puerto Rico, American Samoa, Guam, Northern Mariana Islands, and the U.S. Virgin Islands) are responsible for collecting and reporting provider-level stabilization grants data using the ACF-901 form.

Lead Agencies will report the ACF-901 data quarterly, due 30 days after the end each quarter (i.e., October to December data will be due January 30).

OCC plans to use the data to report on the results of ARP stabilization grant awards and to provide data to Congress to answer questions such as:

- How many providers by type received at least one stabilization grant by State?
- How many stabilization grants were awarded and what was the average grant amount by State?
- What were the most frequent intended use of the stabilization grants by State?

3. Use of Improved Information Technology and Burden Reduction

States, the District of Columbia, and Territories will submit their provider-level records electronically to the Child Care Automated Reporting System (CARS), which is a new system currently being rolled out. CARS is a web-based, password-protected application that checks for data compliance with data standards at the time of submission. These built-in, edit-checking features make it easier to identify and correct errors. Use of the paperless Internet data entry site streamlines submission processing and improves data quality. OCC

plans to provide additional technical format guidance to states and territories in the form of a Technical Bulletin, which will describe the format of each data element (such as, guidance on the format of a date field, or the length of a numeric field).

4. Efforts to Identify Duplication and Use of Similar Information

This is a new information collection. Similar questions are being asked on ACF-218: Quality Progress Report (QPR), which added aggregate reporting activities related to ARP stabilization grants. The ACF-901 was developed in conjunction with the ACF-218 to avoid duplication of effort and will be used as complementary data sources.

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 data will be collected quarterly, instead of monthly. This reduces the burden on states to extract provider data monthly, and it allows states more time to process provider applications and disperse funds.

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 July 22, 2021, Volume 86, page 38722, and provided a sixty-day period for public comment. During the notice and comment period, three (3) comments were received, which are attached. Based on the comments we received, OCC will provide technical assistance (TA) needs to lead agencies to better understand the reporting requirements, and OCC made small clarifications to the ACF-901 instructions. OCC made clarifying changes to the instructions for "award amount" and "award date" to include the amount that should be reported is the grant amount that was dispersed to the provider on the award date, and not the grant amount at the time the grant is approved. OCC also made a clarifying change in the instructions regarding the total number of providers that received grants (funds were dispersed by the

state/territory) during the quarter and that it is NOT the number of providers that were approved for an award during the quarter but did not receive moneys dispersed by the state/territory during the quarter. Other small technical changes include removing a technical guidance reference as we plan to provide technical guidance separately, adding “county” to FIPS code for clarity, and describing the date format (YYYYMMDD) in the instructions.

The first set of comments were regarding reporting provider characteristics, including unique ID/FEIN for purposes of reporting, and award amount and award date. OCC will provide TA educating on and encouraging the unique ID approach. OCC has given guidance on the award amount and the award date. OCC will also reach out with TA regarding non-allowable uses when implementing ARP stabilization grants.

The second set of comments were regarding the reporting deadline; information collected, including provider characteristics and award amount and timing; and aligning the ACF-901 data elements with those in the sample applications. OCC will provide TA to the lead agency to better understand these reporting requirements. OCC considered the request to extend the submission deadline, but determined to not implement such a change for the following reasons:

- the type of data to be reported (grant awards) could be made available soon after the end of the quarter, similarly to the requirement for CCDF quarterly financial reports
- the grant data requested from states will help answer questions on the impact of the ARP Act Stabilization funding to the child care market. Any delays in receiving the data would impact our ability to assess the infusion of funding in local communities and report to Congress timely.

As previously mentioned, we provided clarifying changes to the instructions for “award amount” and “award date”. In terms of aligning data elements with sample applications, OCC will reach out and provide TA, since the comments are based on the state not reading the information correctly.

The third set of comments were around the data elements for “total capacity” and identified capacity data for license-exempt providers; response options; and allowing additional information by adding footnotes. OCC will provide TA around data elements. OCC will provide TA on leaving an answer blank versus adding “Unknown” on reporting temporary closures. Finally, OCC will be drafting technical guidance to states for formatting the data submission files and we will include guidance around footnotes, which is part of reporting and is not a reference in the data collection tool.

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-901 form 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	Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
ACF-901 – American Rescue Plan (ARP) Stabilization Grants Provider-Level Data	56	4	20	4,480	\$36.76	\$164,685
Estimated Annual Burden Total:				4,480	Estimated Annual Cost Total:	\$164,685

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2020, which is \$18.38 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$36.76. The estimated annual labor cost for all States and Territories (56) is \$164,685. https://www.bls.gov/oes/current/oes_stru.htm

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

Operational costs for systems software computer time will average about \$4,500 a year per State and Territory, for a total of \$252,000 for all States and Territories (56). The estimated total annual cost, including burden hours, for all States and Territories (56) is \$416,685 (i.e., \$164,685 plus \$252,000).

14. Annualized Cost to the Federal Government

ACF accepts ACF-901 reports via a secure web submission site. The estimated annual Federal cost is \$568,000. This includes systems costs, including data base maintenance associated with the electronic system, provision of technical assistance/training to lead

agencies for submitting the ACF-901 report, and data analysis efforts.

15. Explanation for Program Changes or Adjustments

This is a new information data collection.

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, and other reports as appropriate, such as for the Department or the White House. This is an unprecedented investment with stabilization grants, so potential public facing information may include:

- How many providers by type received at least one stabilization grant by State?
- How many stabilization grants were awarded and what was the average grant amount by State?
- What were the most frequent intended use of the stabilization grants by State?

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.