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

From: Richard Gonzales, Federal Project Officer
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Administration for Children and Families (ACF)

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Subject: NonSubstantive Change Request – Generic Information Collection under Generic Performance Progress Report (OMB #0970-0490): Preschool Development Grant Birth through Five (PDG B-5) Renewal Grant Performance Progress Report

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This memo requests approval of nonsubstantive changes to the approved generic information collection (GenIC), Preschool Development Grant Birth through Five (PDG B-5) Renewal Grant Performance Progress Report (PPR). This GenIC is approved under the Generic Performance Progress Report (OMB #0970-0490).

Time Sensitivities:

Because the PDG B-5 grantees are expected to complete their responses to these questions within the first 3 months of 2022, reflecting their progress in 2021, a quick approval would be most beneficial.

Background:

In November 2019 OMB approved a generic information collection request for an Annual Performance Progress Report (APPR) for the Administration for Children and Families (ACF) Office of Child Care's (OCC) *Preschool Development Grant Birth through Five (PDG B-5) Renewal Grant* awardees. This information collection was extended under the umbrella Generic PPR extension in January 2020 and the current expiration date is January 31, 2023.

The PDG B-5 Renewal Grant Performance Progress Report template/tool was an Excel Spreadsheet, which was accompanied by an instruction package. Data collection took place in the first quarter of 2021 and, after submission of the state reports, an extensive analysis was done by our PDG B-5 Technical Assistance (TA) Provider and the Federal Project Officers. This analysis resulted in the recognition that, despite the instruction guide and related support webinars on how to complete the report, large portions of the information provided were questionable, did not reflect what OCC desired to receive, or simply did not sufficiently describe the progress made or accurately tell each state's story.

As a result of our analysis, OCC formed a PDG B-5 Grantee APPR work group, composed of state representatives and facilitated by our TA provider staff, to further analyze the effectiveness and usefulness of the APPR and to make recommendations that would clarify instructions, reduce burden, and allow each state to tell its story in ways that were most suited to each state's

approach to data, while still providing us at the federal level with necessary and useable information.

Grantee feedback received from multiple APPR work group sessions was nearly unanimous in its criticism of the report template. States reported extreme difficulty in collecting the requested information, creating a much greater burden of time and effort than originally projected, resulting in an inability on the part of the state to vouch for the accuracy of the data submitted. An attachment (APPR Workgroup Comments-Recommendations) summarizes some of the PDG B-5 Grantee Workgroup feedback received that led to this request for approval of a revised tool and approach.

Overview of Requested Change:

The proposed new approach would replace the previously approved Excel spreadsheet with nine (9) comprehensive questions to be answered in a narrative format. For each of the questions, states will be required to provide existing supporting data from their comprehensive, statewide, B-5 needs assessment, their related strategic plan, their program performance evaluation plan (PPEP), and/or, as applicable, their early childhood integrated data system (to the degree such a data system has been developed). The data can be submitted in any format that works for the state – embedded in the narrative document, or as appendices. Such an approach will allow the state to tell its story based on the unique and specific data collection, management, and use capabilities of each state.

We created the nine (9) core questions by consolidating the up to 23 narrative questions and the many different data list items identified in the original excel tool. We have not added any new elements, but we have increased the estimated time to complete the request based on the feedback received. Two attached documents provide:

- the nine (9) proposed 2021 Annual Performance Progress Report (APPR) Questions with a brief guiding introduction
- a crosswalk of the nine (9) proposed 2021 APPR questions with the questions and other elements in the existing OMB approved APPR Excel template and instructions.

To make certain that our proposed approach was responsive to the feedback received and would result in the desired outcome of obtaining more meaningful and useful data, we presented this proposed tool to all the grantees, sharing during our webinar how the tool for which we are now seeking OMB approval came to be and how it reflects the many different recommendations from the states themselves.

The proposed tool with its nine (9) comprehensive questions was received very well by the PDG B-5 Renewal grantees. Comments include:

- “The narrative approach allows us to report on the true efforts that are happening in a qualitative way that cannot be recognized just through data.”
- “The narrative is a much nicer way to be able to share our PDG B-5 story and also provide the necessary data.”
- “APPR revisions will nicely align with being able to more easily and meaningfully engage stakeholders through the EC advisory council.”

- "With large data collections like this, it is helpful to be able to be able to say that the data we are sharing is reflective of data systems and tools we are using in our state."
- "The new approach aligns better with our work than the previous APPR because it focuses on our system building efforts, not on the data collection. The previous APPR made our partners focus on what they didn't have instead of what we were doing better."
- "These new questions align better with existing data collection. Many members of the team felt they couldn't properly answer what was being requested previously."
- "This greater narrative process of more narrative allows for more depth and greater flexibility to highlight successes."
- "This new process will allow our partners to feel more confident in the data they are collecting and sharing, because they can discuss the limitations."
- "I feel like the APPR from last year was flat; it was not dynamic. It was a good blueprint, but this proposed new process with more narrative allows you to present progress over time."
- "Many of the newly proposed APPR questions align closely with our Program Performance Evaluation Plan (PPEP), so it will be easier to build into our PPE Evaluation Reporting. Also, the new format will make it easier to summarize and distribute the information to stakeholders and partners."

Finally, the purpose of this revised APPR has not changed. The purpose remains to help OCC assess the progress of the PDG B-5 renewal grantees, as they work to improve coordination of their existing early childhood programs and services and funding streams in a mixed delivery model. This PPR remains tailored to the specific goals and objectives of the PDG B-5 Renewal Grants and will still allow ACF to collect useful data from grantees in a uniform and systematic manner. ACF intends to analyze gathered data to provide a descriptive snapshot of grantees and assess progress over time. This PPR will be collected annually and supplement the information provided through the standard ACF PPR (OMB #0970-0406), which will be collected with more frequency (quarterly).