

Child Care and Development Fund (CCDF) Quality Progress Report (QPR) ACF-218

**OMB Information Collection Request
0970-0517**

Supporting Statement Part A - Justification

October 2021; updated July 2022

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

The Office of Child Care (OCC), Administration for Children and Families, requires Child Care and Development Fund (CCDF) state and territory Lead Agencies (LAs) to report annual aggregate data on quality activities on the ACF-218 report form. This report is required by 45 CFR 98.53(f) of the CCDF Final Rule. This information will be included in the biennial CCDF Report to Congress, as appropriate, and will be shared with LAs to inform them of CCDF or Child Care and Development Block Grant-funded (CCDBG) activities in other programs.

2. Purpose and Use of the Information Collection

The ACF-218 collects information from states and territories to describe investments to improve the quality of care available for children from birth to age 13. This report meets the requirements in the CCDBG Act of 2014 and the CCDF Final Rule (45 CFR 98.53(f)) for states and territories to submit an annual report that describes how 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. The FFY 2021 ACF-218 is one of the primary data sources the OCC will use to demonstrate how states and territories are using the supplemental funding that has been awarded over the past year (i.e., CARES, CRRSA, ARPA). This revision request includes a new section specific to ARP Child Care Stabilization Grants. The data describe how CCDF quality funds were used including estimates of children served and providers participating in quality activities. Tribes including CCDF-funded grantees that receive funding under Pub. L. 102-477 are not required to submit the ACF-218. OCC uses the information from the ACF-218 – including the newly added information – in the following ways:

- (a) Ensure accountability and transparency for the use of CCDF quality funds, including a set-aside for quality infant and toddler care and the new stabilization grants funded by the American Rescue Plan (ARP) Act funding;
- (b) Track progress toward meeting state- and territory-set indicators and benchmarks for improvement of child care quality based on goals and activities described in CCDF Plans; and
- (c) Understand efforts in progress towards all child care settings meeting the developmental needs of children
- (d) Inform federal technical assistance efforts and decisions regarding strategic use of quality funds.

3. Use of Improved Information Technology and Burden Reduction

Since 2012, LAs have submitted their ACF-218 data through an internet-based submission website. System edit checks provide immediate feedback concerning the accuracy of the submitted data. The electronic system performs audit checks and provides feedback to LAs. Information and on-line technical assistance support related to the ACF-218 form is also available at <https://www.acf.hhs.gov/occ/report/acf-218-annual-quality-progress-report-qpr>. This guide is updated annually and is shared with LAs and training is conducted to help them complete the ACF-218 form.

4. Efforts to Identify Duplication and Use of Similar Information

Each year and plan cycle the OCC evaluates the ACF-218 for any unnecessary duplication of information collected within and across data sources. As a result, several items were removed from the updated ACF-218 to reduce burden. Additionally, the ACF-218 was developed in conjunction with the ACF-901 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 information is collected annually as required by 45 CFR 98.53(f) of the CCDF Final Rule. The data is submitted annually on the last day of the calendar year (December 31), and covers the most recent Federal fiscal year (October through September).

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, Number 138, pages 38723-38724, and provided a sixty-day period for public comment. During the notice and comment period, one (1) comment was received, which is attached.

The comment was received from a state regarding a question that has since been removed, a question that has since been clarified, and the state's data capabilities. This comment highlights the technical assistance (TA) needs of LAs regarding data capabilities.

The OCC provides extensive TA to LAs for questions related to their reporting requirements. The National Center on Child Care Data and Reporting, contractor to the OCC, conducts training sessions and delivers individualized TA to state and territory grantees across the country.

With the roll-out of reporting change(s), OCC conducts national and regional training, with the help of its contractor, to review the changes to the reporting requirements, address questions such as the comments we received, and ensure grantees know where to find resources available to

them with detailed guidance, such as Technical Bulletins and the Program Instruction. These materials will be updated again to reflect reporting requirement changes.

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-218 form contains aggregate data and 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	Annual Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
CCDF Annual QPR ACF-218	56 (Tribes with small allocation)	1	65	3,640	\$36.76	\$133,806

The cost to respondents was calculated based on 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 the fringe benefits and overhead, the rate was multiplied by two which is \$36.76. The estimate of annualized cost to respondents for hour burden is \$36.76 times 4,200 hours or \$154,392.

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

Operational costs for computer equipment will average about \$1,000 a year per LA (respondent), i.e., \$56,000 per year.

14. Annualized Cost to the Federal Government

The estimated annual Federal cost is \$744,000. This includes systems costs, including data base maintenance associated with the electronic system, and provision of technical assistance/training to LAs for submitting the ACF-218 report. Program analysts review information submitted to

ensure consistency and contact grantees as necessary when information is incomplete or questionable.

15. Explanation for Program Changes or Adjustments

In 2021, to reflect changes related to additional funding streams, OCC made changes to the ACF-218 (including removing unnecessary items) instead of developing a separate data collection (in addition to the new ACF-901) in an effort to reduce the cumulative total reporting burden to grantees across data collection instruments. Examples of these changes include removing some questions from Section 7 and adding a new section about ARP Child Care Stabilization Grants. This change request includes additional burden reduction due to the removal of ten questions from Section 13, roughly two-thirds of the section. Prior to the addition of Section 13, the QPR had a burden estimate of 60 hours. The full Section 13 was estimated to take about 15 hours and the burden at that time was increased to 75 hours. With the removal of the ten questions, we have revised the burden estimate to 65 hours (a 10-hour reduction).

16. Plans for Tabulation and Publication and Project Time Schedule

The results of this information collection included in the annual CCDF Report to Congress and other reports, as appropriate.

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.