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Subject: NonSubstantive Change Request – Child Care and Development Fund (CCDF)
            Quality Progress Report (QPR) – (OMB #0970-0517)

This memo requests approval of nonsubstantive changes to the approved information collection, Child Care and Development Fund (CCDF) Quality Progress Report (QPR) – (OMB #0970-0517).

Background

The QPR 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 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, including the activities funded and the measures used to evaluate progress in improving the quality of child care programs and services. The report was last renewed in December 2021 and has a current expiration date of December 31, 2024.

The Office of Child Care (OCC) proposes minor changes to the OMB approved form to simplify the appearance of the form to align with OCC's new data collection system, the Child Care Automated Reporting System (CARS); clarify existing questions; make a small number of existing questions more specific to capture known common areas of quality expenditure across states and territories; and eliminate duplication of effort with other OCC data collections.

Overview of Requested Changes

Alignment with CARS

The federal fiscal year (FFY) 2022 QPR was the first year to utilize CARS. Based on initial experiences, OCC proposes the following changes to restructure repetitive questions to make the FFY 2023 QPR have a more streamlined appearance and user experience.

- The first such restructuring is to the spending questions which used to appear at the end of every section. For the FFY 2023 updated QPR nonsubstantive change, if the Lead Agency indicates that they have engaged in a particular activity, the spending question will appear for them to answer on that same page. This makes it simpler for Lead Agencies to submit cleaner data as they do not have to remember across questions and do not have to submit lengthy descriptive responses.
- The next restructuring is to several items in Section 4 related to Lead Agency quality rating and improvement systems (QRIS). With new abilities in CARS, we are able to

combine across multiple items in Section 4 (4.1, 4.5, and 4.6) so that Lead Agencies are able to report all information about their high quality levels in the same item. Similarly, items 4.7, 4.8, 4.9, and 4.10 were combined into one item as CARS allows for similarly formatted questions to easily appear in the same item.

- A final restructuring is to the progress update question for each allowable quality activity section (10 sections, 10 items total) on the QPR. CARS functionality allows OCC to pull in lead agency responses to the corresponding FFY 2022-2024 Child Care and Development Fund Plan (ACF-118; OMB #0970-0114) to make it easier for lead agencies to respond to these items and provide cleaner data.

Edits for Clarification and Streamlining

Next, to capture common areas of quality expenditure among states and territories, one question was added to the form to capture information useful to OCC related to quality expenditures. Lead agency policy information is captured in the CCDF Plan (ACF-118; OMB #0970-0114), but numerical data is not. The two questions added to this form are:

- Question on the number of licensing staff positions (New 7.2). Ratios for licensing staff are captured in the CCDF Plan (ACF-118; OMB #0970-0114) and obtaining actual staff numbers would allow OCC to understand what these ratios mean.
- Question on compensation and benefits improvements not tied to credential attainment (New 11.5). This question was previously embedded in question 2.2.2 and Question 11.7 on general supports for providers.

Additionally, multiple existing questions were revised for clarity. The information requested and intent of these questions did not change from the previous form. In some cases, questions were streamlined to correct systemic data collection issues or expanded to cover known areas of state/territory quality spending, such as:

- Streamlined questions on workforce compensation and benefits (2.2.2 and 11.7) as these questions were asking slightly nuanced versions of the same thing which confused lead agencies. They were also unable to disaggregate the total by provider type.
- Streamlined questions on licensed provider credentials (2.3 and 2.4) because lead agencies are unable to disaggregate the total by provider type.
- Streamlined question on technical assistance available to providers (2.5) because lead agencies are unable to provide a reliable number (e.g., they don't track these data) or disaggregate the total by provider type.
- Expanded question on infant/toddler health specialists to include common infant/toddler supports and services (5.1.2).
- Streamlined question on parental complaints (7.2.2-7.2.7) because this level of detail is not required and data quality is an issue.
- Streamlined questions on measurement tools to assess quality (8.1 and 8.2) to include checklist instead of description because these are the most common measures reported by lead agencies year after year (lead agencies still have the option to describe other measures should they need to).
- Expanded options for question on high-quality program standards (10.1) to include additional ways lead agencies help providers adopt high-quality program standards.

Finally, to account for additional or expanded questions we removed 14 pre-existing questions

that either do not demonstrate change from year to year (i.e., we get this information from the CCDF Plan) or consistently produce non-meaningful/unreliable data (i.e., lead agencies either do not reliable collect these data and do not plan to). The questions that were removed from the FFY 2022 QPR are:

- Question 3.1 on changes to the lead agency's early learning and development guidelines – once these guidelines are enacted they rarely change.
- Question 4.3 on numbers of providers eligible for QRIS – lead agencies are unable to disaggregate by provider type and typically do not have any information beyond what they already report in 1.1.
- Question 4.4 on types of providers mandated to participate in QRIS – this policy does not change from year to year.
- Questions 4.7, 4.8, and 4.9 on number of providers receiving financial incentives – lead agencies are unable to report on license-exempt providers, in-home providers.
- Question 4.10 on number of providers receiving QRIS technical assistance – lead agencies are unable to provide a reliable number (e.g., they don't track these data) or disaggregate by provider type.
- Question 5.2 on numbers of programs receiving infant/toddler coaching funded by CCDF already captured in the spending question for 5.1.
- Question 5.3 on how lead agencies support infant/toddler programs already captured in the expanded question for 5.1.2.
- Question 6.1 on updates to the lead agency's CCR&Rs – these policies rarely change.
- Question 7.1 on CCDF standards alignment with other systems – these policies rarely change.
- Question 11.2 on specific COVID-19 supports (e.g., vaccinations) no longer relevant
- Question 11.5 on DEI practices as lead agencies were unable to report on these activities reliably
- Question 13.3 on approaches to eliminate fraud for American Rescue Plan (ARP) Stabilization Grants – these approaches do not change from year to year and these grants are ending.

Addressing Duplication of Efforts

Similarly, to account for duplication across OCC data collection instruments we removed parts of several pre-existing questions. The questions removed from the FFY 2022 QPR:

Question Removed	Report where data can be found	Justification
1.1 license exempt center-based programs	ACF-800 (OMB #0970-0150)	Lead agencies only report on their CCDF license exempt center-based programs because these are the only data they have
1.1 license exempt family child care homes (care in providers' home)	ACF-800 (OMB #0970-0150)	Lead agencies only report on their CCDF license exempt family child care homes

		because these are the only data they have
1.1 in-home (care in the child's own home)	ACF-800 (OMB #0970-0150)	Lead agencies only report on their CCDF in-home care because these are the only data they have
1.2 changes to lead agency goals	ACF-118 (OMB #0970-0114)	Lead agencies submit plan amendments for policy changes so these are already reported elsewhere
4.7 providers serving children who receive CCDF subsidy	ACF-800 (OMB #0970-0150)	This information is already reported elsewhere
4.8 providers serving children who receive CCDF subsidy	ACF-800 (OMB #0970-0150)	This information is already reported elsewhere
4.9 providers serving children who receive CCDF subsidy	ACF-800 (OMB #0970-0150)	This information is already reported elsewhere

OCC anticipates these streamlining efforts will reduce the average time per response but wants to monitor estimated response time once implemented to ensure burden estimates are accurate.

Time Sensitivities
A minimum of two months is needed to create the form module in the online system, CARS. We would like to have the system go live on October 1, 2023 to give states and territories sufficient time to meet the submission deadline of December 31, 2022. To meet these deadlines, we request a response on these proposed changes prior to August 1, 2022.