

Justification for Non-Material Change to OMB 1290-0025

This memo requests a non-material change to the Paperwork Reduction Act (PRA) package previously approved by the Office of Management and Budget (OMB Control No. 1290-0025) for data collection for the **National Database of Childcare Prices**. These changes are requested in an effort to further clarify the data request for respondents.

Background

Since 2022, the U.S. Department of Labor (DOL) Women's Bureau has hosted the National Database of Childcare Prices (NDCP). The NDCP is the most comprehensive federal source of childcare prices at the county level and it currently provides data for the years 2008 through 2018. The NDCP is based on data collected by each state in their childcare market rate surveys (MRS). State-administered MRS are conducted by state human services or workforce development offices (i.e., Lead Agencies) according to federal regulations to receive Child Care and Development Block Grants (CCDBG). MRS provide market prices of various types of child care (e.g., center-based, home-based) by age of children (e.g., infants, toddlers, preschoolers, school-age children) and by geography. MRS are used to establish reimbursement rates for childcare subsidies. MRS sample eligible centers and care providers in the priced market and obtain the full market price of care. MRS data are a rich source of local childcare price data. However, these data are not reported to the federal government and they are retained by the states. As a result, reporting metrics are not standardized across states and some of the data is not accessible to the public.

MRS are currently collected in three-year cycles. The most current MRS data collection cycle reflects the years 2019 through 2021. Some states may have applied for waivers and conducted data collection or reporting activities in 2022 due to disruptions caused by the COVID-19 pandemic. This information collection would request MRS data for surveys conducted between 2019 and 2022 from all states and the District of Columbia.

On January 2, 2024, OMB approved the new information collection request (ICR) for state MRS.

Change Requests

DOL requests minor changes to the contact materials for states, to accommodate to improve clarity on the type of data collected. This non-substantive change requests the following:

- Removing "including reports that use cost-based alternative methodologies" language from contact materials.
 - During the period of requested data (2019-2022), only 3 states used an Administration for Children and Families (ACF) pre-approved, cost-based alternative methodology: DC, NM, and VA. However, this letter is being sent at a time when additional states are currently collecting data for an ACF pre-approved, cost-based alternative methodology. These states may be confused as to what is being requested of them as they are in a period of transition, potentially resulting in more missing data and follow-up questions. If they do not respond or have questions about what data to submit, the question and response in Contact 4A and Contact 4B remains to provide that clarification. This will not

change the data being requested or received and will eliminate a potential source of confusion.

- o The instructions provided in the request on how to submit data (found in the following materials: Contact 2, Contact 3, Contact 5, and Attachment 2), only pertain to how to submit MRS data – DC, NM, and VA would still not be able to submit their cost-based data - cost-estimation model data (the data that these 3 states used) are in a very different format, will likely not be county based, and will not contain prices at all. If they do not respond or have questions about what data to submit, the question and response in Contact 4A and Contact 4B remains to provide that clarification.
- Adding “ACF pre-approved” to the response in Contact 4A and 4B
 - o This will further help states make the connection that the data request is related to the data they already collect.

The contact materials have been updated and provided in this package.

These requested non-substantive changes do not require any changes to the burden estimates.