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

From: Meryl Barofsky
Office of Child Care
Administration for Children and Families (ACF)

Date: May 24, 2024

Subject: NonSubstantive Change Request – Child Care and Development Fund for Tribes for FFY 2023-2025 (OMB #0970-0198)

This memo requests approval of nonsubstantive changes to the approved information collection, Child Care and Development Fund for Tribes for FFY 2023-2025 (OMB #0970-0198).

Background

In April 2022 OMB approved a revision request for this information collection and extended approval for three years. Subsequently, two nonsubstantive change requests were approved; one in October 2022 and one in February 2023. The report is submitted once every three years and Tribal Lead Agencies submitted their most recent responses for the requested information in late winter 2023.

OCC has a trust responsibility to consult with Tribal Nations and incorporate their testimony to the maximum extent feasible. To meet this responsibility and in support of Executive Order 14112, OCC released a Request for Information (RFI) titled: Meeting the Child Care Needs in Tribal Nations in the summer of 2023. This RFI covered rules and regulations of the Tribally administered Child Care and Development Fund (CCDF) program as part of ACF's commitment to creating partnerships with Tribal Nations to identify and implement solutions that transcend traditional program boundaries. OCC hosted over 14 in person and virtual listening sessions and two in person Tribal Consultations focused on the RFI.

One thing OCC heard consistently is that the Tribal Lead Agencies (TLAs) need more lead time (at least one year) to complete one piece of this information collection: **the *Triennial Child Count***. The Triennial Child Count allows OCC to calculate the funding for tribal grantees using these responses. As such, OCC is hoping to inform Tribal Nations and TLAs as soon as possible and update systems concurrently to allow for work on this piece of the information collection and provide sufficient technical assistance. The next due date for the CCDF Plan for Tribes is not due until July 1, 2025 and the child count would not actually be due until that time, but being able to put the request out for just that information would be helpful so work can begin on that piece (ACF system updates to the CARS system, TLAs beginning data entry, etc). To allow for this, OCC is requesting a non-substantive change to open this section of the information collection in July 2024, to allow Tribal grantees to answer the same questions one more time. OCC proposes minor changes to the questions to reduce the administrative burden on respondents.

Overview of Requested Changes

OCC would like to open up the *Triennial Child Count* questions for the 264 CCDF Tribal grantees to submit the same questions starting in July 2024.

- Create a stand alone section for the Triennial Child Count (Section 1)
- OCC reduced previous duplication in entering question text and uploading a PDF with the same information for non-consortia grantees. OCC request to reduce the administrative burden in only requiring respondents to enter the information and not requiring a PDF upload.
- OCC reduced administrative burden to consortia grantees in uploading two PDFs per member Tribe. OCC requests to reduce this burden by requiring only one PDF upload.

We have included an updated version of the CCDF Plan for Tribes as well as an updated SSA to describe the new opportunity and to account for burden that may occur between now and the next extension request (prior to April 30, 2025).

Time Sensitivities

Tribal CCDF Lead Agencies need to submit their responses by July 1, 2025. However, they need a full year to complete the tasks associated with conducting a child count. Therefore, OCC requests approval by July 1, 2024.