

**Office of Child Care Technical Assistance  
Interest Form: Improving Child Care and Part C  
Integration or Disability Inclusion in Child Care**

**Formative Data Collections for Program Support**

**0970 – 0531**

**Supporting Statement  
Part A - Justification**

**August 2024**

Submitted By:  
Office of Child Care  
Administration for Children and Families  
U.S. Department of Health and Human Services

4<sup>th</sup> Floor, Mary E. Switzer Building  
330 C Street, SW  
Washington, D.C. 20201

## **A1. Necessity for the Data Collection**

The Administration for Children and Families (ACF) Office of Child Care (OCC) at the U.S. Department of Health and Human Services (HHS) seeks approval for collecting information from States and Territories that are interested in applying for the opportunity to receive Technical Assistance (TA) for either (1) the purpose of integrating Early Intervention services and supports in child care settings for infants and toddlers with developmental delays and disabilities, and infants and toddlers who are at risk of developing delays or (2) for the purpose of strengthening child care programs' inclusion of children with disabilities by leveraging the Child Care Development Fund (CCDF).

### **Background**

#### Technical Assistance for Integrating Early Intervention Services and Supports in Child Care Settings

OCC is committed to better integrate Early Intervention services and supports in child care for infants and toddlers with developmental delays and disabilities, and infants and toddlers who are at risk of developing delays. OCC is partnering with Guidehouse and ZERO TO THREE (Project team) on the "Supporting States and Territories to Improve Integration of Child Care and Part C EI Services" project. The project team's partnership with State/Territory CCDF lead agencies will support the enhancement of the integration of Early Intervention services and support in child care settings (both home and center-based) by providing versatile tailored TA to identify and design strategies and a plan of action for policy and systems change. Examples the project is focusing on include policy, practice and system improvements that lead to:

- Increased services and supports in child care for infants and toddlers with developmental delays and disabilities, and infants and toddlers who are at risk of developing delays, (based on the state's Part C EI definition for at-risk);
- Improved coordination and integration of services aligned to the developmental needs of the child;
- Improved service delivery of Individualized Family Service Plans (IFSPs) in coordination with child care; and
- Children with developmental delays or disabilities, or at risk of developing delays, have access to high quality child care that meets their needs.

#### Technical Assistance for Strengthening Child Care Programs' Inclusion of Children with Disabilities

Additionally, OCC is committed to making high-quality child care available to all children and families. Accessing high-quality, affordable child care is a challenge for many families, but families with children with disabilities and developmental delays find it particularly difficult to find inclusive care that meets their needs. To this end, the "Disability Inclusion in Child Care" project will focus on centering equity and finding practical solutions that leverage the CCDF to strengthen inclusion in child care. OCC is partnering with Guidehouse, Start Early, and the University of North Carolina Frank Porter Graham Child Development Institute on this project to

design and implement innovative approaches to TA focused on strengthening child care programs to be more inclusive.

Both technical assistance projects will aim to recruit and partner with at least five State/Territory CCDF lead agencies, each (10 total). **As this a new type of effort for OCC and the CCDF lead agencies, OCC proposes to provide agencies with the opportunity to express interest and provide information that will allow OCC to understand if they have the capacity and what questions they may have or supports they may need if they were to apply for the projects.**

### ***Legal or Administrative Requirements that Necessitate the Collection***

There are no legal or administrative requirements that necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

## **A2. Purpose of Survey and Data Collection Procedures**

### ***Overview of Purpose and Use***

Information requested and collected through this process will be used solely for the purposes of determining interest in and present capacity to engage with OCC in intensive TA opportunities. Information gathered during this process will not be used outside of the scope of these specified TA opportunities.

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531):

- Planning for provision of programmatic T/TA.
- Delivery of T/TA related to program implementation or the development or refinement of program and grantee processes.

### ***Processes for Information Collection***

State and territory CCDF lead agencies will receive information about both projects and have an opportunity to complete brief interest forms (one per project; see attachments). The information collected will be used by the project team to inform the selection of state/territory CCDF lead agencies for each project to have individualized follow up discussions about participating in the TA projects. The goal is to identify a total of 10 lead agencies with the interest in and capacity to participate in the two TA projects.

The project team will release the Interest Forms to all state and territory CCDF lead agencies. Interested state/territory CCDF lead agencies will submit their answers to the brief interest forms via electronic form.

## **A3. Improved Information Technology to Reduce Burden**

The Project Interest Forms will be completed and submitted electronically.

#### **A4. Efforts to Identify Duplication**

No other data collection exists that provides the specific information about TA readiness and capacity needed for the project teams to inform these efforts.

#### **A5. Involvement of Small Organizations**

The potential applicants are State and Territory CCDF lead agencies.

#### **A6. Consequences of Less Frequent Data Collection**

This is a one-time data collection.

#### **A7. Special Circumstances**

There are no special circumstances for the proposed data collection efforts.

#### **A8. Federal Register Notice and Consultation**

##### ***Federal Register Notice and Comments***

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 request to extend approval of the umbrella generic with minor changes. The notice was published on January 28, 2022, (87 FR 4603), and provided a sixty-day period for public comment. ACF did not receive any comments on the first notice. A second notice was published, allowing a thirty-day period for public comment, in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice.

##### ***Consultation with Outside Experts***

No consultations have taken place with experts outside of the project team. The project teams include Federal staff, and federal contractors from Guidehouse, and subcontractors from the University of North Carolina's Frank Porter Graham Child Development Institute, Start Early, and ZERO TO THREE.

#### **A9. Tokens of Appreciation for Respondents**

No tokens of appreciation for respondents are proposed for this information collection.

### **A10. Privacy of Respondents**

Personally Identifiable Information (PII), including contact information will be requested only for follow-up purposes. Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private.

### **A11. Sensitive Questions**

There are no sensitive questions in this data collection.

### **A12. Estimation of Information Collection Burden**

#### ***Burden Estimates***

There are 56 CCDF lead agencies and we will send the forms to all agencies; we anticipate fewer than half of the 56 CCDF lead agencies will respond and an even smaller proportion will complete both forms but it is expected these numbers will still exceed 10. Since this is a new effort, however, we have estimated burden for 28 potential respondents for each form, to ensure we do not exceed our approved numbers.

It is estimated that it will take CCDF lead agencies approximately 30 minutes to complete an interest form (for a total of 60 minutes across both forms), depending on related existing efforts and relationships within the States/Territories.

#### ***Cost Estimates***

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for [Education and Childcare Administrators, Preschool and Daycare \[11-9031\]](#) and wage data from May 2023, which is \$29.48 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$58.96.

Source: [https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm)

Instrument	Total Number of Potential Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Annual Cost
Interest Form: Integration of Child Care and Part C	28	1	.5	14	\$58.96	\$825.44
Interest Form: Disability Inclusion in Child Care	28	1	.5	14	\$58.96	\$825.44
Total Burden and Cost Estimates:				28	\$58.96	\$1650.88

### **A13. Cost Burden to Respondents or Record Keepers**

There are no additional costs to respondents.

**A14. Estimate of Cost to the Federal Government**

The total cost for the data collection activities under this current request will be approximately \$4000 (4 contractors and one federal staff member each devoting up to 4 hours at \$200/hour provided as a high estimate of fully loaded rates).

**A15. Change in Burden**

This is for an individual information collection under the umbrella formative clearance for program support (0970-0531).

**A16. Plan and Time Schedule for Information Collection, Tabulation and Publication**

The information collected in the Interest forms will solely be used by the project team to understand State and Territory interest in and capacity to engage in TA implementation activities. The information provided in the form will not be publicly used.

**A17. Reasons Not to Display OMB Expiration Date**

All instruments will display the expiration date for OMB approval.

**A18. Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions are necessary for this information collection.

**Attachments**

- Interest Form: Integration of Child Care and Part C
- Interest Form: Disability Inclusion in Child Care