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

From: Ruth Friedman
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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 clarify existing questions and make a small number of existing questions more specific to capture known common areas of quality expenditure across states and territories. Section 13, which focuses on collecting information on ARP Act Stabilization grants, has been significantly abridged to avoid duplication of efforts, as OCC is collecting information on the American Rescue Plan (ARP) Act Stabilization grants through the ACF-901 report (0970-00584) and state/territory interviews approved under the umbrella generic, Formative Data Collections for ACF Program Support (OMB #: 0970-0531).

Overview of Requested Changes

This nonsubstantive change request is proposed to reflect changes in the context of the data collection (e.g. removing or updating COVID-19 related questions and reflect OCC priorities), and to remove duplications within the QPR and across OCC data collection tools. The nonsubstantive changes to the QPR include a revision to the progress update question for each allowable quality activity section (10 sections total) on the QPR. No additional information is being requested from states and territories regarding progress. Additionally, the Spending field of each allowable quality activity section (10 sections total) on the QPR now asks states and territories to describe the use of CCDF funds, which had been optional in the prior form. States and territories are required to have this information for fiscal reporting, so we determined that

this would not be a significant burden and estimate that this can be completed within the previous burden estimates for the QPR.

The form initially included thirteen questions in Section 13 focusing on information related to ARP Act Stabilization grants. This section has been significantly abridged to avoid duplication of efforts with other data collection efforts in OCC related to ARP Act Stabilization grants (ACF-901 report and State/Territory interviews). The section, which originally included 13 questions, now includes only three questions. The public reporting burden hours for the form have been reduced from the initially approved 75 hours to 65 hours to reflect this change. Prior to the addition of Section 13 the QPR was estimated to take an average of 60 hours to complete, and this was increased to 75 hours with the addition of Section 13. We have removed 10 questions from Section 13, which is roughly two-thirds of the section, and therefore have reduce the estimated average time to complete to 65 hours.

Additionally, to capture common areas of quality expenditure among states and territories, two questions were added to the form. In some cases (specified in the bullets below) the information was already covered in the previous version of the form, and is now broken out into a separate question to facilitate clearer responses. The two questions added to the form are:

- Question on compensation and benefits improvements not tied to credential attainment (2.2.2) This question was previously embedded in question 2.2. Question 11.5 on general supply building efforts as a follow-up to previous question 11.4 about analysis of supply/demand.

Finally, 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 expanded to cover known areas of state/territory quality spending, such as:

- Expanded question on infant/toddler health specialists to include common infant/toddler supports (5.3)
- Expanded question on health and safety needs of children to include other options beyond PPE, which was less common in the current reporting period (10/1/21-9/30/22) (11.2)
- Expanded question on Diversity, Equity, and Inclusion practices. Changed from narrative to checkboxes, reducing burden on respondents (11.6).

To account for additional or expanded questions we removed three pre-existing questions, thus the nonsubstantive do not increase the overall burden on states and territories. The questions that were removed from the FFY21 QPR are:

- Question 5.4 regarding an analysis of supply and demand for infant/toddler slots
- Question 7.4 on conducting virtual monitoring
- Question 11.7 on technical assistance received by providers

Time Sensitivities

OCC is transitioning to a new online submission system for the QPR. Given this transition, a minimum of two months is needed to create the form module in the system. We would like to have the system go live on October 15, 2022 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 15, 2022.