

**Information to Inform the Office of Child Care
about Implementation of Child Care American
Rescue Plan Act (ARPA) Funds for
Tribal Lead Agencies in the
Initial and Full Implementation Stages**

Formative Data Collections for Program Support

0970 – 0531

**Supporting Statement
Part A - Justification**

May 2022

Submitted By:
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A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval to conduct interviews with Child Care and Development Fund (CCDF) Lead Agencies to inform technical assistance and other supports provided by the Office of Child Care (OCC) for Tribal CCDF grantees. This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531):

- Delivery of targeted assistance related to program implementation or the development or refinement of program and grantee processes.
- Planning for provision of programmatic or evaluation-related training or technical assistance (T/TA).

Background

On March 11, 2021, the American Rescue Plan Act (ARPA) was signed by the President. As part of ARPA, separate funding was included, ARP stabilization grants (over \$719 million for Tribal Lead Agencies). The funds under ARPA require Lead Agencies to provide stabilization grants to child care providers who were affected by COVID-19. Tribal Lead Agencies have expressed challenges with the new funding stream. In response to these concerns, and because this is a significant investment, OCC seeks to collect information from all Tribal CCDF Lead Agencies to inform our technical assistance activities and understand what challenges and supports they need to have capacity to spend this funding. Challenges and supports differ depending on the implementation stage of the grantee. We are currently collecting information from agencies in the exploration and developing phases (information collections approved under this umbrella generic on February 14, 2022 and April 15, 2022). The current request pertains to Tribal Lead Agencies determined to be in the initial or full implementation stage.

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 Approach

To inform technical assistance and program support activities, OCC proposes to conduct one-hour semi-structured interviews with all Tribal CCDF Lead Agencies throughout different stages of implementation: exploration, development, implementation. This request is specific to the interviews for Tribal Lead Agencies in the initial and full implementation stages. OCC received approval to conduct exploration-stage interviews with Tribal CCDF Lead Agencies under this umbrella generic in February 2022, and to conduct development-stage interviews with Tribal CCDF Lead Agencies under this umbrella generic in April 2022. Information collected through these initial steps informed this final request specific to interviews for the actual implementation stage.

The initial and full implementation-stage interview asks about Tribal Lead Agencies' progress in setting up processes to award grants to child care providers, strategies used to target child care

providers serving low-income communities, success stories, challenges experienced in issuing grants, and supports needed to issue grant awards. Information will be used by OCC to support these agencies during this specific stage of implementation.

Information Collection Plan

OCC's Tribal Child Care Capacity Building Center (TCBC) contractor will set up one-hour calls with each of the Tribal Lead Agencies determined to be in the developing stage of implementation to discuss questions related to ARP funding. A universe of proposed potential interview questions are included in Attachment A (TCBC ARP Act Stabilization Grants TA Implementing Guide). The interview guide includes an initial set of questions and then based on responses to those initial questions, interviewers will select and ask questions that are appropriate for the specific respondent.

A3. Improved Information Technology to Reduce Burden

Lead Agencies will be asked to share the information via structured interviews by phone. TCBC staff will document the information in a spreadsheet.

A4. Efforts to Identify Duplication

Because this is a new activity for Tribal CCDF Lead Agencies, there is no existing data to provide this information.

A5. Involvement of Small Organizations

One hundred fifty-seven (157) Tribal Lead Agencies (TLAs) are considered "small allocation TLAs". These TLAs will be included in the interviews, and interviews will be scheduled at times that are convenient for respondents.

A6. Consequences of Less Frequent Data Collection

Given the timeframe to spend stabilization funds by the end of the FFY 2022, it is necessary for OCC to gather this data quickly in order to adequately provide TA resources and support Tribal CCDF Lead Agencies.

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 the overarching generic clearance for formative information collection. This notice was published on October 13, 2020, Volume 85, Number 198, page 64480, and provided a sixty-day period for public comment. During the notice and comment periods, no substantive comments were received.

A9. Incentives for Respondents

No incentives for respondents are proposed for this information collection.

A10. Privacy of Respondents

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 to the extent permitted by law.

Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Total Burden

Information will be collected from all Tribal CCDF Lead Agencies. The time per response is estimated to take about one hour.

| Instrument | Total Number of Respondents | Total Number of Responses Per Respondent | Average Burden Hours Per Response | Total Burden Hours | Average Hourly Wage | Total Cost |
|--|-----------------------------|--|-----------------------------------|--------------------|---------------------|-------------|
| TCBC ARP Act Stabilization Grants TA Implementing Guide (Attachment A) | 265 | 1 | 1 | 265 | \$38.90 | \$10,308.50 |

Total Annual Cost

The cost to respondents was calculated based on using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2021, which is \$19.45 per hour. To account for the fringe benefits and overhead, the rate was multiplied by two which is \$38.90.

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 \$31,800.

This represents the total number of staff hours – 1,060 (2 hours x 2 staff x 265 Tribal CCDF Lead Agencies) by \$30 per hour.

A15. Change in Burden

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

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

OCC plans to begin collecting this information in May 2022, pending OMB approval.

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.