

# **Tribal Early Learning Initiative (TELI) Statement of Interest**

## **Formative Data Collections for Program Support**

**0970 – 0531**

# **Supporting Statement**

## **Part A - Justification**

**April 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 request information from Tribal Child Care and Development Fund (CCDF) grantees who express interest in a collaborative effort to support tribal early childhood systems coordination and partnerships.

### ***Background***

Tribal early childhood programs, including child care, Head Start, and home visiting, often operate in silos, with different funding sources, requirements, policies, and leadership structures. Tribal communities and their leadership often indicate investment in tribal capacity to foster more integrated early childhood systems is needed but not easy, even under the most favorable of circumstances. The recent funding increases in the Tribal Child Care and Development Fund (CCDF) program present an opportunity for tribes to enhance their early childhood systems to meet their goals, promote child development, and support integration of services to improve child and family outcomes.<sup>1</sup> Tribes have an opportunity now to leverage the increased Tribal CCDF resources to sustainably invest in coordinated early childhood systems in a focused and intentional way in what ACF is calling the Tribal Early Learning Initiative (TELI). The TELI offers tribes the opportunity to use Tribal CCDF program funds to support coordinated child care and early childhood services for TELI efforts in their communities and receive various training and technical assistance supports (T/TA).

This proposed information collection will help ACF learn about grantee interest in the TELI and collect technical assistance needs to inform future activities.

### ***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***

The purpose of this proposed information collection is to learn from grantees in the Tribal CCDF if they would be interested in participating in the TELI and about their technical support needs. Tribal CCDF Lead Agencies will separately submit the “TELI Appendix” (Appendix 2 to the FY 2023-2025 Tribal CCDF Plan Preprint<sup>2</sup>) to receive approval to use Tribal CCDF funds to conduct TELI activities. The information collected through the statement of interest is to assist ACF determine T/TA needs for Tribal CCDF grantees who wish to participate in the TELI.

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<sup>1</sup> Coronavirus Aid, Relief, and Economic Security Act (CARES) Act (P.L. 116-136), Coronavirus Response and Relief Supplemental Appropriations Act (CRRSA) (P.L. 116-260), American Rescue Plan Act (ARPA) (P.L. 117-2), and Consolidated Appropriations Act, 2022 (P.L. 117-103)

<sup>2</sup> The FY 2023-2025 Tribal CCDF Plan is approved under OMB #0970-0198

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 training or technical assistance (T/TA).

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

OCC plans to send a request to Tribal CCDF Lead Agencies, which will include a series of questions to gauge interest and TA needs. See the attached Statement of Interest, which includes open-ended questions intended to be completed by tribal CCDF program directors/administrators. ACF will then follow up individually with each Agency to discuss next steps. The responses to the questions are therefore solely intended to be used by ACF to inform the types supports needed by tribes. If any information collections that are subject to PRA are planned as part of the TELI, ACF will submit a separate request for those activities.

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

Respondents who are interested in the TELI will submit a statement of interest via email to ACF.

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

This information collection is specific to the TELI and has very specific questions intended to determine need and interest in the TELI that cannot be found anywhere else.

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

No small businesses will be involved with this information collection.

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

This is a onetime 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 the overarching generic clearance for formative information collection. This notice was published on November 3, 2020, Volume 85, Number 213, page 69627, and provided a sixty-day period for public comment. During the notice and comment period, no substantive comments were received.

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

Consultations have taken place with the CCDF Tribal T/TA provider.

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

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

## **A10. Privacy of Respondents**

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.

## **A11. Sensitive Questions**

There are no sensitive questions in this data collection.

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

### ***Burden Estimates***

Estimated burden for the statement of interest is one response per grantee at 4 hours per response. ACF expects each grantee will engage with an average of 2 individuals and that each individual will spend about two hours each on the response. There is an expectation that up to 15 Tribal CCDF grantees will respond to this information collection.

Estimated burden for the statement of support is one response per grantee from tribal or organizational leadership at 2 hours per response. This includes the time for leadership to review the statement of interest and draft a brief statement of support. There is an expectation that up to 15 individuals will be involved with this piece of the information collection.

### **Cost Estimates**

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for 21-0000 Community and Social Service Occupations and wage data from May 2021, which is \$25.94 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$51.88.

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

| Instrument                             | Total Number of Respondents | Total Number of Responses Per Respondent | Average Burden Hours Per Response | Total Burden Hours | Average Hourly Wage | Total Annual Cost |
|--|-----------------------------|--|-----------------------------------|--------------------|---------------------|-------------------|
| TELI Statement of Interest             | 30*                         | 1  | 2                                 | 60                 | \$51.88             | \$3,112.80        |
| Tribal Leadership Statement of Support | 15                          | 1  | 2                                 | 30                 | \$51.88             | \$1,556.40        |
| Totals:                                | 45                          | 1  | 2                                 | 90                 | \$51.88             | \$4,669.20        |

\*30 respondents is based on an estimate of 2 respondents at each of the 15 grantees.

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

There are no additional costs to respondents.

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

The estimated annual cost to the federal government is the amount of time for 2 federal staff to review the submissions and would be a onetime review. This is not an annual occurrence. Mean hourly wage of 2 staff at the GS-13 level -  $\$56.30 \times 15 \times 2$  hours per response = \$3,378.80

### **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**

Responses will be due July 1, 2022. This information will be used for technical assistance plans, project specific reports, or other documents relevant to stakeholders such as federal leadership and staff, grantees, local implementing agencies, and T/TA providers.

### **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.