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

From: Christine Johnson-Staub
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Administration for Children and Families (ACF)

Date: December 14, 2022

Subject: Change Request – Generic Information Collection under Formative Data Collections for ACF Program Support Umbrella Generic (OMB #0970-0531)

This memo requests approval of changes to the approved generic information collection (GenIC), Information to Inform the Office of Child Care about Implementation of Child Care American Rescue Plan Act (ARPA) Funds (OMB #0970-0531).

Background

OMB approved a GenIC request for two interview guides related to the implementation of Child Care American Rescue Plan Act (ARPA) funds on November 26, 2021.

These include:

- ARP Stabilization Interview Questions
- ARP Supplemental Interview Questions

Some states and territories are still developing their plans and implementing activities using their COVID-19 supplemental funds. As such, the Office of Child Care (OCC) would like to continue to complete interviews through 12/31/2023. It is important that this data collection be extended to continue to capture data that will help support CCDF Lead Agencies as they continue to plan and implement activities. Further, the child care industry continues to experience workforce shortages and a low supply of child care providers. These interviews provide insight into how the funds (particularly impacts on children, families, and the workforce) can help, or are helping, address these issues, and whether the Lead Agency needs support.

OCC has revisited what information is needed to better understand how states and territories are spending, or planning to spend, their ARP Stabilization and Supplemental funds. Based on the review of the information collection and the status of work by states and territories, OCC is proposing: a) changes to ARP Supplemental questions that will decrease the level of effort and more accurately capture where states are improving their child care systems and b) replacing current ARP Stabilization interview questions with new questions that better reflect states' current stage of implementation of the funds.

Overview of Requested Changes

New ARP Stabilization Interview Protocol

The new ARP Stabilization Interview protocol has a heightened focus on the spend down of

ARP Stabilization funds given that the liquidation deadline for this funding stream is approaching in September 2023. There are no longer questions related to obligating funds or questions for states that have yet to release applications, as those questions are no longer applicable. We also removed questions where we had gathered sufficient information (for example, how states have directed ARP Stabilization funds to the workforce and whether states are continuing stabilization payments with alternate funding sources).

Instead, the new questions are designed to better understand where states are in outlaying their ARP Stabilization funds. We propose limiting the number of respondents over the next year to states that have not outlaid 100% of ARP stabilization funds. Questions are formatted to align with where states are in spending down the funds and organized into three categories – (1) states currently distributing payments, (2) states with plans for future rounds of subgrants, (3) states with no plans for future rounds of subgrants. The questions within these categories will help OCC identify when states will complete spending down ARP Stabilization funds and whether they need technical assistance to do so.

Updated Supplemental Interview Protocol

From the Supplemental Interview protocol, we removed questions that are no longer necessary (for example, for what period changes are temporary, whether states are offering wage ladders). We then added questions to ask how all COVID-19 supplemental funds are allowing states to invest in these activities, since states are using funding streams other than ARP Supplemental. The rephrasing of the question will allow us to better understand where states are making enhancements to their child care systems.

Overall, these proposed content changes are still within the described purpose of the data and ACF will continue to use the information collection as previously described.

We also propose updating the frequency of interviews from monthly to every other month. The estimated number of respondents remains unchanged for the Supplemental Interview protocol but reducing the frequency of interviews and limiting the number of respondents to the Stabilization Interview protocol to those that have not outlaid 100% of ARP Stabilization funds decreases the burden estimate overall.

We have included the following materials with this request:

- New ARP Stabilization Interview Questions
- Revised ARP Supplemental Interview Questions
- Revised Supporting Statement A

Time Sensitivities

Any lapse in data collection impedes OCC's ability to support Lead Agencies support the child care sector and children and families. As such, we request a response as soon as possible.