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Office of Management and Budget (OMB)

From: Elaine Stedt, Director, Office on Child Abuse and Neglect
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Administration for Children and Families (ACF)

Date: November 19, 2024

Subject: NonSubstantive Change Request – Community-Based Child Abuse Prevention Program (OMB #0970-0155)

This memo requests approval of nonsubstantive changes to the approved information collection, Community-Based Child Abuse Prevention Program (OMB #0970-0155).

Background

In March 2024, the Office of Management and Budget approved an extension without change of this currently approved collection. The Child Abuse Prevention and Treatment Act (CAPTA), which authorizes the CBCAP program, states the following under Section 202 Eligibility (specifically Sec. 202(1)(D)):

> "in the case of a State that has designated a State trust fund advisory board for purposes of administering funds under this title (as such, title was in effect on the date of the enactment of the Child Abuse Prevention and Treatment Act Amendments of 1996) and in which one or more entities that leverage Federal, State, and private funds (as described in subparagraph (C)) exist, the Governor shall designate the lead entity only after full consideration of the capacity and expertise of all entities desiring to be designated under subparagraph (A);"

In its guidance to states (see CBCAP Application Requirements Template), the Children's Bureau (CB) requires states to submit an original signed letter from the Governor as part of the annual application of CBCAP funds. The guidance further requires the letter to include the following information (1) designate the lead agency to receive the funds; and (2) contain a statement that the lead agency was designated only after giving full and equal consideration to the capacity and expertise of all entities desiring to be the lead agency, to the extent such requirement applies.

Since approval of this information collection, states have informed CB it is challenging and takes considerable time to fulfill this requirement under current guidance. To address these challenges, the CB is seeking approval of nonsubstantive changes to the process (outlined in detail below) for how this information is collected.

Overview of Requested Changes

CB proposes a revision to the "Governor's Assurance Statement," which is included as an

Attachment in the CBCAP Program Instruction. The proposed revision is to include the statement “the lead agency was designated only after giving full and equal consideration to the capacity and expertise of all entities desiring to be the lead agency” on this form, which is also required for the annual application and signed by the Governor. CB believes this revision will lessen the burden on states to meet the requirement and is responsive to requests to remove barriers, which would also likely delay the award of annual CBCAP funds.

Additionally, for clarification and to ensure materials are current under this OMB number, CB has adjusted the way in which documents related to this request are included. Specifically:

1. The Program Instruction, which is updated annually with current dates and relevant program overview information that is not directly relevant to only this information collection request is now included as a supplementary document, as an example.

2. The Reporting Requirements and Application Outline are now included as stand-alone documents and uploaded as the information collection documents.

Time Sensitivities

CB plans to include this update in its guidance to States on the requirements to apply for fiscal year 2025 funding, which is historically distributed to states annually in March.