

Child Care and Development Fund (CCDF) Information Technology Matters 3

**Formative Data Collections for Administration for Children
and Families (ACF) Program Support**

**OMB Information Collection Request
0970 – 0531**

Supporting Statement Part A - Justification

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A1. Necessity for the Data Collection

The Office of Child Care (OCC), under the Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS), seeks approval to collect information about data and information technology (IT) systems used by State and Territory Lead Agencies that receive Federal funding for the administration of the Child Care and Development Fund (CCDF) Program, generally referred to as Lead Agencies. This effort supports ACF's work to improve accessibility and quality of child care for families and improving and simplifying administrative processes for child care providers.

Background

The Data and Information Systems Consultation Center (DISCC), part of ACF, is conducting a series of focus groups (referred to as peer learning sessions), called IT Matters, to help CCDF Lead Agencies share information about their experiences using IT and data systems to deliver high quality, equitable child care for families and providers. These sessions build on each other to be responsive to the needs of Lead Agencies in a timely manner. As part of feedback from attendees for each session (see DISCC Universal Technical Assistance Surveys; OMB # 0970-0617), attendees are requested to identify additional topics of interest. DISCC analyzes those responses to understand the needs of Lead Agencies and considers those topics for future sessions, including new topics or deeper discussions on prior topics.

This request is for the third peer learning session in the IT Matters series which focuses on the improvement of payment practices for child care providers using data and IT systems. OCC received approval for an initial peer learning session in August 2024 (see Child Care and Development Fund (CCDF) Information Technology Matters 1; OMB #0970-0531) which focused on current technology and impacts from 2024 CCDF Final Rule, etc. The second peer learning session, IT Matters 2 (see CCDF IT Matters 2; OMB #0970-0531), which focused on IT procurement was approved in September 2024.

IT, including data and IT systems, plays a significant role in ACF's goals around accessibility and quality of child care improvements to administrative processes, such as enabling a family to search online for child care opportunities, applying for and receiving CCDF payments, and enrolling online with child care providers that fulfill their needs. Similarly, child care providers use IT to understand CCDF requirements, apply to become a CCDF child care provider, enroll in the program, receive CCDF payments, and provide data and reports to Lead Agencies about their child care operations.

The Executive Order (EO), *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (EO 13985)¹ emphasizes consulting with communities that have been historically underserved by Federal policies and programs. The Presidential Memorandum on *Restoring Trust in Government through Scientific Integrity and Evidence-Based Policy Making*², as well as the *ACF Evaluation Policy*³ discuss community engagement and inclusion in research. ACF programs promote the economic and social well-being of families, children, individuals, and communities. Consistent with the referenced guidance documents, and to ensure involvement with a variety of people with diverse experiences and perspectives with ACF programs, ACF must actively collect information to learn more about program services that ACF funds, or similar to those funded. This information is necessary for ACF

¹ <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>

² <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/memorandum-on-restoring-trust-in-government-through-scientific-integrity-and-evidence-based-policymaking/>

³ <https://www.acf.hhs.gov/opre/report/acf-evaluation-policy>

to gain a better understanding of processes, needs, and potential improvements related to ACF programs and associated services to inform ACF decision-making and program support.

Additionally, “The 2024 Child Care and Development Fund (CCDF) Final Rule updates regulations (45 CFR Part 98) to help working families afford child care and broadly support child care quality and accessibility in communities. Policies included in this final rule are designed to:

- Lower child care costs for families;
- Improve payments to child care providers;
- Increase child care options for families;
- Make enrollment easier and faster for families; and
- Increase clarity in CCDF requirements.”⁴

To comply with the 2024 CCDF Final Rule, many Lead Agencies may need to make changes to existing data and IT systems, and some may need to put in place new data and IT systems. This information collection will provide insights into the challenges Lead Agencies may face so that OCC and their contractor, DISCC, can provide supportive training/technical assistance (T/TA), such as toolkits for developing an IT strategic plan, an IT strategic roadmap, and one or more IT project plans. The information will also facilitate collaboration with Agencies to develop and implement these plans to comply with the 2024 CCDF Final Rule.

Legal or Administrative Requirements that Necessitate the Collection

There are no legal or administrative requirements that necessitate the collection. ACF is collecting this information at the agency's discretion.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Use

The main purpose of this information collection is to gain a better understanding of the current condition of data and IT systems for development of appropriate T/TA that improves data and IT systems over time.

The information collected will be used by ACF to learn more about program-related services, including processes and needs of funded programs at Lead Agencies who serve families and providers. OCC/DISCC will use the information to identify T/TA opportunities that are of notable value to Lead Agencies for improving data and IT systems used to administer their CCDF Programs, which in turn improves child care outcomes identified in the 2024 CCDF Final Rule.

As part of their voluntary participation in a peer learning session and discussion, Lead Agencies may identify areas where they are experiencing success, activities they performed to foster success, lessons learned for overcoming obstacles, as well as residual needs. Participation in the discussion is not required, and attendees may participate in all, or portions, of the peer learning session. OCC/DISCC will summarize information discussed in a short report for internal use only. The report will not be shared externally. In sharing observations from information collected, even internally, DISCC will describe the study methods and limitations regarding generalizability.

⁴ [2024 Child Care and Development Fund \(CCDF\) Final Rule Fact Sheet | The Administration for Children and Families \(hhs.gov\)](#)

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531):

- Delivery of T/TA related to data and IT systems used for CCDF Program implementation.
- Delivery of T/TA related to the development and implementation of IT-related policies and processes (e.g., the development and refinement of data governance and data management practices to improve data quality and analytic and reporting outcomes).
- Planning for programmatic or evaluation-related T/TA (e.g., development of strategic IT roadmaps and methods to improve IT procurement and delivery oversight).
- Obtaining input on the development of key performance indicators (KPIs) used by Lead Agencies to evaluate the effectiveness and efficiency of their data and IT systems (e.g., cost of ownership and methods for measuring user satisfaction).
- Assessing effectiveness of T/TA to improve data and IT systems through cyclical measurement.
- Informing the assessment of the maturity of data and IT systems to demonstrate improvement through cyclical measurement.
- Obtaining feedback about processes and/or practices to inform OCC program development or support (e.g., identifying areas where best practices can be deployed to improve outcomes or subsets of Lead Agencies that can benefit from similar solutions that improve data and IT systems).
- Development of learning agendas and research priorities to improve and expand knowledge in best practices for data and IT system planning, acquisition, development, testing, deployment, operations, and maintenance.

Processes for Information Collection

DISCC will conduct a series of focus groups (referred to as peer learning sessions), called IT Matters, using commercial software tools used for virtual meetings, such as Zoom or Teams. With respondent permission, sessions will be recorded to allow for discussion to continue and flow, therefore reducing burden. Recordings will be used for internal purposes only. The transcript from these sessions will be used with a qualitative assessment tool (e.g., Qualtrics, Atlas.TI, Dedoose) to identify trends and patterns and produce visualizations (e.g., wordclouds) that provide an image of the most frequently observed words or themes.

Registration and feedback surveys used as part of the IT Matters series were approved separately under the ACF Generic for Information Collections related to Gatherings (0970-0617; title: Data and Information System Consultation Center Universal Technical Assistance Surveys).

A3. Improved Information Technology to Reduce Burden

DISCC will use Zoom or Teams to conduct the peer learning sessions. Attendees may participate in the discussion verbally or by posting to the chat. With respondent permission, sessions will be recorded which will help to reduce burden. The transcript from these sessions, including verbal and chat, will be used with a qualitative assessment tool (e.g., Qualtrics, Atlas.TI, Dedoose) to identify trends and patterns and produce visualizations (e.g., wordclouds) that provide an image of the most frequently observed words or themes.

A4. Efforts to Identify Duplication

The information to be collected by the IT Matters peer learning sessions does not exist currently. While isolated examples of the information sought may have been discovered in discussion with other OCC offices, data was anecdotal and unreliable because it did not come from the Lead Agencies that are best positioned to provide information about the current condition and effectiveness of their data and IT systems. Therefore, it would not be reasonable to use this information to assess Lead Agency needs for T/TA that will help them improve their data and IT systems. Peer learning sessions provide a means for ACF to understand current needs of the Lead Agencies without over burdening them. There is no preparation required by participants.

A5. Involvement of Small Organizations

No small businesses will be requested to respond to this information collection. ACF/OCC has contracted with a small business to develop and conduct the IT Matters peer learning sessions.

A6. Consequences of Less Frequent Data Collection

DISCC has considered the frequency and methods proposed for collecting information to balance its need to preserve and focus resources with the burden of collecting information from Lead Agencies. OCC anticipates conducting a peer learning session 4 times per year. The cadence will be especially useful given the recently published 2024 CCDF Final Rule and the fact that many Lead Agencies may need to make changes to data and IT systems to comply with the new rule. The quarterly cycle gives Lead Agencies time to progress with their plans and come together to discuss and learn from each other about successes and challenges. DISCC can then better understand where additional T/TA will be beneficial to Lead Agencies.

This information collection covers one peer learning session, referred to as IT Matters 3.

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 this information collection request to extend approval of the umbrella generic with minor changes. The notice was published on January 28, 2022, (87 FR 4603), and provided a sixty-day period for public comment. ACF did not receive any comments on the first notice. A second notice was published, allowing a thirty-day period for public comment, with submission of the request to OMB. ACF did not receive any comments on the second notice.

Consultation with Outside Experts

ACF/OCC has contracted with Keith L. Scott and Associates (KLSA), to collect information from Lead Agencies about their data and IT systems; identify, design, and deliver T/TA to assist Lead Agencies in improving their data and IT systems; benchmark the current condition of Lead Agency data and IT systems; and measure effectiveness of T/TA to improve Lead Agency data and IT systems over time. Contract staff provided the expertise in the development of this information collection.

A9. Tokens of Appreciation for Respondents

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

A10. Privacy of Respondents

Individual responses will not be released publicly. Privacy of Lead Agencies and individual attendees within the Lead Agencies will be maintained. Lead Agencies will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private.

Personally Identifiable Information will not be collected, and data will not be retrieved or reported by an individual's personal identifier.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Burden Estimates

Peer learning sessions are scheduled for 60 minutes (1 hour), including introductions, discussions, and wrap-up. Peer learning sessions are open to all Lead Agencies and all staff within the Lead Agency.

For each peer learning session, DISCC estimates approximately 20% of the 51 State Lead Agencies (which includes the District of Columbia) will attend, or 10; 40% of the 5 Territory Lead Agencies will attend, or 2; and 5% of the 536 Tribal Lead Agencies will attend, or 27.

DISCC estimates an average of two (2) staff members from State and Territory Lead Agencies and one (1) staff member from Tribal Lead Agencies will attend for a total of about 24 staff members from State and Territory Lead Agencies and 27 staff members from Tribal Lead Agencies, or 51 total attendees.

Cost Estimates

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Child, Family, and School Social Workers for State Government, excluding Schools and Hospitals (OEWS Designation) [21-1021] and wage data from May 2023, which is \$27.44 per hour. To account for fringe benefits and overhead the rate was multiplied by two (2) which is \$54.88.

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
IT Matters 3	51	1	1	51	\$54.88	\$2,798.88

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 is estimated to be \$15,180, including approximately 2 hours Federal labor to support review of the report and 60 hours contractor labor to support collection and analysis of data.

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

Pending OMB approval, ACF/OCC plans to conduct IT Matters on or about December 10, 2024.

OCC/DISCC will summarize information discussed in a short report for internal use only. The report will not be shared externally. In sharing observations from information collected, even internally, DISCC will describe the study methods and limitations regarding generalizability.

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.

Attachments

Attachment A – IT Matters 3 Discussion Questions