

Attachment A: Responses to Public Comments

The Office of Child Care (OCC) received two comments during the 60-day public comment period on the Child Care Improper Payments Data Collection Instructions (DCI) from state CCDF Lead Agencies. One comment identified a technical error and the second comment offered feedback on the proposal to standardize the root causes of errors in the ACF-404 State Improper Payments Report. The responses are outlined below. Note: because Comment #2 included three distinct points, OCC's response is broken out accordingly.

Comment #1 [California Department of Social Services, Child Care and Development Division]

- The Lead Agency expressed appreciation that the revisions provide additional clarity to the instructions and noted a technical error in the Introduction section (page 1). They pointed out that the bullet that outlines the changes made to the Record Review Worksheet referenced *Section IV* but should instead reference *Section V*.
 - OCC Response: OCC appreciates the careful review conducted by the Lead Agency and has corrected the chapter references in the Introduction section. This was an inadvertent formatting error in the draft DCI that went out with the 60-day request for public comment.

Comment #2 [North Carolina Division of Child Development and Early Education]

- The Lead Agency expressed agreement with OCC's proposal to standardize the root causes of errors on the ACF-404 State Improper Payments Report (Item 19) and noted that this change will streamline the completion of the report, enable states to aggregate errors in a categorical way, and support overall data analysis and reporting.
 - OCC Response: OCC appreciates the Lead Agency's feedback on this proposed change and agrees that standardizing the root causes of error will not only enhance the quality of OCC's data reporting and analysis over time, but also streamline states' report preparation and submission.
- The Lead Agency agreed with OCC's proposal to include an 'other' category in the drop-down list of standardized root causes of error in Item 19 of the ACF-404 and recommended that the description field for 'other' allow at least 500 text characters so states can fully describe the error.
 - OCC Response: OCC will consider the Lead Agency's suggestion to ensure that text fields allow enough space for states to fully describe their error cause if they choose 'other' when working with the IT developers to build the updated report into the data system.
- The Lead Agency noted that although they are supportive of this proposed change, they do not believe the standardization of root causes of errors will be fully effective at helping individual states target specific action steps related to their state policies when developing action steps for ACF-404 Item 20.

- o OCC Response: OCC agrees with the Lead Agency's comment that states need to consider their state policies when developing action steps to address root causes of error, and notes that Item 20 in the ACF-404 already allows for states to describe their state-specific action steps. The proposed change to standardize the error causes in Item 19 will not impact the ability for states to describe their action steps in Item 20. OCC will consider this feedback to inform technical assistance and training activities for states to help them complete the ACF-404.