

To: Kelsi Feltz
Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget (OMB)

From: Anne-Marie Twohie
Acting Director
Office of Child Care
Administration for Children and Families (ACF)

Date: June 3, 2025

Subject: Non-Substantive Change Request – ACF-696T Child Care and Development Fund (CCDF) Financial Report for Tribes (OMB #0970-0510)

This memo requests approval of non-substantive changes to the approved information collection, Child Care and Development Fund (CCDF) ACF-696T Financial Report for Tribes, (OMB #0970-0510).

Background

The Child Care ACF-696T Financial Report form is used by tribal grantees to report annual expenditures. The ACF-696T Financial Report form is currently approved through June 30, 2027 with an annual reporting frequency.

On December 21, 2024, the American Relief Act (ARA) of 2025 (42 USC 9858c(c)(3)), was enacted. The ARA provided \$250 million of supplemental discretionary non-disaster and another \$250 million of supplemental discretionary disaster funding to the Child Care and Development Block Grant (CCDBG) program. The ACF-696T Financial Report form currently does not have any means for reporting how ARA non-disaster funds are used.

ACF is seeking approval for non-substantive changes to this form and form completion instructions to accommodate the newly authorized ARA funds.

Overview of Requested Changes

The ACF-696T Financial Report form contains 16 columns of data (Columns A-P). During the most recent approval process (last April 2024), Column G was removed because it was never used, while the remaining columns all retained their same column letter and name.

ACF proposes the following updates to the current ACF-696T Financial Report form and instructions:

- (1) Put the Column G back into the form;
- (2) Change the name of this Column G to indicate ARA supplemental discretionary funding;
- (3) Add descriptive language in the form completion instructions about ARA disaster and non-disaster reporting requirements;
- (4) Make a correction to the form completion instructions about reporting construction

obligation reporting.

The above changes will allow for comprehensive reporting of financial information as well as improved simplicity and clarity for user of the ACF-696T Financial Report forms. We consider these changes to be non-substantive.

Time Sensitivities

Tribes received their ARA supplemental discretionary non-disaster funds on January 13, 2025. Since the annual reporting frequency remains the same, the first report due will be December 29, 2025. The changes to the form will allow grant recipients to report their ARA non-disaster expenditures because there is currently no mechanism for tribes to report these expenditures. ACF needs this information to ensure proper monitoring of grant obligations and liquidations made during the FFY. It takes significant staff hours to update financial report forms in ACF's grant reporting system. Therefore, a prompt approval of these edits is requested to enable timely reporting by CCDF grant recipients.