Information to Inform the Office of Child Care about Implementation of Child Care American Rescue Plan Act (ARPA) Funds

Formative Data Collections for Program Support

0970 - 0531

Supporting Statement Part A - Justification

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A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) received approval to conduct interviews with Child Care and Development Fund (CCDF) Lead Agencies to inform technical assistance and other supports provided by the Office of Child Care (OCC). This information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531):

- Delivery of targeted assistance related to program implementation or the development or refinement of program and grantee processes.
- Planning for provision of programmatic or evaluation-related training or technical assistance (T/TA).

Currently, this approved information collection includes two interview guides related to the implementation of Child Care American Rescue Plan Act (ARPA) funds:

- 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 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.

Additionally, 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.

OCC has also updated the burden estimates to reflect an update in frequency of interviews and the number of respondents to an interview (see section A12 for additional information). Since the new ARP Stabilization interview questions aim to understand Lead Agency plans for fully spending down ARP Stabilization funds, OCC is proposing to only ask these questions to Lead Agencies that still have ARP Stabilization funds remaining. Additionally, OCC is proposing to change the frequency of interviews from monthly to every other month to decrease the burden on respondents. Most Lead Agencies are on track to spend down ARP Stabilization funds by the deadline of September 30, 2023, and there are not drastic changes in Lead Agency implementation plans for ARP Supplemental funds each month as evidenced by prior interview rounds. Therefore, OCC has identified every other month as a more appropriate cadence for collecting updates from Lead Agencies.

Background

On March 11, 2021, the American Rescue Plan Act (ARPA) was signed by the President. As part of ARPA, separate funding was included, ARP stabilization grants (almost \$24 billion), along with supplemental funds (almost \$15 billion) for the Child Care and Development Block Grant Act (CCDBG). The funds under ARPA are twofold. They first require Lead Agencies to provide stabilization grants to child care providers who were affected by COVID-19. Secondly, they provide additional funds to carry out the CCDBG program under the CCDBG Act of 2014, and are encouraged to increase provider payment rates, and increase workforce compensation. Because this is a significant investment, OCC is collecting information from CCDF Lead Agencies to inform our technical assistance activities for Lead Agencies and understand what challenges and supports they need to have capacity to spend this funding.

Legal or Administrative Requirements that Necessitate the Collection

There are no legal or administrative requirements that necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Approach

To inform technical assistance and program support activities, OCC is collecting information from CCDF Lead Agencies through regular interviews. There are two sets of questions based on the two funding streams. The first set of questions asks about states' progress in setting up processes to award grants to child care providers, strategies used to target child care providers serving low-income communities, success stories, challenges experienced in issuing grants, and supports needed to issue grant awards. The second set of questions asks about how states are spending the supplemental funding, what activities they are spending the funds on, and what challenges they are experiencing. These questions are a follow up to a set of questions asked to states about supplemental funding in May through November 2022 in a previous OMB approval.

Information Collection Plan

OCC asks staff in the 10 OCC regional offices to incorporate questions related to ARP funding as part of their regular monthly calls with state Lead Agencies. Each region was requesting this information monthly, but OCC is proposing to shift the frequency to only ask the questions bimonthly beginning in January 2023 (pending OMB approval) through December 2023 (12 months). Data will continue to be collected from the CCDF Lead Agencies in 50 states, DC and Puerto Rico.

The proposed modifications to the supplemental interview questions are included in Attachment B (Revised ARP Supplemental Interview Questions). The new stabilization interview questions are included in Attachment A2: New ARP Stabilization Interview Questions.

A3. Improved Information Technology to Reduce Burden

Lead Agencies will continue to be asked to share the information via structured interviews by phone. OCC will document the information in a spreadsheet. All interviews will be recorded and transcribed.

A4. Efforts to Identify Duplication

Because this was a new activity for CCDF Lead Agencies, there was no existing data to provide this information. These questions are a follow up to a set of questions asked to states about supplemental funding in May through December 2022 in a previous OMB approval.

A5. Involvement of Small Organizations

No small organizations will be involved.

A6. Consequences of Less Frequent Data Collection

Given the timeframe to spend stabilization funds by the end of the FFY 2023 and supplemental funds by the end of FFY 2024, it is necessary for OCC to gather this data quickly and regularly to adequately provide technical assistance resources and support states.

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, in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice.

A9. Incentives for Respondents

No incentives for respondents are proposed for this information collection.

A10. Privacy of Respondents

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law.

Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Total Burden

For the remaining ARP Stabilization interviews, information will be collected from 49 CCDF Lead Agencies that have not fully spent down their ARP Stabilization funds. For the ARP Supplemental interviews, information will be collected from the CCDF Lead Agencies in 50 states, DC and Puerto Rico. These interviews will occur on a bi-monthly basis over a 12-month period. The time per response is estimated to take about 10 minutes for the stabilization grant questions (Attachment A2) and 20 minutes for the supplemental questions (Attachment B).

Instrument	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Cost
Child Care Stabilization Grants: Interviewer Guide (Attachment A2)	49	6	.167	49	\$38.90	\$1,906
Child Care Supplemental Funds (Attachment B)	52	6	.333	104	\$38.90	\$4,046
Estimated Annual Burden:			153		\$5,952	

Total Annual Cost

The cost to respondents was calculated based on using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2021, which is \$19.45 per hour. To account for the fringe benefits and overhead, the rate was multiplied by two which is \$38.90. https://www.bls.gov/oes/current/oes211093.htm

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 will be \$6,240.

This represents the total number of staff hours - 208 (2 hours x 2 staff x 52 states) by \$30 per hour.

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 OCC plans to begin collecting this information in January 2023 for 12 months, pending OMB approval.

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.