Child Care and Development Fund (CCDF) Tribal Listening Sessions on Use of Information Technology

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

OMB Information Collection Request
0970 – 0531

Supporting Statement

Part A - Justification

October 2024

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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 Tribal Lead Agencies that receive Federal funding for the administration of the Child Care and Development Fund (CCDF) Program. 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 working on an effort to understand the use of data and IT systems by CCDF Lead Agencies. DISCC previously sought and received approval to conduct the CCDF IT Environment Scan[1] which was focused on obtaining information about data and IT systems from State and Territory Lead Agencies.

While developing the CCDF IT Environment Scan, ACF acknowledged that a collection specific to Tribal Lead Agencies would be more appropriate. In collaboration with ACF, OCC/DISCC developed the concept of a series of focus groups, called Listening Sessions, which permit more intimate conversation and sharing of information, especially information relevant to the context of Tribal culture and the sovereignty of Tribal nations. The proposed Tribal Listening Sessions are intended to help Tribal CCDF Lead Agencies share information about their experiences using IT and data systems to support access to high quality child care for families and providers.

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.

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 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;

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[1] ICR Reference Number 202405-0970-006, Child Care and Development Fund (CCDF) Information Technology Environment Scan, approved 7/1/2024

- Make enrollment easier and faster for families; and
- Increase clarity in CCDF requirements."[2]

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 unique challenges Tribal Lead Agencies may face so that OCC/DISCC, can provide supportive and appropriately focused Training and 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 Tribal Lead Agencies to develop and implement their 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 Tribal Lead Agency data and IT systems to inform and develop appropriate T/TA that is culturally sensitive and improves their data and IT systems over time.

The information collected will be used by ACF to learn more about Tribal child care related services, including processes and needs of funded programs at Tribal Lead Agencies who serve families and providers. OCC/DISCC will use the information to identify T/TA opportunities that are of notable value to Tribal 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. T/TA opportunities may include the development of toolkits for developing an IT strategic plan focused on CCDF program goals that improve child care outcomes and toolkits for developing an IT strategic roadmap and one or more IT project plans that improve CCDF data and IT systems.

As part of their voluntary participation in these Tribal Listening Sessions, Tribal 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 Tribal Listening 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.

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.

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[2] [2024 Child Care and Development Fund (CCDF) Final Rule Fact Sheet | The Administration for Children and Families (hhs.gov)](#)

- 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 the series of Tribal Listening Sessions using commercial software tools 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 Tribal Listening Sessions 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 Tribal Listening 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 Tribal Listening Sessions does not exist currently. While isolated examples of the information sought may have been discovered in discussions 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. Tribal Listening Sessions provide a means for ACF to understand current needs of the Tribal 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 Tribal Listening 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 Tribal Lead Agencies. OCC anticipates conducting 15 Listening Sessions. Individuals are requested (and expected) to participate in one listening session only. The number of Listening Sessions will provide flexible opportunities to engage with CCDF Tribal Lead Agencies and ensure group participation is small and comfortable. DISCC can then better understand where additional T/TA will be beneficial to Tribal Lead Agencies.

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 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

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

DISCC estimates approximately 50% of the 264 CCDF Tribal Lead Agencies will attend, or 132. DISCC estimates one (1) staff member from each Tribal Lead Agencies will attend, but a small number of larger Tribes may send multiple attendees. Therefore, burden estimates are for up to 150 respondents. DISCC is planning to conduct 15 Tribal Listening Sessions with approximately 10 attendees per session.

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
Tribal Listening Sessions	150	1	1	150	$54.88	$8,232.00

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 $15,400.00, 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 Tribal Listening Sessions on or about November 5th, 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 – Tribal Listening Session Questions