Tribal Early Learning Initative Statement of Interest – FY26 Cohort

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A - Justification

MAY 2025

Submitted By:

Office of Early Childhood Development

Administration for Children and Families

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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) seeks approval to request information from Tribal Child Care and Development Fund (CCDF) Lead Agencies, Head Start grant recipients, and Tribal Maternal, Infant, and Early Child Home Visiting (MIECHV) grantees who express interest in a collaborative effort to support Tribal early childhood systems coordination and partnerships.

#### *Background*

Tribal early childhood programs, including Child Care, Head Start, and Home Visiting, have different funding sources, regulatory requirements, policies, and leadership structures. Tribal communities and their leadership often indicate investment in Tribal capacity to foster more integrated early childhood systems is needed but challenging. Tribes have an opportunity to sustainably invest in coordinated early childhood systems in a focused and intentional way in what ACF is calling the Tribal Early Learning Initiative (TELI). TELI presents an opportunity for Tribes to enhance their early childhood systems in order to meet their goals, promote child development, and support integration of services to improve child and family outcomes. The TELI offers Tribes the opportunity to support coordinated early childhood services in their communities and to receive various training and technical assistance supports (T/TA).

This proposed information collection will help ACF learn about Tribal interest in participating in the TELI and collect technical assistance needs to inform future activities.  A previous version of the information collection was approved under this umbrella generic in May 2022 for the last TELI cohort and there are no significant changes to the version included with this request.

#### *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 Use***

The purpose of this proposed information collection is to learn from Tribes if they would be interested in participating in the TELI and about their technical support needs. The information collected through the statement of interest is to assist ACF in determining the T/TA needs for Tribes who wish to participate in the TELI.

This proposed 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 training or technical assistance (T/TA).

***Processes for Information Collection***

The ACF Office of Early Childhood Development (ECD) plans to send a Statement of Interest, Support, and Commitment to Tribes, which will include a series of questions to gauge interest and TA needs related to participation in the TELI via either the "TELI Collaborative” or the “TELI Network”. See the attached Statement of Interest, Support, and Commitment, which includes questions intended to be completed by Tribal program directors/administrators. ECD will then follow up individually with each Tribe to discuss next steps, and inform them if they have been accepted as a partner in the initiative. The responses to the questions are therefore solely intended to be used by ACF to inform the types of supports needed by Tribes. If any information collections that are subject to PRA are planned as part of the TELI, ACF will submit a separate request for those activities.  These are the same procedures and uses as with the prior cohort.

**A3. Improved Information Technology to Reduce Burden**

Respondents who are interested in the TELI will submit a statement of interest via email to ECD.

**A4. Efforts to Identify Duplication**

This information collection is specific to the TELI and has very specific questions intended to determine need and interest in the TELI that cannot be found anywhere else.

**A5. Involvement of Small Organizations**

No small businesses or organizations will be involved with this information collection.

**A6. Consequences of Less Frequent Data Collection**

This is a onetime data collection.

**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.

#### *Consultation with Outside Experts*

No consultations have taken place with experts outside of the project team.

**A9. Tokens of Appreciation for Respondents**
No tokens of appreciation for respondents are proposed for this information collection.

**A10. Privacy of Respondents**

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.

**A11. Sensitive Questions**

There are no sensitive questions in this data collection.

**A12. Estimation of Information Collection Burden**

***Burden Estimates***

Estimated burden for the statement of interest and commitment is one response per Tribe at 4 hours per response. ACF expects each program will engage with an average of 2 individuals and that each individual will spend about two hours collaborating on each response. There is an expectation that up to 15 Tribes will respond to this information collection. These estimates are in line with our experiences with the initial information collection approved in 2022.

Estimated burden for the Tribal leadership demonstration of support is one response per Tribe from Tribal leadership at 2 hours per response. This includes the time for leadership to review the statement of interest and draft a brief demonstration of support, which might be in letter formation or Tribal resolution. There is an expectation that up to 15 individuals will be involved with this piece of the information collection.

***Cost Estimates***

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for 21-1099 Community and Social Service Specialists, All Other and wage data from May 2024, which is $28.06 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $56.12. <https://data.bls.gov/oesprofile/>

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| --- | --- | --- | --- | --- | --- | --- |
| Instrument | Total Number of Respondents | Total Number of Responses Per Respondent | Average Burden Hours Per Response | TotalBurden Hours | Average Hourly Wage | Total Annual Cost |
| TELI Statement of Interest and Commitment   | 30\* | 1 | 2 | 60 | $56.12 | $3,367.20 |
| Tribal Leadership Statement of Support  | 15 | 1 | 2 | 30 | $56.12 | $1,683.60 |
| Total Burden and Cost Estimates:  | 90 |  | $5,050.80 |

\*30 respondents is based on an estimate of 2 respondents at each of the 15 Tribes.

**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 $1,941.30

The estimated annual cost to the federal government is the amount of time for three federal staff to review the submissions and would be a onetime review. This is not an annual occurrence.  Base hourly wage of three staff at the GS-13 level is $43.14 X 15 X 3 hours per response = $1,941.30

**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, responses will be due October 1, 2025. This information will be used for technical assistance plans, project specific reports, or other documents relevant to stakeholders such as federal leadership and staff, grantees, local implementing agencies, and T/TA providers.

**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**

FY26 TELI Statement of Interest, Support, and Commitment