Information to Inform the Office of Child Care about Implementation of Child Care American Rescue Plan Act (ARPA) Supplemental Funds – Check-In Call Interview Questions

OMB Information Collection Request 0970 - 0531

Supporting Statement Part A - Justification

December 2023

Type of Request: New

Submitted By:
Office of Child Care
Administration for Children and Families
U.S. Department of Health and Human Services

1. Circumstances Making the Collection of Information Necessary

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, the Administration for Children and Families (ACF) Office of Child Care (OCC) is collecting information from Child Care and Development Fund (CCDF) Lead Agencies to inform technical assistance activities for Lead Agencies and understand supports they need to have capacity to spend this funding.

OCC received approval to conduct interviews with CCDF Lead Agencies to inform technical assistance and other supports provided by OCC. The following two interview guides related to the implementation of Child Care ARPA funds were previously approved under this overarching generic:

- ARP Stabilization Interview Questions
- ARP Supplemental Interview Questions

Data collection using the ARP Stabilization Interview questions is now complete as the liquidation deadline for state ARP Stabilization funds expired on September 30, 2023, and OCC no longer needs to collect information on these funds via interviews.

States and territories are, however, still developing their plans and implementing activities using their ARP Supplemental funds. As such, OCC would like to continue collecting information related to these efforts through December 2024. Based on the review of the information collected to date and the status of work by states and territories, OCC has revised the ARP Supplemental Interview Questions to decrease the level of effort and more accurately capture how states are investing funds. This request is specific to the updated ARP Supplemental Interview Questions (see Attachment A: ARP Supplemental Funds Check-In Call Interview Questions).

Collecting information using the revised ARP Supplemental Funds Check-In Call Interview Questions will allow OCC to continue supporting CCDF Lead Agencies as they implement their spending priorities. 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 can help, or are helping, address these issues (particularly impacts on children, families, and the workforce) and whether the Lead Agency needs support. To support these efforts and to decrease the level of effort for regional office staff and grantees OCC proposes

to incorporate the interviews into monthly check-in calls. These regular check-ins will allow OCC to provide responsive technical assistance on an ongoing basis.

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

2. Purpose and Use of the Information Collection

Overview of Purpose and Approach

To inform technical assistance and program support activities, OCC is collecting information from CCDF Lead Agencies through regular interviews. The interview questions ask how states are spending or planning to spend ARP Supplemental funds in priority areas such as improving payment practices, increasing workforce compensation, building the supply of child care, and expanding access to child care assistance. In addition to understanding how states are investing ARP Supplemental funds, OCC is collecting information on how much funding is allocated for each activity and whether states are experiencing challenges spending down funds. These questions represent a follow up collection to questions about supplemental funding asked to states in January through December 2023 (as previously approved under this umbrella generic).

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).

Information Collection Plan

OCC will ask staff in the 10 OCC regional offices to incorporate questions related to ARP Supplemental funding as part of their regular monthly calls with state Lead Agencies. These interview questions will begin in January 2024 (pending OMB approval) and last through December 2024 (12 months). Data will be collected from the CCDF Lead Agencies in 50 states, the District of Columbia, and Puerto Rico.

The new ARP Supplemental Funds Check-In Call Interview Questions are included in Attachment A.

3. Use of Improved Information Technology and Burden Reduction

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.

4. Efforts to Identify Duplication and Use of Similar Information

These questions are a follow up to a set of questions asked to state lead agencies about supplemental funding in January through December 2023 via a previous OMB approval. The information requested through the interview questions included in this request build on that previous data collection but does not duplicate the effort.

5. Impact on Small Businesses or Other Small Entities

No small organizations will be involved.

6. Consequences of Collecting the Information Less Frequently

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

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

This data collection requires monthly interviews with CCDF Lead Agencies. This cadence will ensure up-to-date and timely information ahead of the September 30, 2024, liquidation deadline for ARP Supplemental funds. Understanding spend down progress ahead of the liquidation deadline is critical to ACF's oversight and tracking of implementation progress. Despite this monthly cadence, this follow up data collection is a lower burden than the previous collection because of removal of interview questions resulting in a shorter interview.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

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 activity. 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.

9. Explanation of Any Payment or Gift to Respondents

No payment of gift is proposed for respondents of this information collection.

10. Assurance of Confidentiality Provided to 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.

11. Justification for Sensitive Questions

There are no sensitive questions in this data collection.

12. Estimates of Annualized Burden Hours and Costs

Information will be collected from the CCDF Lead Agencies in 50 states, DC, and Puerto Rico. These interviews will occur monthly over a 12-month period. The time per response is estimated to take approximately 10 minutes for the new ARP Supplemental Funds Check-In Call Interview Questions (Attachment A).

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total/ Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Child Care ARP Supplemental Funds Check-In Call Interview Questions (Attachment A)	52	12	0.167	104	\$40.00	\$4,160

Total Annual Cost

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2022, which is \$20.00 per hour. To account for the fringe benefits and overhead, the rate was multiplied by two for a total hourly wage of \$40.00. https://www.bls.gov/oes/current/oes211093.htm

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no additional costs to respondents.

14. Annualized Cost to the Federal Government

The annualized cost to the Federal Government 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) multiplied by \$30 per hour.

15. Explanation for Program Changes or Adjustments

This request is for a new data collection under the umbrella formative generic clearance for program support (0970-0531) to collect follow up data from respondents.

16. Plans for Tabulation and Publication and Project Time Schedule

OCC plans to begin collecting this information in January 2024 for 12 months, pending OMB approval.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

All instruments will display the expiration date for OMB approval.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.