



Transmitted via email: infocollection@acf.hhs.gov

March 23, 2026

Mary C. Jones, ACF/OPRE Certifying Officer
Mary E. Switzer Building
330 C Street, SW
Washington, DC 20201

Re: Proposed Information Collection Activity; Procedures for Requests From Tribal Lead Agencies To Use Child Care and Development Funds for Construction or Major Renovation of Child Care Facilities

Officer Jones,

On behalf of the Navajo Nation (“**Nation**”), we thank you for the opportunity to provide written comments in response to the Federal Registry Notice dated January 23, 2026, and titled: “**Proposed Information Collection Activity; Procedures for Requests From Tribal Lead Agencies To Use Child Care and Development Funds for Construction or Major Renovation of Child Care Facilities**”. We are particularly interested in this matter as we consider our children’s continued health and safety to be one of the greatest importance.

The Navajo Nation is the largest American Indian tribe in the United States, encompassing over 27,000 square miles (roughly the size of West Virginia) with portions of three states—Arizona, New Mexico, and Utah—spanning onto our lands. The Nation has over 420,000 citizens, half of whom reside on reservation land. In 1868, the United States entered into a treaty with the Navajo Nation, promising health care, education, agricultural assistance, and the improvement of the well-being of the Navajo people in perpetuity. As such, government-to-government consultation regarding matters such as data collection is essential to the United States meeting its treaty obligations.

The Navajo government administers early childhood and family services across our large, rural, and geographically dispersed tribal nation through our Navajo Division for Children and Family Services (“**NDCFS**”) and recognizes the importance of ensuring adequate infrastructure to support childcare access in tribal communities.

Necessity and Practical Utility of the Information Collection

The Navajo Nation recognizes that the information collection related to requests for the use of CCDF funds for construction or major innovation serves an important federal oversight function. Documentation regarding project scope, cost estimates, environmental compliance, and facility standards helps ensure that federally funded childcare facilities are safe, compliant with applicable regulations, and capable of recording high-quality early childhood services.

The Nation is also aware that for Tribal Lead Agencies serving rural and reservation communities, the ability to construct or renovate childcare facilities is essential. Many tribal communities face severe infrastructure gaps, including limited access to licensed childcare facilities and aging infrastructure that does not meet current safety or program standards. The information collection, therefore, has practical utility in allowing the Administration for Children and Families (“ACF”) to evaluate requests while supporting tribes in expanding childcare capacity.

However, we believe it is important that the process continues to account for the unique circumstances of tribal communities, including remote locations, limited contractor availability, and infrastructure challenges that can affect project timelines and costs.

Accuracy of the Estimated Burden

The proposed estimate of approximately 20 burden hours per response may underestimate the actual time required for a Tribal Lead Agency to prepare a complete submission. While the revised format may reduce administrative complexity, the process of gathering documentation, including architectural planning information, cost estimates, environmental compliance materials, and tribal approvals, often requires coordination across multiple departments and external partners.

For the Navajo Nation, additional time may be required to coordinate internal review, ensure alignment with tribal planning processes, and obtain leadership approvals. As a result, the total administrative burden may be higher than estimated, particularly for tribes managing projects in multiple service areas or across large geographic regions.

Quality, Utility, and Clarity of the Information to Be Collected

The Nation supports the Office of Child Care's efforts to improve the clarity and navigability of the information collection instruments. Clear instructions, standardized templates, and defined submission requirements will help Tribal Lead Agencies compile the required information more efficiently.

We suggest that in order to further improve quality and utility of the data, the Administration for Children and Families (“ACF”) consider the following: providing clear examples of acceptable documentation for construction and renovation requests, offering technical guidance or sample application material specifically designed for Tribal Lead Agencies, and ensuring that instructions reflect the realities of tribal governance processes and land status considerations, such as trust land approvals or tribal resolution requirements.

We believe that improved guidance will help ensure consistent submissions and reduce the need for follow-up clarifications between federal staff and tribal applicants.

Recommendations to Minimize Burden on Tribal Respondents

The following are our recommendations to help reduce administrative burden while maintaining accountability:

1. Electronic Submission Systems

Allow tribal lead agencies to submit requests and supporting documentation through a centralized electronic portal that allows document uploads, process tracking, and communication with federal staff.

2. Standardized Templates and Checklist

Provide standardized templates for construction proposals, cost estimates, and certification statements to simplify submission requirements.

3. Alignment with Existing CCDF Reporting

Where possible, align requested information with data already submitted through CCDF plans or grant reporting requirements to avoid duplication.

4. Technical Assistance for Tribal Lead Agencies

Offer technical assistance and pre-application consultation to help tribes navigate the process, particularly with first-time construction or renovation requests.

5. Recognition of Tribal Administrative Structures

Allow flexibility for documentation that reflects tribal governance processes, which may require additional attention.

The Navajo Nation supports the continuation of this information collection as a necessary component of federal oversight for CCDF construction and renovation projects. At the same time, we believe that it is essential that the process remains accessible and responsive to the unique operational realities of Tribal Lead Agencies serving large and rural tribal communities. By improving guidance, expanding electronic submission options, and recognizing tribal administrative processes, ACF can ensure that this information collection supports its intended purpose while minimizing administrative burden for tribes.

The Navajo Nation appreciates the opportunity to provide comments and looks forward to continuing its collaboration with the Administration for Children and Families to expand safe, accessible childcare infrastructure in tribal communities. Should you or your staff have any questions, please contact Mr. Thomas Cody, Executive Director of the Navajo Division for Children and Family Services, at (928) 871-6851 or via email at thomas.cody@ndcfs.org, or Vince Redhouse, Executive Director of the Navajo Nation Washington Office, at (202) 682-7390 or by email at vredhouse@nnwo.org. *Ahéhee'* (Thank you).

Respectfully,



Buu Nygren, *President*
THE NAVAJO NATION