

# **Child Care and Development Fund (CCDF) Information Technology Environment Scan**

**Formative Data Collections for Program Support**

**0970 – 0531**

## **Supporting Statement**

### **Part A - Justification**

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Submitted By:  
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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 for collecting information about data and information technology (IT) systems, including associated policies, practices, and funding, used by State and Territory Lead Agencies that receive Federal funding for the administration of the Child Care and Development Fund (CCDF) Program, generally referred to as Lead Agencies.

The information collected will be used to inform ACF of the types of training and technical assistance (T/TA) needed by Lead Agencies to improve data and IT systems, including associated Lead Agency guidance and processes. The results of the information collected will be used to baseline the current condition of data and IT systems and measure the effectiveness of the T/TA provided by the Data and Information Service Consultation Center (DISCC), an OCC contractor, to improve those data and IT systems over time.

### ***Background***

ACF is focused on improving accessibility and quality of child care for families and improving and simplifying administrative processes for child care providers. IT, including data and IT systems, plays a significant role in these goals, 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.

When data and IT systems are not integrated across these business processes, the experience for families and child care providers is compromised causing them to enter data multiple times, which causes data to become outdated across systems, and inhibits their ability to receive critical services that ensure the safety and quality of child care when needed. When data and IT systems are not integrated across processes, child care providers may become frustrated with the bureaucracy, which discourages them from participating in the CCDF Program. All of this may result in a poor experience for families and child care providers, but, most importantly, children suffer when high quality child care is not available.

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;
- Make enrollment easier and faster for families; and
- Increase clarity in CCDF requirements.”<sup>1</sup>

To comply with the 2024 CCDF Final Rule, most Lead Agencies will 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 challenges Lead Agencies may face so that OCC/DISCC can

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<sup>1</sup> [2024 Child Care and Development Fund \(CCDF\) Final Rule Fact Sheet | The Administration for Children and Families \(hhs.gov\)](https://www.hhs.gov/child-care/2024-ccdf-final-rule)

provide supportive T/TA, such as toolkits for developing an IT strategic plan, an IT strategic roadmap, and one or more IT project plans, as well as collaborating with Agencies to develop and implement these 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 information collected from Lead Agencies will be used by OCC/DISCC to identify T/TA opportunities that are of significant value to 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. Data will be aggregated across all or a subset of Lead Agencies (such as states, territories, regions, agencies with a specific organizational alignment or structure, etc.) to support CCDF programmatic needs. Various reports will be provided to enable each Lead Agency to understand their input compared with average inputs provided by other Lead Agencies. These reports will not allow any Lead Agency to discern the responses provided by another Lead Agency or allow them to rank Lead Agencies.

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.
- 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 a survey, referred to as the DISCC IT Environment Scan or scan, using Qualtrics, a commercial software tool hosted by ACF. Qualtrics enables Lead Agencies to receive an email with a link to the scan and provides Lead Agencies access to complete the scan online from a laptop, mobile device (e.g., smartphone), or combination of laptop and mobile device. Responses are not required, and respondents may provide all, or portions, of the information requested.

DISCC will provide webinars and materials to orient Lead Agencies and prepare them to complete the scan using the CCTAN/DISCC website. DISCC will use Microsoft Teams and Zoom to conduct webinars, host virtual office hours, and conduct meetings with groups of Lead Agencies, individual Lead Agencies, and individual respondents to address their questions about the scan. This webinar registration and feedback surveys are included as part of a separate request under the ACF Generic for Information Collections related to Gatherings (0970-0617; title: Data and Information System Consultation Center Universal Technical Assistance Surveys).

DISCC will use data analytics and visualization tools, such as Qualtrics, Excel, PowerBI, and Tableau, to develop reports and dashboards for the scan results.

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

DISCC will use Qualtrics, a commercial survey and analytics tool hosted by ACF, to conduct the CCDF IT Environment Scan. Qualtrics will permit Lead Agencies to respond online from a laptop, mobile device (e.g., smartphone), or combination of laptop and mobile device. The responses will be retained online in a database within the Qualtrics application. Data may be exported to additional data analytic and visualization tools, such as Excel, Power-BI, or Tableau, for more complex analysis and visualizations.

### **A4. Efforts to Identify Duplication**

The information to be collected by the CCDF IT Environment Scan does not exist currently. While isolated examples of the information sought may have been discovered, data was anecdotal and is 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 benchmark Lead Agencies and assess their needs for T/TA that will help them improve their data and IT systems. During the development of the approach and the questions to be included in the scan, DISCC met with other OCC TA centers to share drafts of the scan to enable centers to understand DISCC's information needs and held numerous conversations to understand information sources and shape the scan in a manner that is supportive of DISCC's needs without over burdening respondents<sup>2</sup>.

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<sup>2</sup> Through these efforts the same information was not requested of more than 9 individuals who were not federal employees and therefore these activities were not subject to the Paperwork Reduction Act.

## **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 scan.

## **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 Lead Agencies. OCC anticipates conducting a similar scan annually to be responsive to the evolving needs of Lead Agencies. While more frequent measures would be very useful to DISCC for assessing the effectiveness of the T/TA provided and would allow DISCC to more immediately alter its course of action, conducting the scan annually will still permit OCC/DISCC to adjust the types of T/TA provided as the needs of Lead Agencies change while minimizing burden. The annual cadence will be especially useful given the recently published 2024 CCDF Final Rule and the fact that many Lead Agencies may need to make changes to data and IT systems to comply with the new rule. The annual cycle gives Lead Agencies more time to plan, alter, and stabilize their data and IT systems before reassessing their progress and outcomes.

## **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 the expertise in the development of this information collection.

Additionally, during the development of the approach and the questions to be included in the scan, DISCC met with other OCC TA centers, including their contractors, to shape the scan and ensure appropriateness of questions for Lead Agencies<sup>3</sup>.

## **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 respondents 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 (PII) 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***

Estimated time to complete the DISCC IT Environment Scan is provided by Qualtrics based on the number and types of questions (e.g., multiple choice, standard scales, text, etc.). The estimated time to complete the scan is 44.7 minutes (approximately 0.75 hours). The scan is intended to be completed by the CCDF Program Administrator of the Lead Agencies in fifty (50) States, the District of Columbia (considered a State for this purpose), and five (5) Territories.

For this scan, DISCC estimates approximately 70% of the 50 State Lead Agencies (which includes the District of Columbia) will respond, or 36, and 80% of the 4 Territory Lead Agencies will respond. To support a high response rate, OCC Central and Regional Office staff, OCC TA Center staff, and ACF staff will assist DISCC to promote the DISCC IT Environment Scan.

DISCC anticipates that Administrators for Lead Agencies will want to engage with staff members to reflect the most accurate information possible when responding to various portions of the scan. DISCC estimates Administrators will engage an average of three (3) additional staff members to complete the scan. These staff members may be the IT Director/Manager, IT professionals, and staff who administer specific business functions within the CCDF Program. Administrators with larger programs may engage more than 3 staff members while Administrators with smaller programs may engage fewer than 3 staff

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<sup>3</sup> Through these efforts the same information was not requested of more than 9 individuals who were not federal employees and therefore these activities were not subject to the Paperwork Reduction Act.

members. These staff members are estimated to spend approximately 15 minutes, or .25 hour, each, assisting their Administrators.

**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](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
DISCC IT Environment Scan - Administrators	40	1	0.75	30	\$54.88	\$1,646.40
DISCC IT Environment Scan – Staff Members	120	1	0.25	30	\$54.88	\$1,646.40
Total Burden and Cost Estimates:				60	\$54.88	\$3,292.80

**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 \$17,000, including approximately 30 hours Federal labor to support review of the scan 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 release the DISCC IT Environment Scan on or about August 7, 2024, and is targeting to close the scan on or about September 19, 2024, providing approximately 30 work days for Lead Agencies to complete the scan. These dates may fluctuate based on the needs of the Lead Agencies. Just before releasing the scan, DISCC will conduct webinars to orient Lead Agencies to the scan. During the scan open period, DISCC will provide office hours and one-on-one assistance to respondents. DISCC plans to produce a quantitative analysis of results by September 30, 2024, and will provide a qualitative analysis of results in FY 2025.

DISCC plans to provide both quantitative reports and qualitative reports for each Lead Agency responding to the scan. The report will provide the respondent's input and the aggregate responses (average/mean, median, range) for peer respondents to enable each Lead Agency to understand their relative status within their peer group and establish target improvement measures. The reports will also be used to inform T/TA opportunities that can improve data and IT systems for Lead Agencies, especially considering the 2024 Final Rule and in alignment with state and territory child care plans that are due in July 2024.

**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. [REDACTED]

**Attachments**

Attachment A – CCDF IT Environment Scan 20240624