

# **Tribal Early Childhood Facilities Combined Application Guide**

**OMB Information Collection Request  
NEW**

## **Supporting Statement Part A - Justification**

**April 2024**

**Type of Request: New**

Submitted By:  
Office of Early Childhood Development  
Administration for Children and Families  
U.S. Department of Health and Human Services

## **1. Circumstances Making the Collection of Information Necessary**

Recipients of both the Tribal Child Care and Development Fund (CCDF) program and the American Indian and Alaska Native (AIAN) Head Start program can apply to use funding to construct or improve early childhood facilities in Tribal communities. Funding for facilities under the CCDF is authorized by Section 658O(c)(6) of the Child Care and Development Block Grant (CCDBG) Act, 42 U.S.C. § 9858(c)(6) and is managed by the Office of Child Care (OCC). Funding for Head Start facilities projects is authorized by 45 CFR Part 1303 (Subpart E) Head Start Program Performance Standards and is managed by the Office of Head Start (OHS). Application submission and review processes are currently unique to each respective funding stream. OHS and OCC have separate processes to collect applications for facility construction and major renovation from Tribal CCDF Lead Agencies and American Indian and Alaska Native (AIAN) Head Start programs (see OMB # 0970-0160 and 0970-0207) and these are reviewed and approved separately by OHS and OCC respectively.

The proposed information collection will provide instructions to Tribal CCDF Lead Agencies and AIAN Head Start programs on submitting joint plans for using both CCDF and Head Start funds to conduct facilities construction and major renovation projects that will enable the programs to better serve current AIAN families or increase enrollment currently limited by inadequate facilities. The Tribal Early Childhood Facilities Combined Application Guide will provide critical information and resources, so recipients understand the requirements of each program and develop plans that reflect the needs of their communities.

This guide streamlines the process for Tribal CCDF Lead Agencies and AIAN Head Start programs submitting collaborative, joint applications to use federal CCDF and Head Start funds for facilities projects where funds can be used for reasonable costs and fees related to planning for a facilities project, and to support the application development in Tribal communities. Reducing and streamlining administrative burdens for Tribal constituents follows policy priorities laid out in the 2022 HHS Equity Action Plan and is in alignment with Executive Order 14095 – Executive Order on Increasing Access to High-Quality Care and Supporting Caregivers. Additionally, this effort advances equity for individuals belonging to AIAN groups that have been historically underserved, marginalized, or subject to discrimination or systemic disadvantage, including those referenced in EO 13985 – Advancing Racial Equity and Support for Underserved Communities Through the Federal Government and the 2022 HHS Equity Action Plan.

## **2. Purpose and Use of the Information Collection**

The Tribal Early Childhood Facilities Combined Application Guide will streamline the process for Tribal CCDF Lead Agencies and AIAN Head Start programs to propose facilities projects to enable the programs to better serve current AIAN families, improve quality of services, and/or increase enrollment currently limited by inadequate facilities. The guide provides critical information and resources to recipients about the requirements of each program. Recipients will use the guide to develop plans that reflect the needs of their

communities and submit their plans to ACF for review and approval of use of both CCDF and Head Start funds to conduct facilities construction and major renovation projects.

ACF will use the information to inform approval decisions about proposed facilities construction and major renovation projects using both CCDF and Head Start funds. Additionally, ACF will use information from the plans received to monitor recipients when executing their projects and provide technical assistance.

**3. Use of Improved Information Technology and Burden Reduction**

This information collection permits electronic submission of responses. The use of information technology reduces financial burden and reaches more communities who are interested in participating in the information collection in their own time. The Tribal Early Childhood Facilities Combined Application Guide is accessible electronically through formal requests or through the Administration for Children and Families, Office of Early Childhood Development (ECD) webpage.

**4. Efforts to Identify Duplication and Use of Similar Information**

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

**5. Impact on Small Businesses or Other Small Entities**

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

**6. Consequences of Collecting the Information Less Frequently**

Without the information collection, ACF would be unable to support Tribal communities to successfully propose facilities activities using both Head Start and CCDF resources in one project. Tribes would have to apply separately through both programs' distinct and duplicative processes. Further, ACF would be unable to appropriately monitor implementation of these combined activities and ensure adherence to applicable guidance and regulation.

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

There are no special circumstances for this information collection relating to the Guidelines of 5 CFR 1320.5.

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

This information collection and the activities it supports have been informed by engagement of tribal communities, including notices inviting public comment, as well as feedback gathered from a tribal listening session.

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.

This notice was published on November 30, 2023, Volume 88, Number 229, page #83543, and provided a 60-day period for public comment. One comment was received during the 60-day comment period during a listening session hosted by ECD in collaboration with OHS and OCC on January 11, 2024. The listening session attendee asked: "How will the project be cost allocated between CCDF and OHS?" ECD made an edit to the guide in response to the comment by adding clarification that the cost allocation requirements should be in alignment with Uniform Guidance, 45 CFR § 75.

## **9. Explanation of Any Payment or Gift to Respondents**

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

## **10. Assurance of Confidentiality Provided to Respondents**

ACF will keep information private to the extent permitted by law. The guide provides detail regarding all potential uses of the information that is being collected. The only individual level data that is requested is contact information for the project leads in the Tribal community, which will be used for follow up.

## **11. Justification for Sensitive Questions**

There are no sensitive questions included in this collection effort.

## **12. Estimates of Annualized Burden Hours and Costs**

ACF estimates at most 10 applications per year. The time to review the guide, compile necessary information, develop the plan, and submit to ACF is expected to take up to 100 hours per application.

Information Collection Title	Annual Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Tribal Early Childhood Facilities Combined Application Guide	10	1	100	1,000	\$49.64	\$49,640

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for [Community and Social Service Specialists](#) [21-1099] and wage data from May 2022, which is \$24.82 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$49.64.

[https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm)

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

There are no other costs anticipated.

**14. Annualized Cost to the Federal Government**

We estimate the annualized cost to the federal government to be \$24,620. This is based on the following assumptions:

- a) Number of Total Annual Responses: 10
- b) Processing Time per Response: 40 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$61.55
- d) Cost to Process Each Response: \$2,462
- e) Total Cost to Process Response: \$24,620

**15. Explanation for Program Changes or Adjustments**

This is a new information collection.

**16. Plans for Tabulation and Publication and Project Time Schedule**

The results of this information collection will not be published. The final version of the guide will be made accessible to recipients as soon as OMB approval is received, and recipients may then submit a plan and request for funding as needed.

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

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

## **18. Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions are necessary for this information collection.