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February 21, 2012

Office of Management and Budget
Attn: Desk Officer for the Administration for Children and Families
725 17th Street, N.W.
Washington, DC 20503

To Whom It May Concern:

On behalf of the American Public Human Services Association (APHSA) and the National Association of State Child Care Administrators (NASCCA), we respectfully submit comments in response to the *Federal Register* notice (Vol. 77, No. 18) regarding the second round of proposed changes to the *Child Care Quarterly Case Record Report*, also known as the ACF 801 Form.

We thank you for reviewing our previous comments letter regarding the first round of proposed changes to this document. We recognize that the Office of Child Care (OCC) has taken into consideration several of the recommendations that state child care administrators have requested and appreciate your willingness to offer technical assistance and guidance on implementing the new data elements. NASCCA members also appreciate the OCC providing states with clarity on some of the proposed changes (re: December 20, 2011 e-mail from OCC Director Shannon Rudisill to Child Care Development Fund Lead Agency Administrators). In order to ensure successful implementation in states, we believe additional guidance will be needed and should be provided through the new technical assistance centers. We also look forward to working with the OCC more closely to promote program integrity and ensure that accurate data from states are collected effectively and efficiently.

In our first letter, we mentioned that many states have expressed concerns that these new data elements could present potential challenges, especially when attempting to make modifications to their state systems. States will be challenged in both (1) meeting the proposed timeline requiring full implementation of the new data elements by October 2013 and (2) finding the resources to fund the required system changes, particularly given the tough budget constraints that states continue to operate under. States working with outdated data collection systems will have the hardest time meeting these requirements, especially when additional funds from the federal government have not been offered. Other feedback and recommendations include the following:

FEIN/Unique State Provider ID

We recognize that changes have been presented in the second version of the ACF 801 form for states to successfully implement new data elements involving a federal identifier number and a unique state provider ID. According to the form, states have the option of choosing an FEIN or a unique state identifier and can determine which item would be more applicable for their system. Children's social security numbers can also be used in the data submission in absence of a provider ID. State child care administrators appreciate the flexibility to submit alternative responses to indicate various forms of provider IDs and indicate those that are location specific. This change would help address the unique needs of the state, and would allow states to clarify if they use the same provider for multiple locations. This will particularly assist county-administered states that have multiple ways of assigning

provider IDs. However, for the purpose of ensuring accuracy and validity when calculating this data, it is essential for the OCC to consider a more streamlined process for collecting these data from states in the future. We look forward to working with the Administration for Children and Families (ACF) on ways to improve this process and are working on specific recommendations for the ACF to consider.

In addition, while states are in various stages of modifying their systems to include a federal identifier or a unique provider ID number, it is important to note that financing these changes will become a huge barrier. APHSA and NASCCA's letter to the OCC on the first round of draft changes to the ACF 801 Form mentioned that implementing this particular change would have a negative fiscal impact for states that do not use a FEIN or unique state identifier. There is a strong possibility that some of these states will not be able to meet the required timeline for the new data sets to be fully implemented.

Total Hours of Care

States support the revised language to this item and the clarity that was provided in the second version of the draft form. These changes will allow states to report more than one way that these hours are captured and calculated. According to the second round of revisions, states also have the option of reporting "actual" or "authorized" hours of care. Such revisions will allow states to accurately report the total hours of care provided in a month. However, we recommend the OCC implement a method for states to submit these data annually and not monthly.

QRIS Participation

State administrators appreciate the revisions in the second draft of the ACF 801 form related to QRIS participation. NASCCA members believe that providing data on child care providers' QRIS participation is extremely important. We hope that this will result in educating state and federal policymakers about the importance of high-quality child care, opening new doors to improve how child outcomes are tracked and promoting awareness about the importance of provider participation in QRIS.

State or Local Pre-K Standards

State child care administrators request clarification or a definition of these standards. Many states have reported that such standards are defined by their state's education agency. This could create a challenge for states to report such data without this clarity. In addition, it is important for the OCC to keep in mind that these standards might be interpreted differently by every school district within a state or locality. Although states have the option of reporting these data on the ACF 801 form, it is important for the OCC to be clear on the information the agency is interested in collecting. We also recommend that the OCC consider working with the Department of Education on this item.

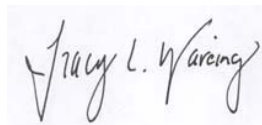
We recommend that the OCC consider:

- Using the Center on Child Care Data and Technology within the new technical assistance centers to work with states and regions on implementing these new data elements.
- Extending the timeline for submitting data on new elements.
- Offering additional funding opportunities or creating a demonstration grant project for states to modify their current systems or develop a new technical infrastructure designed to help states comply with federal data reporting requirements.
- Developing a program instruction or guidance on implementation of the new data elements.

We recognize that improving health and human service programs is a shared responsibility grounded in a federal-state partnership that is most productive when it is balanced with state flexibility, reasonable federal oversight, and adequate resources to improved programs. In that spirit, we look forward to working with you on these proposed changes and offering additional recommendations for a more streamlined process for collecting quality data.

Please do not hesitate to contact Rashida Brown at (202) 682-0100 x225 or rashida.brown@aphsa.org if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink that reads "Tracy L. Wareing". The signature is fluid and cursive, with the first name "Tracy" being more prominent.

Tracy L. Wareing
Executive Director
APHSa

A handwritten signature in blue ink that reads "Linda Saterfield". The signature is cursive and elegant, with the last name "Saterfield" being the most distinct part.

Linda Saterfield
Chair
NASCCA