



MEETING CCDF FEDERAL REPORTING REQUIREMENTS

Background

As part of the requirements associated with receiving CCDF funds, grantees must regularly submit data to the Office of Child Care (OCC). The *Child Care and Development Block Grant Act of 2014* requires that grantees report two additional data elements:

- Homelessness - whether the children receiving assistance are homeless;
- Fatalities – the number of child fatalities occurring among children while in the care and facility of child care providers receiving assistance.

States and Territories, at a minimum, must continue to provide the following information to OCC about the families and children they serve¹:

- family income;
- county of residence;
- gender, ethnicity, race, and age of children receiving assistance;
- whether the head of the family unit is a single parent;
- the sources of family income, including: employment, including self-employment; cash or other assistance (TANF); housing assistance; assistance under the Food Stamp Act of 1977; and other assistance programs;
- the number of months the family has received benefits;
- the type of child care in which the child was enrolled;
- whether the provider involved was a relative;
- the cost of child care for families;
- the average hours per month;
- the number of child care providers that received funding;
- the monthly cost of child care services, and the portion of costs that is paid for with assistance, listed by the type of provider;
- the number of payments made by the State through vouchers, contracts, cash, and disregards under public benefit programs, listed by the type of provider;
- the manner in which consumer education information was provided to parents and the number of parents to whom such information was provided;
- the total number (without duplication) of children and families served during the report period;

The OCC may also require additional information to meet other Federal information needs. In order for OCC to meet its reporting requirements to Congress, they have developed guidelines

¹ CCDBG Act 658K(a)(1-2)

that state specifically what information grantees must capture and report, and the format in which that information must be provided.

Discussion Questions:

The list of questions below is intended to serve as a discussion guide as grantees develop a data-related action plan for meeting reporting requirements and ensuring continued compliance. This list is not exhaustive, and all questions may not apply to all grantees, but hopefully they will serve as a tool when designing and implementing changes to data management policies and procedures.

Does the State understand the CCDF data and reporting requirements?

- Does the CCDF team understand the reporting requirements?
- What questions about the reporting guidance need to be resolved even before beginning the process of planning for changes to data management and reporting policies/procedures?

Is the State currently capturing all of the required data in the correct format?

If no, or unsure, consider the following questions:

- How will the State find out which, if any, of the required data are available?
- How difficult will it be to begin capturing the data? Who should be responsible for collecting the information?
- What resistance might be encountered in meeting this requirement?
- Who are the other stakeholders or key players that need to be at the table?
- Who has the authority to ensure that the State does what is needed to remain in compliance?
- What are the fiscal issues that may be encountered?
- What are the system issues to be resolved?
- For additional help, is there a procedure in place to find out how other grantees are meeting the requirement?
- Is there a mentor State(s) with a similar IT system that the State can discuss best practices for defining, collecting, and reporting the data?

If yes, consider the following questions:

- Does the Child Care program currently directly collect the new data elements? If not, who/which department in the State does collect the information?
- Is the existing information being collected in a format that will meet the new CCDF requirements? If the format isn't exact, can it still be used?
- Is the "owner" of the data willing to make changes to bring it into compliance with CCDF requirements?
- If the information is being captured in multiple places, which of the data sources captures the best measure for meeting CCDF requirements? How will the best option be determined?

- Does a Memorandum of Understanding (MOU) have to be in place with different departments or agencies to facilitate access to, and use of, the data?

What are the systems issues or concerns to be considered?

- Is the required information in the Child Care data system or another system?
- What type of data system currently stores the information (State-wide integrated or program dedicated)?
- What about the IT system may make it easier or more difficult to make changes?
- Will a contractor or an internal development team be used? To whom does the IT team report?
- What is the State's process for implementing system changes?
- Where does the child care program fit in the priority of IT development needs when there is a shared IT support group?
- Who has the authority to direct that changes be made to the system and/or extraction code to ensure continuing compliance with the CCDF law?
- How quickly can system changes be made? Can the process be expedited, and if so, how?
- Will modifying the system and/or extraction code for the required reporting impact any other system or program?
- Do the data need extra manipulation in order meet the reporting requirement? If so, what needs to happen?

How can the State assure the quality of the new information?

- What testing/quality assurance (QA) protocol is in place to assure accuracy when making changes to a system?
- Who is responsible for reviewing the system output data to ensure accuracy and completeness?
- What ongoing QA processes are used to monitor continuing compliance with regulations?

Existing Resources:

A NCDT Technical Assistance Specialist will be present at the State and Territory Administrators Meeting (STAM 2015) to answer questions as you begin thinking about data reporting changes associated with the new reauthorization requirements.

The OCC has several Technical Bulletins which offer guidance and clarifications on the Federal reporting requirements as well as how to format and transmit required reports, located on their web site. They are available here: <http://www.acf.hhs.gov/programs/occ/resource/current-technical-bulletins>.