

Using Administrative Data to Answer and Inform Program and Policy Decisions

OMB Information Collection Request

0970-0356

Supporting Statement

Part A

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A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval to conduct phone interviews with Child Care and Development Fund (CCDF) administrators. This activity is planned as part of a larger project that is exploring ways to increase and improve states' analysis of administrative data, or data that are regularly collected as part of administering programs, to address child care policy-relevant research questions. Issues related to use of administrative data for research and evaluation are not unique to child care policy, and the project is compiling relevant resources from related fields. However, OPRE requires information regarding the specific needs and capacities of CCDF administrators and child care subsidy agencies to inform decisions regarding this research project and future child care research planning. The information collected will be used for internal purposes only. Permission to collect information for this limited purpose is requested under ACF's generic clearance for Formative Data Collection for Informing Policy Research (OMB Number 0970-0356).

Study Background

Since 1995, ACF has provided grant funding to support research on child care policy issues conducted by, or in partnership with, the state agencies that administer CCDF programs. Given limited resources at all levels of government, the analysis of administrative data can be an attractive option: Because the data are collected as part of regular program operations, they would be collected regardless of whether any research or evaluation projects were conducted, and research costs are greatly reduced. For the first time, ACF recently awarded grants to two state CCDF lead agencies to support rigorous, policy-relevant research that primarily involves the analysis of child care administrative data. However, little is known, beyond anecdotal information, regarding whether and how most state CCDF administrators have used, or may want to use, administrative data, the barriers to using administrative data, or the resources that would support state CCDF administrators in using a range of early childhood administrative datasets to address policy questions of importance to them.

The Child Care Administrative Data Analysis Center (CCADAC) is exploring ways to increase and improve states' analysis of administrative data to address child care policy-relevant research questions. The project is informed by needs assessment and capacity building projects recently conducted in related areas, such as OPRE's Family Self-Sufficiency Research Data Center and the Department of Education's Center for IDEA Early Childhood Data Systems. A key component of the CCADAC is to uncover critical information about CCDF administrators' use of administrative data and the barriers they have encountered when trying to use administrative data. This information will be used to inform the compilation or development of resources that can support CCDF administrators' analysis of administrative data to address child care policy-relevant questions. OPRE will also use this information to inform future child care research planning.

Legal or Administrative Requirements that Necessitate the Collection

There are no legal requirements for this data collection.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Approach

The information collected under this clearance will be used to help OPRE make decisions about the development of research-based resources that would be most helpful to states to increase their appropriate analysis of administrative data to answer policy-related questions in their state. We plan to conduct phone interviews with state CCDF administrators starting shortly after receiving OMB approval and completing the interviews within three months. Phone interviews allow for the collection of in-depth information and follow-up questions for clarification regarding states' use of early childhood administrative data.

Research Questions

This research study is designed to address three main research questions:

1. How are states currently using their administrative data? And how might states want to use their data in the future?
2. What barriers do states face when trying to analyze administrative data?
3. What resources or supports can states identify that would help them to use administrative data to answer policy-related questions?

Study Design

All state CCDF administrators from the states and territories will be invited to participate in this study. CCDF administrators are the population of interest because of their responsibility for administering federally-funded child care programs, their leadership role in state early childhood systems, their oversight of several child care datasets (e.g., subsidy), and their likely involvement in early childhood research projects to analyze administrative data. The study aims to obtain data from the entire population, not a sample. If response rates are high, the findings should be generalizable to the population of CCDF administrators.

We will conduct one phone interview with each participant to obtain the information. The questions are a combination of yes/no and open-ended questions. The analysis of the qualitative phone interview data will be summarized in a memo for OPRE's internal use. All information collected is for internal use only and will be used solely to inform the development of research-based resources and OPRE's research planning.

The interview methodology is a strength of the study. The interview will allow the team to gather more in-depth information and will provide the participants an opportunity to report relevant information about the topic that was not directly addressed in a particular interview question. Other strengths of the study are the inclusion of the entire population (rather than a sample) of interest and the use of experts in developing the interview protocol.

The reliance primarily on the state CCDF administrator is a limitation of this study. Their knowledge of and experience with administrative data will depend, in part, on their years in the

role of CCDF administrator. This study will not be able to capture the perspectives from multiple early childhood leaders who work with administrative data in states. If the CCDF administrator requests, the contractor will interview another staff member of the agency along with or instead of the CCDF administrator, but this approach will still limit the perspectives captured in this study. (The knowledgeable staff will vary across states. Some, but not all, CCDF administrators may have a researcher on staff who could answer the questions. We will not be able to identify these other individuals without communicating first with the CCDF administrators.) Although the restricted participants is a limitation to acknowledge, it is also important to note that the CCDF administrator is the primary target audience for any research-based resources developed by OPRE. The perspective and opinions of the CCDF administrators, even if incomplete, will provide the most accurate representation of the current behavior and needs of this population in using administrative data.

Universe of Data Collection Efforts

The universe of data collection efforts includes one interview protocol (State Child Care Administrator Interview about Using Administrative Data to Answer and Inform Program and Policy Decisions, see Appendix A), which will be administered to all participants. The interview protocol includes a series of questions to understand more about how the particular state may be using administrative data, ways that the state may want to use administrative data in the future, as well as barriers and supports in using administrative data. The questions for the interview protocol are newly developed.

A3. Improved Information Technology to Reduce Burden

Whenever possible, advanced technology will be used to collect and process data to reduce respondent burden and make data processing and reporting more timely and efficient. A digital audio recorder will be used in all interviews, so that respondents will be able to speak without having the interviewer interrupt or slow them down to take notes. (Participants' verbal consent to be audio recorded will be obtained before turning on the audio recorder.) To reduce participant travel burden, we will recruit and communicate with all participants through email or by phone (See Appendix B, C, D, E, G, and H for recruitment scripts), and we will conduct all of the interviews via telephone. We will send participants materials via email when possible. We will also email a reminder with the date and time of the phone interview unless participants indicate a preference to receive this information in another format. (See Appendix F for a copy of the email reminder).

A4. Efforts to Identify Duplication

Every effort has been made to determine whether similar studies exist by searching various databases (e.g., national and scholarly) and consulting with experts in the field. While our review of extant literature uncovered articles and reports regarding the use of administrative data for research or to inform policy, there was no national information about the current use of administrative data by state CCDF administrators and their staff, the barriers they faced, or the supports states and territories would need for future uses of administrative data to inform policy. We have also consulted with experts in the field, and they concur that the field lacks a summary of the needs of CCDF administrators in analyzing administrative data.

A5. Involvement of Small Organizations

We will only collect data from one administrator from each state or territory. Although these administrators are in agencies that are not considered small businesses/entities, we will attempt to reduce the impact on them by conducting phone interviews on days and at times that are convenient to them. This will help to ensure that administrator participation does not conflict with their other responsibilities. Also, the impact, if any, on small businesses or other small entities will be reduced by the voluntary nature of the data collection

A6. Consequences of Less Frequent Data Collection

This is a one-time data collection; participants will only be asked to volunteer for a single phone interview.

A7. Special Circumstances

There are no special circumstances for this data collection.

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 the generic clearance for information collection. This notice was published on June 10, 2011, Volume 76, page 34078, and provided a sixty-day period for public comment. The second notice was published on August 29, 2011, Volume 76, page 53682, and provided a thirty-day period for public comment. ACF did not receive any comments.

Consultation with Experts Outside of the Study

The project has benefitted and will continue to benefit from consultation with experts who serve on an expert panel to provide guidance on this project and the later development of research-based resources. The experts have reviewed previous versions of the interview protocol and believe the current version will be understood by CCDF administrators and will elicit the desired information about uses, barriers, and possible supports. Experts include:

- Elizabeth Davis, University of Minnesota
- Linda Giannarelli, The Urban Institute
- Fran Kipnis, The Center for the Study of Child Care Employment at UC Berkeley
- Gretchen Kirby, Mathematica Policy Research
- Roberta Weber, Oregon State University

A9. Incentives for Respondents

No incentives for respondents are proposed for this study.

A10. Privacy of Respondents

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law. This project falls outside of IRB requirements because the project does not constitute research (i.e., the information gathered will not develop or contribute to generalizable knowledge).

As specified in the contract, the Contractor shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. The Contractor has developed and implemented a Data Security Policy to protect respondents' personally identifiable information. The Contractor shall ensure that all of its employees, subcontractors (at all tiers), and employees of each subcontractor, who perform work under this contract/subcontract are trained on data privacy issues and comply with the above requirements.

As noted in Section A11, there is no sensitive information collected in this study.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Newly Requested Information Collections

The total hours for this data collection activity is estimated to be 56 hours, including time for recruitment, scheduling, and participation in the interview.

Total Burden Requested Under this Information Collection

The proposed information collection does not impose a financial burden on respondents. Respondents will not incur any expenses other than the time spent in conversation with the contractor. We will invite 56 Child Care and Development Fund (CCDF) administrators to participate in the interview: the CCDF administrator in each of the 50 states plus Washington, DC as well as the CCDF administrator in 5 U.S. territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and Virgin Islands).

Instrument	Total Number of Respondents	Annual Number of Respondents ¹	Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
State administrator protocol	56	19	1	1.5	28.5	\$32.61	\$929.39
Estimated Annual Burden Sub-total					28.5		\$929.39

¹ Annualized over the 3 year clearance period of the overarching generic clearance.

Total Annual Cost

For state administrators, an average hourly salary of approximately \$32.61 is assumed based on the Bureau of Labor Statistics (BLS) estimates for median hourly wages for management and professional state and local government workers². There will be no direct cost to the respondents other than their time to participate in the study.

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 estimated cost to the Federal Government for the data collection activities under this current request will be \$43,150. This includes personnel effort (45 hours for a Class I Senior staff, 126 hours for a Class II Associate, and 205 hours for a Class IV Junior staff) plus other direct costs and indirect costs.

A15. Change in Burden

No program changes are expected.

A16. Plan and Time Schedule for Information Collection, Tabulation and Publication

The timeline for the project is provided in the chart below. The recruitment process could take anywhere from a day to a week and a half to complete per CCDF administrator. As a part of the recruitment process, an initial email will be sent to CCDF administrators to ask about their interest. If they do not respond to that email, a second email will be sent a week later. If they still do not respond to the second email in a few days, a follow-up call will occur. If the administrator still does not respond after the follow-up call, an email will be sent to ask for an alternate participant. See Appendices B-H for email texts and phone scripts used for recruitment and scheduling.

Analysis of the data will include the identification of themes from open-ended responses as well as basic summary information for any quantitative questions (e.g., yes/no questions). Two members of the research team will independently review all qualitative responses. There will not be a public report of the findings, and the findings will not be discussed publicly.

	2014											
	1	2	3	4	5	6	7	8	9	10	11	12
Conduct interviews												
Analyze interview data												
Summarize results in a memo for OPRE												

A17. Reasons Not to Display OMB Expiration Date

² U. S. Department of Labor, Bureau of Labor Statistics “National Compensation Survey: Table 1: Summary Mean hourly earnings and weekly hours for selected workers and establishment characteristics.” 2010. <http://www.bls.gov/ncs/ocs/sp/nctb1344.pdf>.

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.