

# **Building Capacity to Use Linked Early Childhood Administrative Data for Program Improvement and Broader Research Initiatives (BCULD)**

ASPE Generic Information Collection Request  
OMB No. 0990-0421

## **Supporting Statement – Section A**

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### **Program Official/Project Officer**

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## Section A – Justification

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

#### Background

The federal government spends significant resources every year on program funding streams that support early care and education (ECE) and child development. The ability to examine early childhood program investments, facilitate continuous program improvement, understand participation in and exposure to ECE programs, and better target services can be greatly enhanced if there is infrastructure in place to use existing administrative data to better understand program characteristics, child characteristics, program participation, and short- and long-term child outcomes across a variety of domains. Administrative data from ECE programs (some of which is already collected; e.g., program attendance, developmental assessments) that is linked to existing K-12 education data and other data systems can be used to identify program, caregiver, family, and child characteristics that are associated with long-term outcomes for children. Such information can help to improve the use of data for continuous quality improvement; build the evidence base regarding successful features of programs, including areas for program improvement or emphasis; and develop a better understanding of how current public investments are faring on an ongoing basis.

There are already several on-going federally-funded efforts to create better access to ECE administrative data (particularly at the state level) through investments in building early childhood integrated data systems (ECIDS). For states with advanced ECIDS, these systems will often include data from: the Child Care and Development Fund (CCDF); state-funded preschool programs; early intervention programs funded through the Individuals with Disabilities Education Act Part B and Part C (IDEA); K-12 education; and possibly other service systems such as child welfare and public health. However, Head Start, a large federally administered ECE program that serves low-income children and families, has often not been as well-represented in local or state ECE data integration efforts. This may be due to several barriers and challenges that likely exist in sharing and linking Head Start administrative data, including legal, scientific, and technical challenges, as well as the different funding structure for Head Start as compared to other federal- or state-funded ECE programs. Additionally, little is known about examples where Head Start programs have successfully linked data with other programs, and how this was accomplished (i.e., lessons learned).

Therefore, in FY 2014, the Office of the Assistant Secretary for Planning and Evaluation (ASPE), in partnership with the Office of Planning, Research and Evaluation (OPRE), funded a new project, *Building Capacity to Use Linked Early Childhood Administrative Data for Program Improvement and Broader Research Initiatives (BCULD)*. The objectives of this project are to: (1) examine opportunities and challenges in linking Head Start and other ECE administrative data, as well as using these linked data, to support continuous program improvement in ECE settings, (2) develop resources that can support the linking of Head

Start administrative data with other data systems (e.g., child care, state-funded pre-kindergarten, K-12 public schools, health, child welfare, etc.), and (3) examine the “readiness” of a select small number of Head Start grantees to engage in data linking efforts.

This project is building on (and not duplicating) other federal and non-federal efforts focused on promoting the better use of administrative data and data linkages across early childhood and other administrative data systems, both vertically and horizontally (e.g., the Department of Education’s State Longitudinal Data Systems grant program; the INQUIRE Data Dictionary and Toolkit supported by the Administration for Children and Families). The project is placing a particular emphasis on the perspective of local programs (as opposed to states), including barriers and challenges they face, as well as examples of successes. There is also a particular emphasis on Head Start administrative data, since (as noted above) Head Start has often not been as well-represented in ECE data integration efforts. This may be due to several barriers and challenges that likely exist in sharing and linking Head Start administrative data, including legal, scientific, and technical challenges, as well as the different funding structure for Head Start as compared to other federal- or state-funded ECE programs.

The project is seeking to answer four main research questions, listed below:

1. *Challenges and Opportunities around Linking ECE Administrative Data.* To what degree are ECE programs (particularly Head Start) currently linking their administrative data vertically and horizontally, and using these linked data for continuous program improvement purposes? What challenges and barriers exist around linking Head Start and other ECE data longitudinally with K-12 education data or horizontally with other relevant data systems, and how have such challenges been overcome?
2. *Primary Questions of Interest that can be addressed with Linked Administrative Data.* What questions are of interest to Head Start grantees, Child Care administrators, local education partners, policymakers, researchers, and other key stakeholders that could be appropriately explored using linked administrative data? How could answers to such questions help support continuous improvement and learning for the Head Start, ECE, education, and policy research communities?
3. *Resources Needed to Build Capacity to Link Early Childhood Data.* What tools and resources (e.g., guidance on analysis planning, technical procedures, or appropriate data elements; templates for data sharing agreements; etc.) could be developed that would be useful for building the capacity of ECE programs to link their administrative data and use linked data (particularly Head Start) for program improvement and research purposes?
4. *Readiness of Head Start Grantees to Link Data.* What criteria can be developed to examine whether Head Start grantees and other ECE programs are “ready” to link and use linked administrative data? Using these criteria as a measure, how well prepared are Head Start grantees to engage in data linking efforts?

Findings from the proposed data collection described in this Generic Information Collection package will primarily address questions #2 and #3 above.

This data collection is being conducted using the Generic Information Collection mechanism in the Office of the Assistant Secretary for Planning and Evaluation (ASPE) – OMB No. 0990-0421. The respondent universe for this data collection aligns with that of the OSC. Data will be collected from directors and staff of Head Start programs, as well as technical assistance partners and representatives of national or state organizations, acting in their official capacities.

This data collection is authorized by Section 301 of the Public Health Service Act (42 U.S.C. 241).

### **Privacy Impact Assessment**

Overview of the Data Collection System – The data collection will be conducted through a large group discussion during a session at a research conference. The large group discussion will be held at the National Head Start Association’s (NHSA) *42<sup>nd</sup> Annual Head Start Conference and Expo* taking place in Washington DC on March 31, 2015. The session will be structured in a way where the session facilitator will pose open-ended questions to the session attendees, and session attendees will be invited to respond. Session attendees may also be broken up into smaller groups to brainstorm on their responses, and then report out to the larger group later in the session. Attendance at the session (and subsequent voicing of response from attendees) will be completely voluntary. The questions to be posed by the facilitator during the large group discussion have been developed and revised prior to the session (see Attachment A). The discussion questions were developed by ASPE’s contractor for this work, Child Trends, in consultation with the ASPE federal project officers. Child Trends staff will also facilitate the large group discussion, with the two ASPE federal project officers attending to take notes and assist as needed. Hard copies of the questions will also be distributed in person at the session, so that attendees can jot down their thoughts in writing, if this is preferable over voicing their thoughts out loud during the session. The hard copies will not request any personally identifiable information.

The findings from the large group discussion will not be generalizable. The method of data collection was chosen due to the exploratory nature of this inquiry. Through the large group discussion, the federal contractor will be able to collect nuanced and detailed information about the on-the-ground experiences and challenges of ECE program directors and partners that will help to inform the work and goals of this project.

No personally identifiable information will be collected.

### Items of Information to be Collected –

- No personally identifiable information will be collected.

- How programs use data, including whether they have identified staff to oversee this work, and whether data are used for program improvement purposes.
- How programs store and manage data related to children, families, staff and services, including whether they use a data management system and whether children and staff have unique identifiers.
- Whether programs link data with data from other programs/sources, and how they use this information, including what questions they are able to answer using these linked data.
- What resources and support programs need in order to better link and share their data.
- Whether programs have data sharing agreements or written documents describing how data can (and cannot) be used, as well as how they protect the privacy of data.
- The degree to which programs value linked and shared data to inform decision-making or program improvements.
- Program director perspectives on what needs to be in place in order to be “ready” to share data.

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

There are already several on-going federally-funded efforts to create better access to ECE administrative data (particularly at the state level) through investments in building early childhood integrated data systems (ECIDS). However, Head Start, a large federally administered ECE program that serves low-income children and families, has often not been as well-represented in local or state ECE data integration efforts. Therefore, in FY 2014, ASPE, in partnership with ACF/OPRE, funded a new project, *Building Capacity to Use Linked Early Childhood Administrative Data for Program Improvement and Broader Research Initiatives (BCULD)*. The objectives of this project are to: (1) examine opportunities and challenges in linking Head Start and other ECE administrative data, as well as using these linked data, to support continuous program improvement in ECE settings, (2) develop resources that can support the linking of Head Start administrative data with other data systems (e.g., child care, state-funded pre-kindergarten, K-12 public schools, health, child welfare, etc.), and (3) examine the “readiness” of a select small number of Head Start grantees to engage in data linking efforts.

The current Generic Information Collection request will address objectives #1 and #2 above. Data collection will be conducted through a large group discussion during a session at a research conference. The large group discussion will be held at the NHSA’s 42<sup>nd</sup> *Annual Head Start Conference and Expo* taking place in Washington DC on March 31, 2015. The session will be structured in a way where the session facilitator will pose open-ended questions to the session attendees, and session attendees will be invited to respond. Session attendees may also be broken up into smaller groups to brainstorm on their responses, and then report out to the larger group later in the session. Attendance at the session (and subsequent voicing of response from attendees) will be completely voluntary.

Child Trends staff will also facilitate the large group discussion, with the two ASPE federal project officers attending to take notes and assist as needed. Hard copies of the questions will also be distributed in person at the session, so that attendees can jot down their thoughts in writing, if this is preferable over voicing their thoughts out loud during the session. The hard copies will not request any personally identifiable information.

Information gathered from the large group discussion will inform the work of the current project, including challenges ECE programs face in linking administrative, the current status of administrative data linkages across ECE programs, and what resources might be useful to support programs' efforts to link administrative data. While some exploratory research in this area has been done, particularly from the perspective of states, the questions and topics addressed in this data collection will uniquely focus on program-level efforts to link data, as well as the challenges and opportunities that programs face in linking data – issues that have not yet been explored. Additionally, the current data collection will focus on Head Start programs, a population for which little is known about how programs are linking data, and what might be needed to help them in these efforts.

The information will be used to inform the development of products and resources that will support ECE programs in linking and using their administrative data for continuous program improvement. These resources will also build on existing tools and literature related to this topic, but would lack key informant information from the program and on-the-ground perspective of stakeholders without this data collection.

#### Privacy Impact Assessment

All information or data collected will be kept secure and will be used only to inform the overall findings of the project. No personally identifiable information will be collected.

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

Data will be collected via an in-person large group discussion at a conference. Potential respondents already plan to attend the larger conference. Therefore, the sample for this data collection will be a sample of convenience. This method was chosen to reduce the overall burden on respondents and to gather as many perspectives as possible in the shortest amount of total time.

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

Over the past two years, ASPE staff has scanned the literature and met with experts in the field to seek and understand existing efforts, resources, and reports related to linking Head Start and ECE administrative data, particularly around linking such data into state-level data systems. ASPE's contractor for this work, Child Trends, has further done a scan of the field to locate any resources designed to support local Head Start programs in data sharing efforts. Additionally, ASPE is partnering with the leading experts in the field of early

childhood data to ensure the work of this project builds on the existing knowledge base. This includes federal partners from across the Department of Health and Human Services and the Department of Education.

This data collection will build on information gathered in separate research efforts, but will not duplicate past work. For example, the Early Childhood Data Collaborative has surveyed state administrators to identify progress in the development of statewide early childhood integrated data systems, and ACF has also surveyed Head Start programs about their use of their *own* data internally for continuous program improvement efforts. This proposed data collection builds on these separate exploratory research efforts by specifically focusing in on how ECE programs are linking their data with other data systems (e.g. SLDS, other ECE programs, K-12 programs) to support continuous program improvement efforts. This study will uniquely focus on program-level experiences with linking and sharing data (and challenges faced in this work), as opposed to state-level data system development or programs' use of their *own* data that is not linked to other sources.

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

No small businesses will be involved in this data collection.

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

This request is for a one time data collection. There are no legal obstacles to reduce the burden. Without this information, the Department of Health and Human Services would have:

- Very limited on-the-ground information about the challenges and opportunities that programs face when linking administrative data and using linked data for program improvement purposes;
- Very limited on-the-ground information regarding successes in linking data;
- A very limited sample from which to gather a wide range of perspectives on these issues; would instead have to rely on a very limited range of program-level experiences.

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

There are no special circumstances with this information collection package. This request fully complies with the regulation 5 CFR 1320.5 and will be voluntary.

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

This data collection is being conducted using the Generic Information Collection mechanism through ASPE – OMB No. 0990-0421.

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

ASPE will not provide payments or gifts to respondents.

### 10. Assurance of Confidentiality Provided to Respondents

The Privacy Act does not apply to this data collection. ECE program directors, staff, and association members will be speaking from their official roles and will not be asked about, nor will they provide, individually identifiable information.

This data collection is not research involving human subjects.

### 11. Justification for Sensitive Questions

No information will be collected that are of personal or sensitive nature.

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

The estimate for burden hours is based on a 60-90 minute large group discussion with up to 100 participating individuals, primarily from Head Start programs, technical assistance providers that work with Head Start programs, and staff of membership associations for ECE providers (such as the National Head Start Association). For the purpose of estimating burden hours, the upper limit of this range (i.e., 90 minutes) is used.

Estimates for the median hourly wage for respondents are based on the Department of Labor (DOL) 2013 estimates for education administrators of preschool and child care programs, retrieved from: <http://www.bls.gov/oes/current/oes119031.htm>. Based on these data, the mean hourly wage for preschool or child care directors ranges from \$22.38 to \$34.21 per hour. For the purpose of estimating burden hours, the upper limit of this range is used (i.e., \$34.21) as the hourly wage for all 100 respondents. Table A-12 shows estimated burden and cost information.

**Table A-12:** Estimated Annualized Burden Hours and Costs to Respondents

Type of Respondent	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
ECE Director or Staff Member; TA provider	100	1	1.5	150	34.21	\$5,131.50
<b>TOTALS</b>	100	100		150		<b>\$5,131.50</b>



### 13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

There will be no direct costs to the respondents other than their time to participate in the data collection.

### 14. Annualized Cost to the Government

**Table A-14:** Estimated Annualized Cost to the Federal Government

Staff (FTE)	Average Hours per Collection	Average Hourly Rate	Average Cost
Social Science Analyst, GS 13	2	44.97	\$89.94
Social Science Analyst, GS 13	2	44.97	\$89.94
<b>Estimated Total Cost of Information Collection</b>			<b>\$5311.38</b>

### 15. Explanation for Program Changes or Adjustments

This is a new data collection.

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

The qualitative information gathered from the large group discussion will be summarized by ASPE's contractor for this work (Child Trends). Child Trends will pull out the main themes from the group discussion and provide as notes to the federal project officers (FPOs). Together, Child Trends and the federal project officers will then decide what implications these themes have for two project products: (1) a brief summarizing opportunities and challenges ECE programs face when linking administrative data (which will already be underway at the time of the conference session); and (2) a series of resources to support programs in linking and using linked administrative data. For the opportunities and challenges brief, Child Trends may make edits/revisions based on themes from the large group discussion. For the series of resources, Child Trends and the FPOs will decide which resources are likely to be most useful to programs, based on the main themes that emerge from the large group discussion. Both the brief and the series of resources will be made publically available after they are finalized and cleared by HHS/ASPE leadership, with Head Start and other ECE program directors and staff as the main intended audience.

#### Project Time Schedule

- February – March 2015: Group discussion questions are developed by Child Trends staff and revised based on FPOs feedback (see Attachment A).
- March 31, 2015: Large discussion group session will occur at the National Head Start Association (NHSA) conference, facilitated by Child Trends staff.
- April 2015: Main themes from the group discussion will be summarized by Child Trends and submitted to the FPOs.

- April/May 2015: Child Trends will make edits to “opportunities and challenges brief,” if needed, based on themes from large group discussion.
- May – July 2015: Series of resources will be developed and revised, based on main themes from large group discussion.
- August - September 2015: Brief and series of resources will be finalized and begin clearance process.
- September - October 2015: Brief and series of resources will go through ASPE clearance process and will then be released for public distribution.

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

We are requesting no exemption.

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

There are no exceptions to the certification. These activities comply with the requirements in 5 CFR 1320.9.

**LIST OF ATTACHMENTS – Section A**

Note: Attachments are included as separate files as instructed.

- A. BCULD Exploratory Discussion Questions for NHSA Conference Session