

Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes

Understanding Child Care Licensing Challenges, Needs, and Use of Data

Formative Data Collections for ACF Research

0970 - 0356

Supporting Statement

Part A

February 2021

Submitted By:
Office of Planning, Research, and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services

4th Floor, Mary E. Switzer Building
330 C Street, SW
Washington, D.C. 20201

Project Officer:
Ivelisse Martinez Beck, Ph.D.

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Executive Summary

- **Type of Request:** This Information Collection Request is for a generic information collection under the umbrella generic Formative Data Collections for ACF Research (0970-0356).
- **Description of Request:** We plan to conduct interviews with the child care licensing administrator in each state and territory, as well as the District of Columbia ($n = 56$), regarding their experiences implementing the provisions in the reauthorized Child Care and Development Block Grant (CCDBG) Act of 2014, changes they made to their licensing systems during the COVID-19 pandemic, how they use data, issues they face that could be addressed via research, as well as their needs and preferred formats for research-based resources. Additionally, we plan to conduct interviews with someone in each state/territory who is familiar with their licensing data system to understand its structure, quality, and use ($n = 56$). The information will be used to inform future research efforts, including possible sample selection for later studies, and to design products to support the use of data and research in child care licensing. The data will not be used to generalize to a broader population, and we do not intend for this information to be used as the principal basis for public policy decisions.

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Part A

A1. Necessity for Collection

Child care licensing agencies in the states and territories are required to meet a large number of federal requirements codified in the provisions of the CCDBG Act of 2014. Although these licensing agencies must meet certain federal requirements, there is wide variation among states/territories in a number of important ways. For instance, the types of child care providers required to be licensed, the content and extent of licensing regulations, the governance structure of licensing agencies, licensing procedures, and the broader context that can influence the licensing system (e.g., number of licensed providers, rural vs. urban areas, percentage of children in poverty) all vary by state/territory. Additionally, the recent COVID-19 pandemic placed unforeseen stress on these agencies to develop regulations and procedures to implement Governors' orders about child care closures, the provision of care for the children of emergency workers, and re-opening. The prevalence of COVID-19, as well as the type and timing of policies related to re-opening businesses, also vary widely across states/territories. Thus, each state/territory has unique characteristics and needs that influence its licensing system.

This data collection is designed to help the Administration for Children and Families (ACF) Office of Planning, Research, and Evaluation (OPRE) identify priorities for future agency research and better meet the needs of the licensing agencies through research and related resources. Because of the wide variation among states/territories, the research goals can only be met by gathering information from as many states/territories as possible, ideally all of them. This will be especially important to determine how best to support licensing agencies during and after the pandemic. There are no legal or administrative requirements that necessitate this collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose

Purpose and Use

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for research and evaluation (0970-0356):

- inform the development of ACF research,
- maintain a research agenda that is rigorous and relevant, and
- ensure that research products are as current as possible.

This formative data collection is part of a larger contract between OPRE and Child Trends/ICF, called The Role of Licensing in Early Care and Education (TRLECE), to study and support the child care licensing system over a five-year period. The information gathered through this formative data collection will inform future research for the project as well as OPRE.

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The purposes of this data collection are:

- Understand child care licensing administrators' views of the key issues and challenges for the licensing unit in implementing the provisions of the reauthorized CCDBG Act of 2014;
- Understand the extent to which child care licensing administrators use data to make decisions regarding licensing;
- Identify pressing issues facing licensing staff that could be addressed via research;
- Develop ideas for data-related resources to help strengthen state/territory licensing systems;
- Identify formats for research or data-related resources that would be most useful to licensing staff;
- Identify states/territories with which we might partner for future research studies as part of the larger TRLECE project; and
- Learn about changes made to the licensing system in response to the COVID-19 pandemic, to inform future research questions and products.

Child Trends and OPRE will use the information collected to inform the TRLECE project about developing research-related resources for child care licensing administrators and their staff, designing future research studies to meet state/territory needs, and identifying state/territory partners for future research projects. OPRE will also use the information to inform its overall research agenda and the work of ACF.

The information collected is meant to contribute to the body of knowledge on ACF programs. It is not intended to be used as the principal basis for a decision by a federal decision-maker and is not expected to meet the threshold of influential or highly influential scientific information.

Guiding Research Questions

The research questions for this qualitative, formative data collection include:

- What are child care licensing administrators' key issues and challenges in implementing the provisions outlined in the reauthorization of the CCDBG Act of 2014, both before and since the COVID-19 crisis?
- How did the COVID-19 pandemic affect their licensing policies and systems?
- To what extent do child care licensing administrators and their team use data to make decisions regarding licensing?
- What is the quality and usability of states'/territories' licensing data system?
- What are licensing administrators' main questions regarding licensing that could be addressed through research?
- What information are licensing administrators seeking and what product formats would they find most useful in helping them make decisions regarding licensing?

Study Design

This formative data collection will include interviews with the child care licensing administrator, as well as someone familiar with child care licensing data, in each state, territory, and the District of Columbia

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(n = 56). Based on our prior work with child care licensing, we know that the issues faced by each state and territory are unique. Including as many states and territories as possible is important because they vary enormously in how their child care licensing system is organized, where the licensing staff and licensing data are housed, and their ability to access and use data. Qualitative interviews are ideal for situations like this where the range of possible responses is unknown and the information is unlikely to fit into discreet, predefined categories. Interviews will allow us to gather deep and nuanced information to meet the study objectives. Table 1 provides details about the respondents, instruments, frequency, and duration of the interviews.

As described in SSB, section B1, this study is intended to present internally-valid descriptions only. It is not intended to promote statistical generalization to other sites or service populations.

The main limitation of this design is that it will require interviewers who are very well versed in child care licensing to ensure that comparable, valuable information is collected across respondents. Additionally, due to the wide variation between states/territories, a high response rate will be necessary for the information to reflect the variability evident across states and territories. Limitations will be noted in materials resulting from the information collected.

Table 1. Summary of Proposed Data Collection Activities

Data Collection Activity	Instruments	Respondents, content, and purpose	Mode, Frequency, and Duration
Interviews with child care licensing administrators	Protocol attached (INSTRUMENT A)	<p>Respondents: Child care licensing administrators in all states, territories, and the District of Columbia.</p> <p>Content: The questions will focus on the state’s child care licensing system; changes that resulted from the COVID-19 pandemic; how data and research is used; and what the child care administrator would like to learn about licensing systems.</p> <p>Purpose: Understanding child care licensing administrators’ key challenges in implementing CCDBG reauthorization; changes made to the licensing system in response to the COVID-19 pandemic; and identifying pressing issues facing licensing staff that could be addressed via research.</p>	<p>Mode: Interview</p> <p>Frequency: one time</p> <p>Duration: 60 minutes</p>
Interviews with staff	Protocol attached	<p>Respondents: Staff knowledgeable about the data system, in all states, territories, and the</p>	<p>Mode: Interview</p>

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Data Collection Activity	Instruments	Respondents, content, and purpose	Mode, Frequency, and Duration
knowledgeable about the child care licensing data system	(INSTRUMENT B)	District of Columbia, as identified by the child care licensing administrator. Content: The questions will focus on the state’s child care licensing data, how the licensing agency uses data and research, and changes to the state’s licensing data collection and use that resulted from the COVID-19 pandemic. Purpose: Understanding the extent to which child care administrators use data to make decisions regarding licensing; develop ideas for data-related resources; and identify formats for data-related resources that would be most useful to licensing staff.	Frequency: one time Duration: 30 minutes

Other Data Sources and Uses of Information

No other data sources will inform this initial information collection activity. We expect to use the information from this data collection activity to inform future research studies of this project that will require OMB clearance, but we have no definitive plans to do so at this time. Once plans are developed, we will submit an OMB clearance package and reference this OMB clearance.

A3. Use of Information Technology to Reduce Burden

We will contact each respondent (i.e., child care licensing administrators and data systems person) via email and telephone to solicit their participation (See APPENDIX A and APPENDIX B for emails and call scripts).

To make scheduling as easy as possible for the interviewees, the email will direct respondents to a scheduling platform link so they can select the interview slot that works best for them.

All interview questions will be programmed into REDCap, the contractor’s secure online data collection and management platform, and the notetaker will type notes into REDCap during the interview. Additionally, all interviews will be audio recorded with Microsoft Teams software, with respondent permission, so that coders can refer to them as needed if the notes are unclear or incomplete.

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A4. Use of Existing Data: Efforts to reduce duplication, minimize burden, and increase utility and government efficiency

The Office of Child Care (OCC) is working with the National Center on Early Childhood Quality Assurance (ECQA) and the State Capacity Building Center (SCBC) to compile information from public documents and state websites regarding changes to state/territory policies and guidance in response to COVID-19. This information will provide context to our work and we will not request information that is discovered from that effort. The TRLECE interviews are needed to understand the challenges faced during COVID-19, changes to the licensing system because of COVID-19, and the extent to which changes might impact the licensing system in the long term. The TRLECE interviews also cover topics beyond COVID-19 (e.g., use of data, challenges in implementing new federal requirements).

To inform the development of the interview questions for this data collection, we reviewed the questions from the 2017 Child Care Licensing Survey and the recent COVID-19 survey from the National Association for Regulatory Administration (NARA). Child care licensing staff completed both surveys. The Child Care Licensing Survey will be conducted again in 2021, and we have coordinated with the team conducting the survey to minimize duplication. The Child Care Licensing Survey is limited to closed-ended questions. The TRLECE team has developed questions that are best suited for interviews rather than surveys (e.g., how data are used, how the licensing system changed during the COVID-19 pandemic). The NARA COVID-19 survey provides some information from very early in the pandemic but does not cover all the topics needed for this study or provide in-depth information to understand changes over time. Open-ended questions in the interview for this data collection will allow us to gather more extensive information about the impact of COVID-19 on the child care licensing system. The proposed interview questions for this data collection activity build on, rather than duplicate, information from these surveys.

A5. Impact on Small Businesses

No small businesses will be involved with this information collection.

A6. Consequences of Less Frequent Collection

This is a one-time data collection.

A7. Now subsumed under 2(b) above and 10 (below)

A8. 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 overarching generic clearance for formative information collection. This notice was published on

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November 3, 2020, Volume 85, Number 213, page 69627, and provided a sixty-day period for public comment. During the notice and comment period, no substantive comments were received.

Consultation with Experts Outside of the Study

A subgroup of the project's technical expert panel (TEP) members reviewed draft interview protocols and provided feedback on their clarity and utility. Based on this feedback, we revised the protocol and then requested feedback from OCC staff. OCC staff feedback was incorporated, and we pilot tested the revised drafts in December 2020. We pilot tested the data systems protocol with two former state employees who were knowledgeable about state/territory licensing and licensing data and we tested the child care licensing administrator protocol with two former state child care licensing administrators. The protocols and emails were revised and finalized based on these efforts. See Supporting Statement B, section B3 for more information about piloting efforts to develop the protocols.

A9. Tokens of Appreciation

No tokens of appreciation will be offered.

A10. Privacy: Procedures to protect privacy of information, while maximizing data sharing

Personally Identifiable Information

The only personally identifiable information (PII) we will collect is the information needed to contact the respondents: names, job title, email addresses, and phone numbers of licensing administrators and staff knowledgeable about data system. Note that contact information for the licensing administrators is public. All PII will be stored in REDCap, our secure online data collection and management platform, which is hosted on our FISMA compliant Microsoft Azure Server during data collection. Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier. Following data collection, PII will be stored on Child Trends' secure server.

Assurances of Privacy

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data and that their participation is voluntary. As specified in the contract, the Contractor will comply with all Federal and Departmental regulations for private information.

Before beginning the interviews, we will ask participants for permission to audio record their interviews and will do so only if they provide verbal consent.

Data Security and Monitoring

As specified in the contract, we will protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. We have developed a Data Security Plan that assesses all protections of respondents' PII. As is described in our Data Security Plan, during data collection all PII and interview data will be stored in REDCap, our secure online data

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collection and management platform, hosted on a FISMA compliant Microsoft Azure Server. Immediately following each interview, the recordings will be transferred to REDCap, where they will be securely stored, and deleted from the recording device. We will ensure that all employees, subcontractors (at all tiers), and employees of each subcontractor who have access to these data are trained on data privacy issues and comply with the above requirements. At the completion of data collection and analysis, data will be stored on Child Trends' secure drive to which only authorized users have access. The secure drive utilizes Windows Active Directory security groups for access control and utilizes Encrypting File System (EFS) on demand.

A11. Sensitive Information ¹

This proposed information collection does not request any sensitive information.

We obtained an IRB exemption from Child Trends' internal IRB on December 3, 2020. The exemption was based on the 2019 revision to the Common Rule exemption category 2 (ii): "disclosure of the human subjects' responses outside the research would not reasonably place the subjects at risk of criminal or civil liability or be damaging to the subjects' financial standing, employability, educational advancement, or reputation." See Appendix C for the IRB determination.

A12. Burden

Explanation of Burden Estimates

Burden estimates are based on our pilot testing. The licensing administrator interview will take no more than 60 minutes and the interview with the staff member knowledgeable about data system will take no more than 30 minutes. There may be some cases where the same individual completes both interviews. In those cases the combined interviews will take no more than 90 minutes.

Estimated Annualized Cost to Respondents

Table 2 details the annualized cost to respondent calculations. For both types of respondents, we are assuming an average hourly wage with benefits of \$62.63 based on the Bureau of Labor Statistics (BLS) estimates for total compensation for management and professional state and local government workers.²

¹ Examples of sensitive topics include (but not limited to): social security number; sex behavior and attitudes; illegal, anti-social, self-incriminating and demeaning behavior; critical appraisals of other individuals with whom respondents have close relationships, e.g., family, pupil-teacher, employee-supervisor; mental and psychological problems potentially embarrassing to respondents; religion and indicators of religion; community activities which indicate political affiliation and attitudes; legally recognized privileged and analogous relationships, such as those of lawyers, physicians and ministers; records describing how an individual exercises rights guaranteed by the First Amendment; receipt of economic assistance from the government (e.g., unemployment or WIC or SNAP); immigration/citizenship status.

² U. S. Department of Labor, Bureau of Labor Statistics "National Compensation Survey: Table 3: Employer costs for employee compensation for state and local government workers by occupational and industry group." 2019. <https://www.bls.gov/news.release/pdf/ecec.pdf>.

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We will invite 56 child care licensing administrators to participate and anticipate that approximately 50 will agree. However, based on our initial recruitment efforts we think that most will request that a second person join the interview with them so are estimating 100 respondents to the Licensing Administrator interview. Likewise, we will invite 56 staff members knowledgeable about data systems and anticipate approximately 50 will agree and most will request a second person take part so we have also estimated 100 respondents to the Data Systems interview.

Table 2. Annualized Cost to Respondents

Instrument	No. of Respondents (total over request period)	No. of Responses per Respondent (total over request period)	Avg. Burden per Response (in hours)	Total Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Licensing Administrators	100	1	1.00	100	\$62.63	\$6,263.00
Staff member knowledgeable about data system	100	1	0.50	50	\$62.63	\$3,131.50
Total	100			150	\$62.63	\$9,394.50

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

The total cost for the data collection activities under this current request will be \$392,387. This amount includes all costs related to study design, development, field work, analysis, and dissemination. See Table 3 for a breakdown of costs.

Table 3. Annualized Cost Breakdown

Cost Category	Estimated Costs
Instrument Development and OMB Clearance	\$ 70,000
Data Collection	\$ 160,415
Analysis/Publications/Dissemination	\$ 161,972
Total Costs	\$ 392,387

A15. Reasons for changes in burden

This is for an individual information collection under the umbrella formative generic clearance for ACF research (0970-0356).

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A16. Timeline

Table 4. Timeline

Task	Time After OMB Approval
Begin recruitment	Within 1 week
Data collection	Months 1 through 6 (6 month window)
Data analysis	Months 4 through 9 (5 month window) (Note: Data collection and analysis overlap because we plan to begin creating the coding structure when half of the interviews are complete; see section B7).
Draft report	Months 10 through 15 (6 month window)
Final report	Month 16

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

INSTRUMENT A: TRLECE Licensing State Administrator Interview Protocol

INSTRUMENT B: TRLECE Data Systems Staff Interview Protocol

APPENDIX A: TRLECE Recruitment Email and Call Scripts for Licensing State Administrator

APPENDIX B: TRLECE Recruitment Email and Call Scripts for Data Systems Staff

APPENDIX C: TRLECE IRB Exemption Letter

APPENDIX D: TRLECE Draft Letter of Support from Office of Child Care (OCC)