

## **Appendix A**

### **Comments Received on 60-Day Federal Register Notice**

June 18, 2021

Submitted via email (OPREinfocollection@acf.hhs.gov).

Attn: OPRE Reports Clearance Officer  
Administration for Children and Families  
U.S. Department of Health & Human Services  
330 C Street, S.W.  
Washington, D.C. 20201

Re: Proposed Information Collection Activity; Early Head Start-Child Care Partnerships Sustainability Study (86 FR 20699)

To Whom It May Concern:

Start Early and the Educare Learning Network appreciate the opportunity to offer a joint comment to the U.S. Department of Health & Human Services regarding the Early Head Start-Child Care Partnerships (EHS-CCP) Sustainability Study. With our mission of giving children in poverty the best chance for success in school and in life, Start Early advocates for the highest quality care and education for children from birth to age five. Thousands of young children, parents, and members of the early childhood workforce are reached each year through our programs, training, evaluation, and advocacy efforts. Start Early serves as the backbone for the Educare Learning Network (ELN), a national network of 25 birth-through-age 5 schools that aims to improve access to high-quality early education across the country. The Network builds strong public-private partnerships to create strong schools and longtime champions who will amplify our call for change. Below, Start Early and ELN offer additional considerations for EHS-CCP evaluators, informed largely by a community of practice of the 12 Educare operating organizations that have participated in EHS-CCP. In alignment with our commitment to centering and amplifying early childhood practitioner voice, in each section below, we offer direct quotes from the EHS-CCP grantees surveyed in addition to a summary of our comments and recommendations.

### **Study Importance & Use of Data**

The EHS-CCP grantees consulted for this comment offer that the data collected by ACF in this study should be used to demonstrate the value that the partnerships add to child care programs and improving family and child development and outcomes. Further, they offer that the data should be used for asset mapping

#### ***VOICES FROM THE EDUCARE LEARNING NETWORK:***

*“My hope would be that we would be able to show how powerful and impactful the work that we do in EHS-CCP is in being able to level the playing field when it comes to supporting the overall development and education of the children and families we serve. My hope is that we would be able to show that the approach that we use in our work sets up each and every child and their family for future school success in a most equitable and respectful way. My hope is the data validates our approach and would be a springboard to partner with as many providers as possible to continue the work that we do.” -Jami Pollis, Early Childhood Education Coach, Educare Central Maine/Kennebec Valley Community Action Program*

and creating best practices for programs participating in EHS-CCP grants. The data collected should be analyzed for regional similarities and differences, trends in gaps and strengths, and asset mapping that

can be used to support programs in areas of specific need. This would allow ACF to leverage the deep knowledge base that has been built up by current grantees to strengthen and sustain current and future EHS-CCP grants and enhance their impact on child and family outcomes.

In particular, programs would benefit from best practices for data collection and sharing among partners. The EHS-CCP grantees engaged in this commenting process reported a wide range of experiences in regard to what partner data they readily have access to and who they share it with (e.g. internal school leaders, Head Start Policy Council, staff, governing boards, state government). Given the importance of program data for continuous quality improvement, we recommend that the data collected for ACF's evaluation be used to develop best practices and exemplars in this area, among others. As ACF uses data from this sustainability study to determine what technical assistance EHS-CCP grantees need, we encourage the agency to consider establishing a EHS-CCP Training and Technical Assistance Center as needed. As ACF uses data from the sustainability study to determine the technical assistance needs of grantees, we encourage the agency to consider establishing a EHS-CCP Training and Technical Assistance Center if needed.

### **Suggested Changes to Collection Instruments**

The EHS-CCP grantees consulted for this comment indicated that the following topics are of critical importance to the partnerships and should be explored in ACF's surveys and interviews:

- **Workforce development and support**, e.g. access to professional development and higher education attainment during the partnership and growth from coaching. We appreciate ACF including workforce development factors in its draft surveys and interview protocols, and recommend including questions on the *timing* of credentials received to identify whether higher education attainment increased during the period of partnership and whether child care providers were able to provide various types of professional development to their staff members *prior* to their participation in EHS-CCP. Additionally, ACF's questions regarding professional growth and development focus primarily on the attainment of formal credentials.

**VOICES FROM THE EDUCARE LEARNING NETWORK:**

*"Partners enjoy the collaboration, the technical assistance support and the financial support that our grant offers. We have heard from multiple partners over the past year that without our support, their programs might have had to close. For many of our partners, just having someone to talk through things with is incredibly helpful." - Jami Pollis, Early Childhood Education Coach, Educare Central Maine/Kennebec Valley Community Action Program*

We recommend broadening these questions to include staff and leaders growth from peer-to-peer coaching as well as alternative, competency-based workforce development pathways that build the knowledge, skills, and practice expertise.

- **COVID-19 impacts and resiliency factors**, e.g. what specific supports allowed programs to remain operational during COVID, partners' lessons learned from the pandemic,

strategies that were implemented due to the pandemic and will be continued. We appreciate ACF's draft questions related to how COVID-19 affected vacant slots, providing infant/toddler care, home-visiting opportunities, and more. Grantees surveyed for this comment emphasized the need for information around how COVID-19 affected: the stability of programs' funding sources, workforce retention, what types of support child care partners requested from their

partner EHS programs, and what types of supports families requested and received from programs.

- **Supports for children with developmental delays or disabilities.** We appreciate ACF’s questions regarding the availability of developmental screenings and who provides and receives them. We also recommend asking specifically about the longer-term success of children who receive these screenings (e.g. the number of children with IEPs who no longer need them at age

**VOICES FROM THE EDUCARE LEARNING NETWORK:**

*“The ability to keep partners viable is understated. It’s not in most people’s nature to put a spotlight on the fact that without these supports ‘they may have had to close doors’ as many feels this makes them look unstable or financially unreliable. However, in truth, many only were able to stay open or close for Covid concerns, because of the partnership and the stability we provide.” - Andrew Bourassa, Supervisor and Educational Coach for MSAD 54 and KVCAP Pre-K Programs at Educare Central Maine/Kennebec Community Action Program*

five) and what role EHS-CCPs played in increasing access to screenings and use of screening data to inform services and instruction.

The EHS-CCP grantees we surveyed emphasized the importance of using narratives and anecdotes in addition to data, and appreciate ACF’s use of both interviews and surveys, as well as the many opportunities the surveys offer to provide alternative responses (“other, please specify”). We are also excited that many of the questions speak specifically to unique challenges and successes experienced in serving infants and toddlers and hope that

the data can inform how providers can enhance and expand these critical services.

Additionally, we recommend that in question 16 of the Sustained Partner Interview Protocol, ACF change “maternity leave” to “parental leave” to be inclusive of providers and parents of all genders and all types of parental leave policies offered by early childhood programs.

**Data Collection Considerations**

Given the many demands placed on early childhood program leaders, we recommend that ACF consider leveraging programs’ existing, readily accessible data to help inform EHS-CCP program planning, technical assistance, and research. Table 1 below is a summary of the partner data that is accessible to the EHS-CCP program leaders surveyed for this comment:

**VOICES FROM THE EDUCARE LEARNING NETWORK:**

*“I feel we do a good job of capturing the data but it is hard to quantify some things we do. The stories are what people care about and sometimes those are not quantifiable.” - Melissa Manning, Training & Professional Development Coordinator, Educare Oklahoma City/Sunbeam Family Services*

*“[What is not being captured about the impact we are making is] [w]hat is truly needed to support infants, toddlers and families in small group size and pay staff a livable wage.” – Lori Pittman, Governmental Affairs Advisor Educare Seattle, Puget Sound ESD and Co-Chair, Educare Policy Workgroup*

Table 1: Partner data availability		
Collects and can access OR could easily access:		Does not collect/no plans to collect:
<ul style="list-style-type: none"> <li>• QRS statistics</li> <li>• Infant CLASS observations</li> <li>• Pre-K CLASS observations</li> <li>• ITERS-3 observations</li> <li>• Child assessment EHS-CCP data using TSG</li> <li>• Provider statistics (# of providers in your state/community over the past few years)</li> <li>• Provider feedback about the partnerships</li> <li>• EHS-CCP data on supports you are providing to each partner (i.e. coaching, mentoring, renovation funds, etc.)</li> <li>• Family surveys/interviews</li> </ul>	<ul style="list-style-type: none"> <li>• Family outcomes:               <ul style="list-style-type: none"> <li>○ Families as lifelong educators (reading together, college savings, etc.)</li> <li>○ Families as learners (education, etc.)</li> <li>○ Family connections to peers and community (social supports, community connections, etc.)</li> <li>○ Positive parent-child relationships (family time, guidance/discipline, etc.)</li> <li>○ Parents as advocates and leaders (civic process, parent advocacy, etc.)</li> <li>○ Family well-being (housing, transportation, childcare, employment, etc.)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• FCCERS-3 observations</li> <li>• Child assessment EHS-CCP data using DRDP</li> <li>• Child assessment EHS-CCP data using COR</li> </ul>

We also encourage OPRE to consider compensating survey and interview participants for their time. The EHS-CCP grantees consulted for this comment indicated that participating in interviews may be a challenge particularly for family or home-based child care providers, who often rely on a small, core group of staff and may find it difficult to find coverage for their child care duties during interview participation.

**Considerations for Future Studies**

The EHS-CCP grantees we spoke with for this comment indicated that they are eager for an opportunity to evaluate the community-wide impact of the partnerships. Child care partners serve many children and families who are not directly involved in the partnership work, but may benefit indirectly from the peer learning, professional development, and program assessment and continuous quality improvement that takes place through EHS-CCP. Though outside of the scope of the sustainability study proposed by ACF, we recommend that these potential indirect benefits of the partnerships be explored in future studies.

**VOICES FROM THE EDUCARE LEARNING NETWORK:**

*"I'm not sure that we have found an effective way to collect data on the community impact of our partnerships. We often focus on child outcomes and specific family outcomes for those children and families enrolled in our slots. With that being said, many of our partners have a significant part of their enrollment not directly involved in our partnership. Those staff, children, and families are indirectly impacted and that is the data I believe could help round out our story. How many programs have increased enrollment, staff retention, etc. as a direct result of our involvement?" -Jami Pollis, Early Childhood Education Coach, Educare Central Maine/Kennebec Valley Community Action Program*

Thank you for consideration of the above comments. For any additional information, please contact Nadia Gronkowski, Program Manager of Advocacy and Policy at Start Early, 33 W. Monroe Street, Suite 1200, Chicago, Illinois 60603, [ngronkowski@startearly.org](mailto:ngronkowski@startearly.org).

Sincerely,



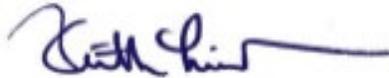
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