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Subject: NonSubstantive Change Request – Head Start Family and Child Experiences Survey (FACES 2019) (OMB #0970-0151)

This memo requests approval of nonsubstantive changes to the approved information collection, Head Start Family and Child Experiences Survey (FACES 2019) (OMB #0970-0151).

Background

The Administration for Children and Families' FACES study periodically collects nationally representative information about Head Start programs, their staff, and the children and families they serve to inform program planning and technical assistance and enable research. A full request package specific to the spring 2022 data collection was approved on December 20, 2021, and a nonsubstantive change describing the cancelation of classroom observations was approved on February 14, 2022.

Overview of Requested Changes

1. Updates to consent forms and consent collection procedures

Due to the COVID-19 pandemic (including staffing shortages at Head Start programs, the inability to send field staff to programs, and program closures resulting from outbreaks), distributing and collecting parent consent forms was extremely challenging in fall 2021. As a result, we did not meet our target number of eligible and consented children in FACES or AIAN FACES. Among the parents providing consent, we also had a lower survey completion rate than anticipated.

The consent process was supposed to span the fall 2021 data collection and the spring 2022 child-level data collection was to include those parents who had consented in the fall. Because consent rates were low in the fall, we are extending the consent process for children selected in the fall into spring 2022.

In addition to extending the consent timeframe, we also propose changes, bulleted below, to minimize burden on programs and facilitate consent distribution and collection. Some of these can also be used to promote survey completion. These changes include:

- *Updates to consent forms.* We updated the parent consent forms (Attachment 29 for FACES and Attachment 35 for AIAN FACES) to remove references to fall activities and the cancelled FACES classroom observations. After a review by ACF's privacy expert, we also updated consent language in the parent, teacher, center director, and program di-

rector surveys to provide additional clarification on how and with whom data will be shared.

- *Direct consent outreach and verbal consent.* In the fall, parents received invitation letters that contained a hard copy consent form and a link to the consent website from the on-site coordinator (OSC), a Head Start staff person who helps distribute and collect consent forms. Although not originally planned, we are now continuing this process in the spring. Further the study team will ask programs for contact information of parents (phone and email) and if provided, we will contact parents directly asking them to complete the consent form verbally or electronically.
 - We added questions to the parent consent form to accommodate verbal consent (Attachment 29 for FACES and Attachment 35 for AIAN FACES) and assess the mode parents would like to complete the survey. We have also removed nonessential items about cell phone plans and internet access. Because burden for the consent form was accounted for in fall 2021 data collection, time to complete the consent form has been included in the total burden for new respondents to the spring parent surveys (Attachment 30 for FACES and Attachment 36 for AIAN FACES).

The verbal consent approach may be easier for parents to participate in the consent process by removing the need to obtain a hardcopy consent and mail it back.

Mathematica confirmed with its IRB that contacting parents directly and verbal consent are allowable. The study team will follow our IRB's guidance on this approach, which includes giving parents the opportunity to ask questions, making sure parents understand what they are consenting to, and offering to provide parents with a copy of the consent form.

- *In-person field staff.* We will send a field staff person to Head Start programs to distribute consent forms and provide information to parents about the study. This approach has been used successfully in prior rounds of FACES and AIAN FACES, but was not used in fall 2021 due to the pandemic. We will send field staff only to programs that (a) have fall parent consent rates lower than 75 percent (as of March 3rd, there are 46 FACES and 16 AIAN FACES programs meeting this criterion) and (b) are allowing visitors. The field staff will either be from Mathematica or someone hired locally from the community.

2. Additional materials to raise awareness about the study

Appendix AA contains flyers and other tools we will use to raise community awareness about the studies and encourage participation:

- AA.2a-d FACES/AIAN FACES spring 2022 special study information sheets
 - Purpose: To encourage consents and survey completion by describing the studies to sampled parents, teachers, center directors, and program directors in a compelling way. The sheets include a direct request to “hear the voice of Head Start parents” and a finding from a previous wave of the study to show why the study is important and how the data is used.

- Use: Parents, teachers, center directors, and program directors will receive the information sheets with their hard copy consent forms (parents) and study invitations (staff).
- AA.3 FACES/AIAN FACES spring 2022 special reminder flyer for parents
 - Purpose: To encourage parents of selected children to complete consent forms and participate in FACES and AIAN FACES.
 - Use: Center staff will send the flyers home with selected children whose parents have not yet completed their consent forms. The flyer could also be posted to the classroom door, or to a private page of a social media tool, such as Class Dojo or Ready Rosie, for groups of selected children.
- AA.4 Examples of reminder language that will be used across different platforms
 - Purpose: To encourage parents to complete their consent forms and to remind all participants to complete their surveys.
 - Use: Staff can use the example text to remind parents to complete their consent forms. The text can be used for email, text, or private social media communication. OSCs and directors can also use the example text to remind teachers to complete their teacher surveys and teacher-child reports.

In addition to Appendix AA, we have revised the previously approved spring 2022 respondent materials (Appendix Y for FACES and Appendix Z for AIAN FACES) to make a more compelling case for respondents to participate in the studies, communicating the importance of hearing respondents' voices.

3. Increased spring honorarium for the OSC

In their position as the main study contact at the program, the OSC plays a critical role communicating study information to program and center staff, distributing and collecting consent forms, and communicating information back to Mathematica study staff. The OSC's familiarity with families and the families' trust in the local staff member is imperative for a successful data collection effort. In typical waves of FACES and AIAN FACES, the OSC's spring responsibilities are significantly fewer because the consent process is complete and as such, we would typically provide lower honoraria in the spring. However, because we did not reach our consent targets in the fall and have therefore extended the consent effort to the spring, the OSC will still have significant responsibilities in spring 2022. Because the OSC's work in the spring will require a similar level of effort as in the fall, we propose increasing the spring honorarium from \$250 to \$500 to match the honorarium offered in fall 2021. We describe the honorarium increase in Supporting Statement Part A, section A.13.

4. Instrument Revisions based on OMB and OHS requests, and to reduce burden

We made four types of revisions to the spring 2022 instruments:

1. We revised the instruments to respond to OMB's request on a December 2nd call (with OMB and OPRE), OMB asked the team to revise the spring instruments to better ad-

- dress the role of Head Start as an employer as well as to serve as a baseline for any potential policy changes to the early childhood education landscape (e.g., the potential Build Back Better Act). The research team reviewed the existing items and worked extensively with the Office of Head Start (OHS) to identify relevant changes to the existing surveys. We both added and removed items to balance the new content with the overall burden on respondents.
- o Changes to the program director surveys (Attachment 12 for FACES and Attachment 21 for AIAN FACES) include additions and revisions to gather information about compensation and benefits for teachers and other staff.
 - o Changes to the center director surveys (Attachment 13 for FACES and Attachment 22 for AIAN FACES) include revisions and additions to gather additional information about staff recruitment and retention, and whether centers are experiencing staffing challenges.
 - o Changes to the teacher surveys (Attachment 11 for FACES and Attachment 20 for AIAN FACES) include revisions and additions to gather additional information about teacher retention. We have also revised items on supports for staff well-being to align with new items in the program director surveys.
2. We also revised the surveys to respond to OHS's request to gather additional information on topics already in the survey and that will help to provide a baseline for the changing early childhood education landscape (ECE, see below).
- o Changes to program director surveys (Attachment 12 for FACES and Attachment 21 for AIAN FACES) to gather information about programs' emergency management and disaster preparedness plans and activities. We revised items about family recruitment to better serve as a baseline for understanding changes in enrollment and potential under-enrollment. We have also revised existing items to use OHS' preferred terminology around substance misuse.
 - o Changes to the parent surveys (Attachment 30 for FACES and Attachment 36 for AIAN FACES) include additions and revisions to understand why families select Head Start to provide a baseline as the ECE landscape continues to change. Further additions and revisions to the parent surveys are included to understand whether parents would like opportunities to engage remotely in various family engagement activities.
 - o Changes to the AIAN FACES parent survey (Attachment 36) serve to gather information about parents' involvement in and satisfaction with Head Start. (These items were already in the FACES parent survey).
3. We also revised surveys to provide items that would help us be able to link teachers to classrooms (since they might teach more than one class), facilitate routing through the survey, and allow us to link children to classrooms.
- o We made additions to teacher surveys (Attachment 11 for FACES and Attachment 20 for AIAN FACES) to help us understand classroom configurations by capturing the number of classrooms the teacher teaches and the session type (morning, afternoon, full day, home visitor) for each.

- o We made additions to the teacher-child reports (Attachment 31 for FACES and Attachment 37 for AIAN FACES) to improve our ability to link individual children to classrooms if the teacher teaches more than one class.
4. We revised the spring 2022 parent surveys to reduce the burden for new respondents in the spring who did not complete the fall 2021 survey. Due to low consent and response rates in fall 2021, a larger than expected share of respondents in the spring will be asked questions that are asked “at first interview” (for example, demographic information), increasing the spring burden for these respondents. We consulted with extensively with OHS to identify items that we could cut to reduce burden for the respondents who will only complete the spring survey.
- o We have made cuts to the AIAN FACES parent survey and have made a smaller number of cuts to FACES to reduce burden for respondents.

Overall, the changes to the burden estimates because of the survey changes described above are:

- FACES teacher survey (Attachment 11)
 - o Subtract one minute for returning respondents
 - o Add one minute for new respondents
- FACES program director survey (Attachment 12): Subtract three minutes
- FACES center director survey (Attachment 13): Add one minute
- AIAN FACES teacher survey (Attachment 20)
 - o Add four minutes for returning respondents
 - o Add six minutes for new respondents
- AIAN FACES program director survey (Attachment 21): Add seven minutes
- AIAN FACES center director survey (Attachment 22): Add one minute
- FACES parent survey (Attachment 30)
 - o Subtract seven minutes for returning respondents
 - o Add 12 minutes for new respondents (10 of these minutes are for the consent form)
- AIAN FACES parent survey (Attachment 36)
 - o Subtract seven minutes for returning respondents
 - o Add 15 minutes for new respondents (10 of these minutes are for the consent form)

Supporting Statements A and B and Appendices Q and Z have been updated to reflect the changes described above.

All proposed consent and survey changes fit within the general purpose of the FACES data collection and the intended uses of FACES data. The following instruments have been updated:

- FACES 2019 Head Start teacher survey (Attachment 11)
- FACES 2019 Head Start program director survey (Attachment 12)
- FACES 2019 Head Start center director survey (Attachment 13)
- AIAN FACES 2019 Head Start teacher survey (Attachment 20)
- AIAN FACES 2019 Head Start program director survey (Attachment 21)
- AIAN FACES 2019 Head Start center director survey (Attachment 22)

- FACES 2019 fall 2021 special parent consent form for fall 2021 and spring 2022 data collection (Attachment 29)
- FACES 2019 special Head Start parent survey (Attachment 30)
- FACES 2019 special Head Start teacher-child report (Attachment 31)
- AIAN FACES 2019 fall 2021 special parent consent form for fall 2021 and spring 2022 data collection (Attachment 35)
- AIAN FACES 2019 special Head Start parent survey (Attachment 36)
- AIAN FACES 2019 special Head Start teacher-child report (Attachment 37)

Time Sensitivities

Some programs in the FACES and AIAN FACES samples begin closing for the program year in early May. To allow program and center staff enough time to complete their surveys before then, we must begin data collection no later than mid-April. We also need to implement changes to the consent process, including the planning for and scheduling of in-person consent collection visits, as soon as possible before we start collecting data to maximize our spring sample sizes and to allow enough time to program the changes to the instruments. Activities related to increasing consent rates would be started immediately upon approval of this nonsubstantive change.