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Office of Management and Budget (OMB)

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Date: March 18, 2022

Subject: Non-Substantive Change Request – Study of Disability Services Coordinators and Inclusion in Head Start (OMB #0970-0585)

This memo requests approval of non-substantive changes to the approved information collection, Study of Disability Services Coordinators and Inclusion in Head Start (OMB #0970-0585).

Background

On January 3, 2022, we received OMB approval for the Study of Disability Services Coordinators (DSC) and Inclusion in Head Start (OMB #0970-0585) and on 2/24/22 we received approval for a non-substantive change to revise study materials (recruitment materials and survey items) to account for the number of DSCs that are new to the role. This study will provide a national picture of the DSC workforce for Early Head Start (EHS) and Head Start (HS), including American Indian/Alaska Native (Region XI) and Migrant and Seasonal Head Start (MSHS) (Region XII) grantees and/or delegate agencies.

We released a soft launch of the Phase 1 Survey of EHS/HS Program Directors on 2/8/22 and the full release (with the exception of programs that may require Tribal IRB/RRB or school district approval) on 2/24/22. The first question on the survey asked if respondents are a director of an agency that directly served children through EHS/HS. If they responded “no,” the survey closed, and the link would no longer work. Since then, we have observed a high number of screen-outs as well as received numerous emails from EHS/HS staff asking that we reopen the survey link. These inadvertent screen-outs place undue burden on program staff, who are reaching out to the study team to request that they reopen their survey, and decrease our response rates, since some proportion of individuals who get locked out of the survey will not reach out to the study team to request that it get reopened. Since we are relying on responses to the Phase 1 Survey of EHS/HS Program Directors to build the sample frame for the Phase 2 Survey of DSCs, this issue presents a serious challenge to the overall success of the study. To mitigate these issues, we are requesting the following changes to the Phase 1 instrument and recruitment materials.

Additionally, we have learned that edits to our Tribal Leadership and Superintendent letters are necessary to properly address and provide information to recipients.

Overview of Requested Changes

Instrument 1 Phase 1 Director Survey

- o Introduction
 - For greater clarity, we changed the answer to “Who should complete the survey?” from “directors” to “**EHS/HS Program Directors.**” We deleted the second sentence, which reiterated that “we are not collecting data from directors of delegate agencies that do not provide direct services in EHS/HS programs.”
- o Screener
 - We simplified the screener question by asking “Are you the EHS/HS Program Director?” (Yes/No).
 - We removed termination of the survey based on the screener question. In other words, if respondents answer “No” to the above question, they will still be able to proceed. This will reduce burden on program staff and increase response rates.
- o Module 1
 - While the intended respondents are EHS/HS Program Directors, the survey may be filled out by other program administrators or other EHS/HS staff. Module 1 asks questions about the Director’s background, so we added the following reminder at the beginning of this section: “**INSTRUCTIONS:** As a reminder, if you are not the EHS/HS Program Director, please discuss these questions with your Program Director before responding on their behalf.”
- o Modules 2-6
 - We will also add the following instruction to each of the remaining five modules. “**INSTRUCTIONS:** As a reminder, if you are not the EHS/HS Program Director, please discuss the following questions and responses to those questions with your Program Director.”

Attachment C. Phase 1 Recruitment

- o Follow-up Email from Study Team to Directors:
 - We added “the Director’s Survey” in the first line of the email before the study title to clarify who the survey is for and the purpose of the outreach.
 - In the second paragraph, we added a sentence stating: “Once you complete the Director Survey, your DSC(s) will receive their own survey after you complete this one. Please do not forward this link to your DSC(s).” We made this change to encourage Program Directors to complete the survey themselves rather than passing it along to the DSC to complete. Making the change to the screener question is important for two reasons: 1) it will reduce the number of screen-outs to the Phase 1 survey and 2) to reduce the burden on DSCs who will be asked to fill out the Phase 2.
- o Follow-up Email #2 Study Team to Directors: We revised the language to align with the introduction in the Phase 1 instrument.
 - More specifically, we added “the Director’s Survey” in the first line of the email before the study title to clarify the purpose of this outreach.

- We also clarified that DSCs will receive their own survey after the Director completes this one so please do not forward the survey link to DSC(s).
- Follow-up to Programs that Screened Out (NEW):
 - We added a follow-up email to send to programs that have been inadvertently screened out. It explains that someone from the program started the Program Director survey for the DSC study and was screened out because they indicated “No” to screener question (i.e., they were either not the director or their program does not provide direct services).
 - It also notes that we have reopened the survey link (which is included in the email) and clarifies that the survey should be completed by the EHS/HS Program Director or another program administrator who can provide the program-level perspective.
 - It clarifies that the survey should not be shared with the DSCs, as they will receive their own survey after the Program Director completes this one.
- Follow up Phone Recruitment Study Team to Directors: We revised the language to align with the introduction in the Phase 1 instrument.
 - In the response to “Who should complete the survey?” we changed it from “directors” to “**EHS/HS Program Directors.**”
 - In the “Phase 1 – Survey of EHS/HS Directors” section, we aligned the language with that used in the Phase 1 instrument, noting that “the survey should be completed by EHS/HS Program Directors that provide direct services in EHS/HS centers.”
- Follow up Phone Recruitment FAQ:
 - Under the bullet “Check with others,” we changed “confer” to “discuss” to use plain language.

Change to Tribal Leadership and Superintendent letters

- We began to send out the Tribal Leader and Superintendent letters and in doing so we have learned that changes to the letter are necessary to adequately address respondents, show the study teams knowledge of the review process, and provide sufficient contact information. We are also requesting approval for changes to the Tribal Leader and Superintendent letters, which will allow us to tailor the language based on whether there is a known IRB/RRB or other research review process in place.
 - Outreach Letter to Tribal Leadership: We began to send out the Tribal Leader letters and learned that changes to the letter are necessary to respectfully address Tribal leaders, demonstrate the study team’s knowledge of the research review process, and provide the appropriate contact information.
 - We revised the salutation from “Dear Tribal Leader” to “Dear [JOB TITLE] [LAST NAME].” This change was made to personalize the letters in a respectful manner.
 - We tailored the letter to acknowledge when we are aware of a Tribe’s research review process. Previously, the letter only asked the Tribal leader to inform us of any research review requirements that the study team should observe. We made this change to demonstrate to Tribes that have known

IRBs/RRBs that we are aware of and will follow their research review processes.

- We changed Carol Hafford's phone number from her office line to her cell phone. Since NORC is still operating in a hybrid (in office/remote) environment due to COVID-19, we included her cell phone number to ensure that she will be able to respond promptly to inquiries.
 - We updated the letter signatory from Carol Hafford to the project leadership team – Principal Investigator and Project Director – to follow best practices in conducting study outreach to Tribal programs.
 - We added the Paperwork Reduction Act statement at the bottom of the letter.
- o Outreach Letter to Superintendent:
- We tailored the letter to acknowledge when we are aware of a school district's research review process. Previously, the letter only asked the Tribal leader to inform us of any research review requirements that the study team should observe. We made this change to demonstrate to school districts that have known IRBs that we are aware of and will follow their research review processes.
 - We changed Shannon TenBroeck's title from Co-Principal Investigator to Project Director to convey her role on the study more accurately.
 - We added the Paperwork Reduction Act statement at the bottom of the letter.

Time Sensitivities

This survey is already in the field. Respondents who have already opened the link to the survey will not see any changes to their survey. However, there are still 811 Program Directors (representing ~60% of programs who have received a survey) who have not clicked on the survey link. With OMB's approval of these changes, the study team will move swiftly to program the changes in Qualtrics and push these changes out to all unopened surveys. We will also reach back out to all programs that have screened out with a new, unique link to the survey to provide another opportunity to complete it. As soon as these requested changes are approved, we will also begin sending the revised recruitment language, which will more clearly identify the right respondents and the purpose of this survey.

We will use the revised outreach letter to Tribal Leaders and Superintendents to either inquire about or acknowledge their research review processes.