

The Role of Licensing in Early Care and Education (TRLECE)

**OMB Information Collection Request
0970 – New Collection**

Supporting Statement Part A

OCTOBER 2022

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 Officers:
Ivelisse Martinez Beck, Ph.D.

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

Part A

Executive Summary

- **Type of Request:** This Information Collection Request is for a new collection. We are requesting one year of approval.

- **Description of Request:**
This request includes a collection of three descriptive surveys to deepen the field's understanding of child care and early education licensing systems, which play a critical role in supporting positive outcomes for providers, families, and children. Information collection includes: (1) a survey of all state and territory child care licensing administrators, (2) a survey of all front-line child care licensing staff in all states, and (3) a nationwide survey of licensed child care providers from all states. The child care licensing administrator survey and front-line child care licensing staff survey are not intended to promote statistical generalization to other populations. The child care provider survey is intended to produce findings that are generalizable to the population of licensed child care providers in the U.S. We do not intend for this information to be used as the principal basis for public policy decisions.

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

A1. Necessity for Collection

State/territory child care and early education (CCEE) licensing agencies establish and monitor regulations that child care programs serving young children must meet to operate legally. These regulations and monitoring practices play a large role in the operations of child care programs but have received relatively little research attention. The Office of Planning, Research, and Evaluation (OPRE) within the Administration for Children and Families (ACF) at the Department of Health and Human Services (HHS) is conducting The Role of Licensing in Early Care and Education (TRLECE) project to identify and address gaps in our knowledge of how key licensing features are related to quality and outcomes and to collect new data to help address these gaps. Key gaps include: limited information about features of state/territory licensing units; limited information about the characteristics and perceptions of licensing administrators; no information from front-line licensing staff about their characteristics, experiences, and perceptions of licensing; and limited information about CCEE providers' experiences and perceptions of licensing (i.e., there are a few findings from individual states but no national survey).

To meet these goals, we are proposing three new data collection activities 1) a survey of child care licensing administrators, 2) a survey of front-line child care licensing staff,¹ and 3) a child care provider survey.² Each of these surveys will fill an identified gap in the research regarding CCEE licensing by gathering descriptive information and perceptions of the licensing system from individuals who play key roles in that licensing system but have received almost no research attention.

There are no legal or administrative requirements that necessitate this collection. ACF is undertaking the collection at the discretion of the agency. ACF has contracted with Child Trends to complete this project.

A2. Purpose

Purpose and Use

This primary data collection is intended for research purposes. The TRLECE team is conducting a collection of descriptive surveys. The purpose of these surveys is to fill gaps in the literature and deepen the field's understanding of CCEE licensing systems, which play a critical role in supporting positive outcomes for providers, families, and children. The surveys will provide information about the characteristics, experiences, and perceptions about licensing from three perspectives: licensing administrators, front-line licensing staff, and CCEE providers.

The findings from all three of these surveys are intended to inform multiple audiences. State child care licensing administrators may use the findings to inform changes to licensing policies or practices. ACF may use the findings to inform their guidance and technical assistance to state CCEE leaders and to inform future research agendas. Researchers may use the findings to inform their understanding of the

¹ Front-line staff are individuals who routinely conduct licensing inspections of licensed child care programs. They may have other responsibilities as well, as long as one of their jobs is to routinely conduct licensing inspections.

² For the purposes of this survey, child care providers are defined as center program owners/directors who oversee the day-to-day operations in a center, as well as owners/operators of licensed family child care programs (including group and family child care homes).

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

CCEE system, provide context for studies, or design future studies related to licensing. The team will share findings through public reports, briefs, state profiles, and presentations aimed at various audiences. The licensing administrator survey items related to structural or procedural features of state/territory licensing systems will be linked to their state name in public profiles that the team develops (this is clearly noted in the recruitment materials and survey). The information collected through these surveys will be purely descriptive; it is not intended to evaluate child care licensing systems or to assess the effectiveness or impact of child care licensing systems. Limitations to how the information can be used will be described in any publications (See *Study Design*, below, and Supporting Statement Part B1 for more information about limitations).

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 Questions

This data collection is designed to answer the following guiding questions (see Supporting Statement Part B7 for examples of specific analysis questions):

1. What are key structural features of licensing agencies?
2. What do licensing administrators and front-line child care licensing staff members see as their roles and the purpose of licensing? How do they see the role of CCEE licensing in supporting quality/quality improvement?
3. What do licensing administrators, front-line child care licensing staff, and child care providers see as the strengths and challenges of the licensing system? How do they think that the licensing system could be improved?
4. What are licensing administrators and front-line child care licensing staff members' demographic characteristics, career paths, and professional development experiences?
5. What are the roles and responsibilities of front-line child care licensing staff? What professional development do they receive?
6. How do licensing agencies and front-line staff make decisions about citing violations and enforcement actions?
7. What is the level of job satisfaction, job stress, and self-efficacy of front-line child care licensing staff?
8. What are child care providers' perceptions of the burden, value, and fairness (e.g., consistency across inspectors, fairness in relation to other providers, cost) of the licensing system?
9. What is the association between state-level child care licensing policies and perceptions of the licensing system?

Study Design

The TRLECE team aims to answer the guiding questions through three one-time, web-based surveys. Data collection will take place over approximately five months. Information from each of the three surveys covered by this OMB package will each inform the interpretation of the other surveys. For instance, the front-line child care licensing staff and child care provider surveys both include questions

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

about relationships between providers and front-line staff. In our reporting, we will discuss the ways in which the two groups’ perceptions are the same or different. See Supporting Statement Part B2 for more information on the target population and sampling plan.

As described in Supporting Statement Part B1, the child care licensing administrator survey and front-line child care licensing staff survey are intended to present internally valid descriptions only; they are not intended to promote statistical generalization to other groups. The child care provider survey is intended to be nationally representative, and we plan to apply sampling weights to account for the sample design and propensity score weights to account for nonresponse bias.

Survey methodology is an efficient and reliable form of data collection from individuals to characterize many aspects of their experiences. The main limitation to this design is that surveys do not permit probing or deep exploration of topics. Most questions will be closed-ended, so the range of possible responses must be defined in advance. Limitations will be explained in written products associated with these surveys.

Table A2. Summary of data collection activities

| <i>Instruments</i> | <i>Respondent, Content, Purpose of Collection</i> | <i>Mode and Duration</i> |
|---|--|--|
| Child care licensing administrator survey (Instrument 1) | <p>Respondents: State/territory licensing administrators</p> <p>Content: Administrators’ characteristics, perceptions of their role, and ideas for improving licensing</p> <p>Purpose: Gather information about the licensing systems, as well as administrators’ perceptions, challenges, and ideas to improve CCEE licensing systems</p> | <p>Mode: Web-based or telephone survey</p> <p>Duration: 30 minutes</p> |
| Front-line child care licensing staff survey (Instrument 2) | <p>Respondents: All front-line staff nationwide</p> <p>Content: Demographic characteristics, background and experiences, job duties, perceptions of their role, burnout, relationships with providers, and ideas for improving licensing</p> <p>Purpose: Better understand front-line licensing staff characteristics, perceptions of their roles, and job challenges</p> | <p>Mode: Web-based or telephone survey</p> <p>Duration: 30 minutes</p> |
| Child care provider survey (Instrument 3) | <p>Respondents: Licensed child care providers</p> <p>Content: Overall perceptions of the licensing system (including value and burden), availability and utility of licensing information, perceptions of licensing staff and support, perceptions about components of the licensing system (including regulations, inspections, technical assistance, training, written guidance, licensing reports), strengths and challenges of the licensing system, areas for improvement, and demographic and program characteristics</p> <p>Purpose: Understand provider perceptions of the licensing system</p> | <p>Mode: Web-based or telephone survey</p> <p>Duration: 30 minutes</p> |

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

Other Data Sources and Uses of Information

Our research questions and understanding of the gaps in the knowledge base are informed, in part, by interviews we conducted with state child care licensing administrators (OMB #0970-0356; Understanding Child Care Licensing Challenges, Needs, and Use of Data). Information we are gathering under an approved formative data collection (OMB #0970-0356; The Role of Licensing in Early Care and Education) will aid in preparation for the front-line licensing staff survey by providing information on how and when to contact front-line staff.

We may also use publicly available licensing information to understand state policies and structures which may provide context and serve as an independent variable in some analyses.

A3. Use of Information Technology to Reduce Burden

The research team will employ information technology in the form of online surveys administered through REDCap, our secure online data collection platform. Conducting surveys online will allow respondents to complete the survey on their own time and take pauses as needed, thereby minimizing respondent burden. At respondents' request, we will also conduct the surveys over the phone. In those cases, the data collector will read the questions from REDCap and enter the responses directly into REDCap. This option is designed to accommodate respondents with different levels of comfort and access to the technology, thereby increasing response rate and inclusivity.

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

The proposed surveys do not duplicate any other work being done by ACF and does not duplicate any other data sources. We consulted with the Office of Child Care (OCC) in ACF to identify topics of interest and reviewed previous research, including surveys from the 2017 Child Care Licensing Study (CCLS). The proposed child care licensing administrator survey gathers information that is a) either more detailed or more recent than what is included in the 2017 CCLS, or b) fills identified gaps in existing data (e.g., factors influencing licensing decisions). This will be the first national survey of the front-line child care licensing staff workforce. There is no nationally representative survey that examines child care provider perceptions and experiences with the licensing system. ACF's largest and most comprehensive survey of child care providers, the National Study of Early Care and Education (NSECE), does not address licensing (NSECE Project Team, 2012). A few preliminary studies have explored some provider perceptions of the licensing system, primarily using focus groups. However, the scope of those studies is quite limited because these studies are focused on identifying providers' general challenges with and motivations for being licensed and do not include specific questions about providers' experiences with the various components of the licensing system. Furthermore, existing studies employ small, state-specific samples of providers.

A5. Impact on Small Businesses

No small businesses will be impacted by the child care licensing administrator or front-line child care licensing staff surveys. Many of the licensed child care providers included in the third survey will be

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

small businesses. We will minimize the burden to licensed child care provider respondents by limiting the survey length and providing the survey in a web-based format that respondents can complete at their convenience, or over the phone at the respondent's request.

A6. Consequences of Less Frequent Collection

This is a one-time 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 this information collection activity. This notice was published on August 23, 2022 (87 FR 51677) and provided a sixty-day period for public comment. During the notice and comment period, one comment was received, which is attached (see Appendix F).

The comment in response to the sixty-day public comment period came from the Chief Academic Officer of a large network of center-based CCEE providers. They provided detailed suggestions regarding the provider survey, many of which we had already planned. For instance, to minimize burden on respondents, they requested that we use an online data collection platform and that most questions be multiple choice. We were already planning both of those strategies. Additionally, they suggested that the sample of center-based providers be larger than 1,000 because they were concerned that 1,000 was not sufficient to represent the diversity of programs nationwide. As described in Part B2, we selected that sample size in consultation with internal and external sampling experts and think that 1,000 centers, along with an oversample in small states, will be sufficient to create national estimates and look for associations between state-level policies and providers' perceptions of the licensing system. Additionally, as described in Part B5 and B6, we plan several statistical checks and statistical adjustments (if needed) to ensure that our sample meets the project's goals. This commentor also suggested that we add a survey of CCEE providers who closed permanently during the COVID-19 pandemic. We agree this would be an interesting and important group to survey, but it is outside the scope of the TRELCE project.

This same commentor provided five suggestions for additional survey content and analysis. We think our current content and analysis plans address most of their suggestions:

- 1) They suggested that we probe variation in state policies and how they affect providers. That type of analysis is planned (see Part B7).
- 2) They suggested that we investigate ways in which states collaborate with providers to set requirements. Though not specifically about setting requirements, we have questions regarding

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

collaboration in both the provider (see questions 5 and 6 on Instrument 3) and administrator surveys (see question 50 and 51 on Instrument 1).

- 3) They suggested that we ask providers the extent to which determining noncompliance is based on the risk the violation(s) pose to children's health and safety. That is not a topic we probe in our provider survey but is addressed in the administrator survey (see question 17 on Instrument 1).
- 4) This commenter suggested exploring the extent to which technological adaptations are discouraged by licensing. We are not aware that this is a pressing issue in child care licensing (and this topic was not mentioned as a priority during previous reviews of the instruments) so we have not included specific questions about this topic. Our open-ended questions will allow providers to bring up any concerns that we have not addressed in our closed-ended questions.
- 5) Finally, they suggested that we solicit feedback regarding training mandates. We do ask providers how reasonable they think the training requirements are (see question 4c on Instrument 3) and the accessibility of required trainings (see questions 4d and 4e in Instrument 3).

Materials were posted on October 22, 2022 (ICR Ref. No. 202210-0970-014) for a 30-day period for public comment. During this period, 5 early childhood organizations, 1 union, and 2 individuals provided comments (see Appendix G). Comments addressed a range of topics including recruitment, sampling, methods, as well as suggestions about each of the three surveys. Much of the comments were about the licensed provider survey. The comments highlight the importance of this new data collection effort and the interest in the broader field about the work, particularly in gathering information from providers about their experiences with the licensing system. See Appendix H for our response to comments.

Consultation with Experts Outside of the Study

We worked with the TRLECE technical expert panel for guidance as we designed all aspects of these surveys. We also invited a separate panel of state licensing staff to provide advice and guidance about instruments, procedures, and interpretation of findings. This was especially important given that this is a new area of research. For each activity, fewer than 10 experts were engaged in these reviews. Additionally, OCC reviewed the instruments to help identify improvements to each survey that would facilitate broader use of the data.

A9. Tokens of Appreciation

The research team will provide a \$25 token of appreciation to licensing administrators and front-line staff who complete the 30-minute survey. We will send an initial \$5 prepaid mailed gift card to licensed child care providers, followed by an additional \$20 gift card for completing the 30-minute child care provider survey. These tokens of appreciation are part of a larger plan intended to increase our response rate and address nonresponse bias (see Supporting Statement Part B5). Previous research has shown that tokens of appreciation improve survey response rates regardless of modality (i.e., web, mail, phone) and can help mitigate nonresponse bias, particularly from minority and low-income respondents (Singer & Ye, 2013).

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

Further, prior research has found that prepaid tokens of appreciation for surveys, followed by an additional token of appreciation post-survey completion, can be more effective in increasing response rates and addressing nonresponse bias than only providing a post-completion gift card (Mercer et al., 2015; Singer et al., 2013). This finding was supported in a recent survey of child care staff. As part of the Assessing the Implementation and Cost of High Quality Early Care and Education (ICHQ) project, Albanese, Edwards, Weiss, and Gonzalez (2022) conducted an experiment to assess the effect of prepaying a portion of the token of appreciation on response rates. They found that giving a portion of the token amount with the initial request prior to survey completion increased the response rate among child care staff by 20 percentage points compared to giving the total amount after completion. For the current project, this strategy is only feasible for the provider survey because it is the only one that will involve outreach by mail. We cannot email gift cards to individuals prior to their participating in the survey because emailing gift cards requires sharing email addresses with a third-party (e.g., Amazon) and we cannot ethically do that without their consent.

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

Personally Identifiable Information

We will use publicly available contact information for the child care licensing administrator survey and front-line child care licensing staff survey. For the front-line child care licensing staff survey, in most states, the research team will collect the names and contact information (work telephone numbers and work email addresses) from state licensing administrators. (See Supporting Statement Part B4 for the recruitment plan for states that cannot share contact information.) For all surveys, email addresses will be associated with survey responses initially to track who has completed the surveys and thus, who needs a follow-up reminder. All PII will be removed once data collection is complete.

For all three surveys, during data collection, participants will complete the survey using an online platform, REDCap. The information in REDCap, including participants' contact information, is hosted on a FedRAMP compliant Microsoft Azure Server. Once data collection is complete, PII will be removed and the data will be downloaded into a dataset stored on Child Trends' secure server. Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by personal identifiers.

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, that their participation is voluntary, and that their information will be kept private to the extent permitted by law. The Contractor will comply with all Federal and Departmental regulations for private information. The research team has obtained Institutional Review Board approval for all aspects of these surveys including recruitment, data collection, and analysis processes.

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

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' Personally Identifiable Information (PII). As is described in our Data Security Plan, during data collection all PII and data will be stored in REDCap, our secure online data collection and management platform, hosted on a FISMA compliant Microsoft Azure Server. For analysis of the open-ended questions, data will be uploaded into Dedoose, a FedRAMP and NIST 800-53 compliant data analysis package. 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 Information³

We will not collect sensitive information in these surveys.

A12. Burden

Explanation of Burden Estimates

To estimate the burden for the front-line child care licensing staff and child care provider surveys, the project team piloted each survey with fewer than ten individuals. Each survey will take no more than 30 minutes to complete. As explained in Supporting Statement Part B5, there are a total of 56 state child care licensing administrators nationwide and we anticipate an 86% response rate, so are assuming 48 will respond. For the survey of front-line child care licensing staff, we believe the population is roughly 3,000 individuals and we anticipate a 55% response rate, so are assuming 1,650 will respond. For the child care provider survey, we plan to continue recruiting providers until we have roughly 2,000 responses.

Table A12 summarizes our burden estimates for the proposed instruments.

Estimated Annualized Cost to Respondents

The estimated annual cost to respondents is shown in Table A12. The mean hourly wage for each respondent type is based on information from the Bureau of Labor Statistics, Occupational Employment and Wages, May 2021.

³ 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.

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

- For licensing administrators, the mean hourly wage of \$40.80 was used, based on the wage for state government, excluding schools and hospitals, “Education and Childcare Administrators, Preschool and Daycare: Child Day Care Services” (<https://www.bls.gov/oes/current/oes119031.htm>).
- For front-line staff, the mean hourly wage of \$26.66 was used, based on the wage for “Community and Social Service Specialists: State Government, excluding schools and hospitals” (<https://www.bls.gov/oes/current/oes211099.htm>).
- For child care providers, the mean hourly wage of \$24.25 was used, based on the wage for child day care services “Education and Childcare Administrators, Preschool and Daycare: Child Day Care Services” (<https://www.bls.gov/oes/current/oes119031.htm>).

The total estimated annual cost amount is \$47,223.70.

Table A12. Estimated Annual Burden and Cost

| Instrument | No. of Respondents (total over request period) | No. of Responses per Respondent (total over request period) | Avg. Burden per Response (in hours) | Total/Annual Burden (in hours) | Average Hourly Wage Rate | Total/Annual Respondent Cost |
|--|--|---|-------------------------------------|--------------------------------|--------------------------|------------------------------|
| Child care licensing administrator survey | 48 | 1 | 0.50 | 24 | \$40.80 | \$979.20 |
| Front-line child care licensing staff survey | 1650 | 1 | 0.50 | 825 | \$26.66 | \$21,994.50 |
| Child care provider survey | 2000 | 1 | 0.50 | 1000 | \$24.25 | \$24,250.00 |
| Total | | | | 1,849 | | \$47,223.70 |

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

The total/annual costs for the data collection activities under this current request will be \$785,191. This includes direct and indirect costs of data collection.

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

| Cost Category | Estimated Costs |
|---|------------------------|
| Data Collection | \$378,375 |
| Analysis | \$202,479 |
| Publications/Dissemination | \$204,337 |
| Total/Annual costs over the request period | \$785,191 |

A15. Reasons for changes in burden

This is a new information collection request.

A16. Timeline

Table A16. Study timeline

| Task | Months After OMB Approval |
|---|-------------------------------------|
| Begin recruitment for at least one survey | Within 1 month |
| Data collection | Months 1 through 5 (5-month window) |
| Data analysis | Months 6 through 7 (2-month window) |
| Draft report | Months 8 through 9 (2-month window) |
| Final report | Months 10 -14 (4-month window) |

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Instrument 1: Child care licensing administrator survey

Instrument 2: Front-line child care licensing staff survey

Instrument 3: Child care provider survey

Appendix A: Recruitment of child care licensing administrators

Appendix B: Recruitment of front-line child care licensing staff

Appendix C: Recruitment of child care providers

Appendix D: Letter of Support from OCC

Appendix E: Project flyer for licensing administrators

Appendix F: Federal Register Comment received after 60-day period for public comment

Appendix G: Federal Register Comments received during 30-day period for public comment

Appendix H: Response to comments received during 30-day period for public comment