

## Appendix H. TRLECE Response to 30-Day Period for Public Comment

The TRLECE team received comments from eight organizations/individuals during the 30-day public comment period. Some comments were similar across entities, so we have summarized them by topic. We considered the following factors when reviewing comments and considering revisions:

- We do not want to increase the burden for any respondent type.
- We cannot add new constructs to the surveys or make other changes that would trigger re-review by the Immediate Office of the Assistant Secretary (IOAS) in the Administration for Children and Families.
- We need to attend to the project purpose and study priorities identified by the Office of Planning, Research, and Evaluation; Office of Child Care; and the project’s Technical Expert Panel.
- We need to ensure that the study can be completed within the project resources and timeline.

We have organized the comment topics/themes into three categories: sample, procedures, and survey content. At the beginning of our response to each comment, we note one of three responses:

1. *Addressed*: This denotes issues that the team already included in our original study plans as well as changes made in response to comments.
2. *Partially addressed*: For some comments, we were able to address some, but not all, aspects of the suggestion.
3. *Not addressed*: Due to factors noted above, we were not able to address some comments.

Table H-1. Comment Topics/Themes and TRLECE’s Responses

Comment Topic or Theme	TRLECE Response
<b>Sample</b>	
Include license-exempt providers in the sample of providers and add relevant survey questions (e.g., their plans to become licensed).	<p><i>Partially addressed.</i></p> <p>The purpose of the provider survey is to learn about the experiences and perceptions of licensed providers, so expanding the sample and adding questions to include license-exempt providers would be beyond our scope.</p> <p>We agree that it is important to learn more about licensing’s interactions with license-exempt providers. We have included a few questions on this topic in the licensing administrator survey and added a few more response options to better address license-exempt providers. Additionally, we are conducting a small case study to examine how a few state licensing teams monitor and support license-exempt providers.</p>
Intentionally include licensing staff who work with school-age providers as well as licensed providers who work with school-	<p><i>Partially addressed.</i></p> <p>The study will rely on a random sample of licensed providers. We expect that our sample will include providers who serve school-age children. Further, we are asking providers which age groups</p>

Comment Topic or Theme	TRLECE Response
age children.	they serve, so future researchers could look at school-age providers separately, if the final sample is large enough. Because the team plans to invite all front-line licensing staff to participate in the survey, we expect to include staff who work with school-age providers. Thus, the sample of providers and front-line licensing staff will include those who work with school-age children.
Ensure a representative sample of small and large family child care providers.	<i>Not addressed.</i> The primary purpose of the provider survey is to understand the experiences and perceptions of licensed providers. This national survey includes providers from two major types of settings: centers and family child care homes. For this study, we are not focused on subgroups of family child care providers (e.g., small vs. large). Additionally, states vary in whether (and how) they designate small vs. large family child care providers, which would make sampling difficult. For these reasons, we are not adjusting our sampling procedures, although both large and small family child care providers will be included.
<b>Procedures</b>	
Translate the surveys into languages other than English.	<i>Addressed.</i> The team is translating provider and administrator study materials and instruments into Spanish. We are not translating the front-line staff study materials and instruments into Spanish because we are only including front-line staff in the 50 states and DC (not the territories), and we think that all front-line staff will have to speak English.
Engage family child care providers in all stages of the study.	<i>Addressed.</i> TRLECE has engaged a range of experts as part of its Technical Expert Panel to provide input on various aspects of the study. This has included individuals who work closely with family child care providers or who were formerly family child care providers.
Use various strategies to increase the likelihood that providers participate.	<i>Addressed.</i> The team has allocated staff to help recruit providers, developed the survey so that it can be completed on a smartphone as well as tablet or PC, give providers the option to complete it over the telephone, and will offer providers a small token of appreciation (both with the initial outreach and after providers respond). We have also reviewed the instruments to ensure that they use plain language and are at a reasonable reading level (i.e., 8 <sup>th</sup> grade or lower).
Note in the recruitment materials that provider	<i>Addressed.</i> The recruitment materials address the issue of confidentiality; no

Comment Topic or Theme	TRLECE Response
responses are confidential and will not be shared with licensing agencies or other state entities.	changes are needed.
Oversample to ensure that respondents reflect diversity of the child care field. Disaggregate provider response data by setting and race/ethnicity to explore possible inequities. Add questions to better understand possible inequities in the licensing system.	<p><i>Partially addressed.</i></p> <p>We are stratifying the sample by provider type (centers vs. family child care home) and plan to report findings separately by setting type. We cannot use race/ethnicity to create the sample because we do not have that race/ethnicity information for all providers in the US. We will however, disaggregate the findings by race/ethnicity, to the extent the sample sizes are appropriate.</p> <p>We agree with the importance of studying possible inequities within licensing and have included questions about the perceived fairness of the system in the provider questionnaire. Additionally, as part of the larger TRLECE project, we have already begun exploring possible inequities through secondary analysis of administrative data.</p>
Conduct follow-up focus groups or interviews to gather more details from survey participants.	<p><i>Not addressed.</i></p> <p>Although we agree that qualitative data collection would enrich the study, this is outside the scope of work for this project; the contract period of performance does not include enough time to do this.</p>
Work with local organizations to recruit providers to complete the survey.	<p><i>Not addressed.</i></p> <p>Because we are randomly sampling providers—and the sample will include a small proportion of providers from each state—this is not an appropriate recruitment strategy. It would be a breach of confidentiality to share the names of selected providers with outside organizations and broad outreach to all providers is unlikely to reach those who were randomly selected. This would be more appropriate if we were sampling providers within a particular community or asking all interested providers to complete the survey.</p>
<b>Survey Content</b>	
Add questions or response options that are appropriate for licensed providers serving school-age children.	<p><i>Addressed.</i></p> <p>We appreciated the comments underscoring the importance of better understanding licensed providers who serve school-age children. In response, to the extent possible—without adding to the burden and without triggering an IOAS re-review of the instruments—we have added questions and adjusted response options in all three surveys to gather information about licensed providers who serve school-age children (e.g., school-age qualifications, previous experience, professional development</p>

Comment Topic or Theme	TRLECE Response
	related to specific age groups).
Add questions or response options that address other topics related to licensing.	<p><i>Partially addressed.</i></p> <p>The instruments already address many of the topics requested in the comments (e.g., burden of being licensed, relevance of licensing regulations to family child care providers, training). We added some suggested topics (e.g., provider understanding of their rights in the licensing process, provider referrals to afterschool networks). In order to stay within the project scope and prevent the surveys from getting too long or triggering re-review from IOAS, we did not include some of the suggested topics (e.g., licensing waivers, barriers to becoming licensed). Respondents may provide information on these or other topics that they deem important through the open-ended questions at the end of each survey. In response to the comments, we added an open-ended question to the provider survey that asks about useful licensing supports.</p>
Add demographic questions about disability status and sexual orientation.	<p><i>Not addressed.</i></p> <p>While these are important, the TRLECE Technical Expert Panel suggested minimizing the number of demographic questions in the surveys. Thus, we included other, higher priority demographic questions and omitted questions on these two topics.</p>