

## **Appendix F**

### **Comments received on 60-day Federal Register notice**

# CLASP

The Center for Law and Social Policy

Administration for Children and Families  
Office of Planning, Research, and Evaluation (OPRE)  
Mary E. Switzer Building  
330 C Street, S.W.  
Washington, DC 20201

## **RE: Comments on “Proposed Information Collection Activity; Home-Based Child Care Practices and Experiences Study (New Collection)”**

The Center for Law and Social Policy (CLASP) is grateful for the opportunity to comment on the recent notice of “Proposed Information Collection Activity; Home-Based Child Care Practices and Experiences Study (New Collection).” CLASP is a national, non-partisan, anti-poverty organization that has advocated for policy solutions that support the needs of people with low incomes for over 50 years. We develop practical yet visionary strategies for reducing poverty, promoting economic security, and advancing racial equity. CLASP works at the federal, state, and local levels and has deep expertise in child care and early education, postsecondary education, and job quality policies, including those that impact the early childhood education workforce.

CLASP commends the Office of Planning, Research, and Evaluation (OPRE) and the Administration for Children and Families (ACF) for looking into this important issue and making space for those who are closest to the issue to contribute to and influence the project. At CLASP, we have a developing portfolio of work on equitable data practices in early care and education and believe that much of the work we have done can be of value to the work ACF is pursuing. Based on this work and other knowledge and work from across our organization, we offer the following comments to reflect the department’s specific requests:

- 1. (a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility;**
  - a. At CLASP, we see family, friend, and neighbor (FFN) care as a critical component of the child care system—to meet the needs of families and, in many cases, match their preference with someone they have an established relationship with and know and trust. While all home-based child care providers’ voices are important in shaping ACF’s work, those who are license-exempt—commonly known as FFN care providers— have particularly unique experiences that often are left out of the conversation of how to best support providers and meet family need. Therefore, by centering them in this proposed information collection, the findings will indeed not only be of practical utility to the agency’s work but also crucial to helping ensure equity across provider types in accessing supports and resources that are tailored to their diverse needs in providing quality care for young children. In addition to information collected from home-based providers, including families and community members further serves the function of the agency given that all three groups are significantly impacted by the mission and work of the agency. Incorporating the voices of all those impacted is vital to creating the range of solutions that will work the best based on the specific needs of unique provider types and the communities they serve.

2. **(b) the accuracy of the agency's estimate of the burden of the proposed collection of information;**
  - a. Since this study is to be done virtually, participants may be impacted by a variety of factors that affect how burdensome and time consuming the process may be; even outside of the direct engagements with the information collection process. These factors can include differing levels of knowledge on and access to technology use, varying reliability of internet access, challenges managing the interview in the home environment which is often their work environment, and other related factors. As a result, it is hard to make an accurate assumption of the actual burden. Furthermore, it may be beneficial to consider engaging with additional providers beyond the 60 outlined in the request for public comments and do more than one round of data collection to ensure a robust number of diverse experiences are recorded. If the number of respondents and rounds of data collection are increased, the total time burden for the agency will increase too.
3. **The quality, utility, and clarity of the information to be collected;**
  - a. To ensure the quality, utility, and clarity of the information to be collected, the participants and their experiences must be centered throughout the entire process. This includes informing them of the methods and purpose of screening, creating clear and relevant interview questions, deciding what types of collections are useful or noting any additional time burden, etc. By doing this across the whole process, the participants are more likely to provide information that is of quality because they will understand the value of sharing their experience and time and the need to bring clarity and transparency about their experiences. It is also important that they understand how, and can have the opportunity to contribute to what, this information would look like in future home-based—and broader child care—research, policy creation and implementation, as well as efforts to strengthen quality improvement to better align with their needs. In addition, to ensure the quality and utility of the information to be collected, there must be intentional efforts to engage providers, families, and community members who speak a variety of languages. [FFN providers are heavily relied on by immigrant and dual language learning families](#) due to the reduced costs, flexibility of scheduling, and access to culturally and linguistically appropriate care options. Including FFN providers is crucial to capturing the full range of experiences within home-based care and supporting language access through the respondents first/preferred language will help ensure equitable access to the opportunity to share those experiences.
  - b. Because of the time commitment this data collection will require and because of the value of their unique expertise through sharing their personal experience, we would encourage the agency to pay providers, families, and community members for their time in engaging in this process. Many FFN providers receive low wages or no payment at all and asking them to share their experience for free is disrespectful. Paying people for their time is a way to show that their time and knowledge are valued and recognizes the opportunity cost of taking that time away from their work, family, and other personal responsibilities.

**4. and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.**

- a. As mentioned in response to the question about burden, participants may be impacted by a variety of factors including differing levels of knowledge on and access to technology use, varying reliability of internet access, challenges managing the interview in the home environment which is often their work environment, and other related factors that impact how burdensome and time consuming the process may be even outside of the direct engagements themselves. These burdens can be addressed and/or minimized by centering the participants and their needs throughout the process.

Practically, this can be done in a variety of ways:

- i. By ensuring participants are connected to reliable internet and providing it if they are not.
- ii. By ensuring participants have the necessary technology implements, such as a phone or computer, to participate in the interview.
- iii. By ensuring participants have clear instructions for how to access the technology needed to participate in the interviews and screenings and ample time to review the instructions and test the technology ahead of the interview.
- iv. By conducting the interview at times that are convenient for the participants which may be outside of normal business hours.
- v. By compensating participants for their time.

**Additionally, we have the following general comments:**

In recruiting providers, families, and community members to participate, there should be careful consideration for oversampling to ensure the selected individuals and the pool of responses accurately reflects the diversity of the child care and early education field. This diversity should reflect a range of participant characteristics such as: race/ethnicity, primary language, geography, etc. Likewise, we know that the child care and early education workforce, disproportionately made up of women of color and immigrant women, is plagued with inequities that deeply impact them. Therefore, disaggregating data, by factors such as race and gender identity, would be beneficial in identifying how these inequities may exist in the FFN space. However, it is important to ensure that responses are not identifiable to ensure the privacy of respondents. If participants are randomly recruited, there may be individuals whose first language is not English. If they are more comfortable participating in a different language, they should have access to translated materials and an interpreter to support the interview.

As mentioned above, these recommendations stem from our existing work on data equity and knowledge of the child care and early education system. It is well known that data collection, analysis, and dissemination can be powerful tools to improve systems within the child care and early education field, but these data processes were created within the same systems, institutions, and structures that have been shaped by the historic and present impacts of white supremacy and systemic racism. With this in mind, CLASP has highlighted the critical inclusion of equitable community engagement strategies in quantitative, qualitative, and mixed method approaches. This includes centering the experiences and expertise of those who are most directly impacted by—yet most often excluded from—the processes to collect and analyze data as well as the resulting policies and resources determined by those data.

Therefore, we commend you on the intentional inclusion of FFN providers and their experiences, along with those of the families and communities they serve, to support the work you do.

In our work, we have identified the following best practices for inclusive and equitable data processes that incorporate equitable community engagement frameworks through expanded data strategies that we would like to share.

- Analyze data with the intention of understanding inequities;
- When possible, disaggregate data to honor and unpack the trends and experiences of different groups; when it is not possible, consider whether there are other types of information that can be used to honor and distinguish the varied experiences across groups;
- Create space to shift power and allow those who are most directly impacted—and potentially harmed—to lead in defining the problem, designing the solutions, and during implementation;
- Involve directly impacted people/communities—particularly those who have been mislabeled as difficult to reach—not just as a source of information gathering, but also in developing data strategies including constructing survey questions, creating outreach strategies, interpreting and organizing qualitative responses, etc.
- Respectfully partner with community-based connectors and organizing entities from the communities of interest to build trust and authentic reciprocal relationships; and
- Ensure that the results of the research can be accessed by and are useful to the communities from where the research was collected as well as those who may be directly impacted by policy changes based on that research.

For a deeper discussion of these issues, CLASP recommends our 2021 paper, [Shaping Equitable Early Childhood Policy: Incorporating Inclusive Community Engagement Frameworks into Expanded Data Strategies](#), by Alycia Hardy and Alyssa Fortner. Although this paper was written broadly regarding improving data practices, the overall framework and many of the recommendations and resources included could be relevant for this proposed information collection activity.

Thank you for the consideration of these comments. We would be happy to discuss these recommendations with you or the contractors conducting this project. If you have any further questions, please contact Alycia Hardy at [ahardy@clasp.org](mailto:ahardy@clasp.org).

---

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 January 17, 2023, Volume 88, Number 10, pages 2628-2629, and provided a sixty-day period for public comment. **The ACF Office of Planning, Research and Evaluation (OPRE) received one comment.**

***Response to Public Comment***

OPRE received a public comment from CLASP, a non-partisan, anti-poverty organization that has expertise in child care and early education, postsecondary education, and job quality policies, including those that impact the child care and early education workforce. The organization commended OPRE for the proposed information collection’s focus on family, friend, and neighbor (FFN) care, noting that FFN care is a critical component of the child care and early education system. The organization emphasized that FFN providers have been the focus of less research than providers of other types of child care and early education and therefore the findings from this proposed information collection have the potential to “be of practical utility to the agency’s work but also crucial to helping ensure equity across provider types in accessing supports and resources that are tailored to their diverse needs in providing quality care for young children.” The organization also commended the project’s inclusion of families and community members in our data collection plans, noting that families and communities are “significantly impacted by the mission and work of the agency.”

The organization commented on several aspects of the proposed information collection. OPRE responds to each comment in the sections below. OPRE has not made revisions to the proposed information collection activities in response to the public comment.

**Burden of the proposed collection of information and accessibility of the methods**

The organization noted that virtual information collection may impact providers’ ability to participate. OPRE acknowledges that factors including “differing levels of knowledge on and access to technology use, varying reliability of internet access, challenges managing the interview in the home environment which is often their work environment, and other related factors” may impact providers’ ability to participate in the information collection and considered these factors when designing the information collection. Given this, OPRE is taking several steps in the proposed study procedures to ease the burden for providers, including: (1) lending providers study phones with access to cell service, (2) offering training on the technology (Instrument 3) and ongoing technical assistance; and (3) offering to conduct telephone interviews at times convenient for providers including evenings and weekends.

When developing the instruments, OPRE also took several steps to reduce burden by ensuring the instruments included questions that are clearly worded and easy to understand by participants, and that the instruments are streamlined and reduce unnecessary repetition. OPRE received input on the instruments from representatives of community organizations who work with FFN providers, as well as input from researchers with expertise in HBCC and qualitative study methods.

OPRE also conducted an extensive pre-test to both gather input from providers, families, and community members on the instruments and to test the information collection procedures, including the process of lending providers’ cell phones. Information from the pretest informed the proposed procedures and the burden estimates. The pretest was conducted with 7 providers, 3 family members, and 3 community members.

- 
- During a first phase of the pretest, OPRE asked 3 providers to test the photo and audio journal instruments (Instruments 4 and 5) only given that this aspect of information collection is unique and involves multiple logistics. These logistics include shipping study cell phones to providers; conducting a telephone call to review with providers instructions for using the study tools (provider logistics call; Instrument 3) during which they receive training on the cell phone and application used for collecting photos and audio journals; providing technical assistance as needed to providers to assist in their responses to the photo and audio journals; receiving a prepaid shipment with the study cell phone back from providers.
  - OPRE then pretested the full set of instruments and study processes with 4 other providers in a second phase of the pretest. These providers participated in the provider screener (Instrument 1), provider interview #1 (Instrument 2), and provider interview #2 (Instrument 6). Interviewers engaged providers to identify and recruit families and community members for the pretest. Interviewers then conducted interviews with 3 family and 3 community member (Instruments 7 and 8) who were identified by providers.

In the pre-test, the research team engaged FFN providers, families, and community members as experts in cognitive interviews to ask them to reflect on the questions and prompts in the instruments. During interviews, these experts were asked to provide feedback on the clarity and relevance of the interview questions; they were also asked to provide feedback on how they felt answering the questions. Participants were also asked to reflect on the process and procedures of participating in the pre-test, including the extent to which the study activities led to additional burdens and if any of the processes were beneficial. Findings from the pretest led to substantial updates to the study instruments and procedures.

### **Centering the experiences of study participants throughout the information collection**

*Value of study participation.* The organization noted that participants are more likely to provide information that is of quality if they understand the value of sharing their experience and time. OPRE is in full agreement and is taking multiple steps to inform providers of the methods and purpose of the information collection. First, OPRE is partnering with trusted community partners to recruit providers; we are providing trusted partners with detailed information about the study so they can share it with providers; these same trusted partners reviewed and provided input on the study instruments. In addition, OPRE will share this information directly with providers during the screening call (Instrument 1) and again at the start of each data collection activity. At the conclusion of data collection, the study will invite providers to a focus group where we will share initial findings and ask providers for their reactions and input. Representatives from community organizations will also be invited to learn about the study findings and share their reflections and interpretations of the study findings at the conclusion of data collection.

*Representation of language diversity.* The organization commented on the importance of engaging providers, families, and community members who speak a variety of languages. For this information collection, OPRE has developed data collection procedures in Spanish (including translated materials and interviews conducted by bilingual interviewers). The project is unable to offer other languages because of resource constraints.

*Tokens of appreciation.* In line with the recommendation from the organization, OPRE plans to offer tokens of appreciation to participants (including providers, families, and community members).

---

*Journaling to minimize intrusiveness of study.* The use of photo and audio journals will allow participants to collect data in their own time without the intrusion or judgment of an external researcher. In this way, OPRE is utilizing participatory methods to elevate the experiences of research participants and to give them agency in the research process. Participants will also have an opportunity to say what they think the important themes are from the discussion at the end of each interview. They will have another opportunity to offer feedback and interpretations of the study's preliminary findings in a focus group discussion after data collection is completed. However, beyond these methods, OPRE is not able to engage in full participatory research due to timeline and resource constraints.

### **Ensuring a diverse sample**

The organization noted that in order to ensure a diverse sample, "it may be beneficial to consider engaging with additional providers beyond the 60 outlined in the request for public comments and do more than one round of data collection to ensure a robust number of diverse experiences are recorded." OPRE purposively selected study sites in four states to ensure geographic diversity, to represent a range of policy contexts relevant for home-based child care (including child care licensing thresholds (numbers of children allowed in home-based child care settings), policies on subsidy eligibility, and participation of FFN providers in Quality Rating and Improvement Systems), to increase the likelihood of a range of participant characteristics (such as race and ethnicity and primary language), including providers who are more likely to live in under-resourced communities. OPRE plans to engage up to 120 providers over the study period of six months in order to reach our goal of having complete data for 60 providers. While a diverse sample is one of the goals of the study data collection plan, OPRE is unable to increase the number of providers recruited to more than 120 nor to do more than one round of data collection due to resource and timeline constraints.

### **Analyze data with the intention of understanding inequities**

Analyses will focus on the study's guiding questions, and methods will vary based on the guiding question. For example, for the guiding question about sources of knowledge and support, the team will use the categories of support described by providers as well as data from community member interviews to better understand the types of supports that FFN providers prioritize. Across guiding questions, the study will also explore themes by participant characteristics. The study will also explore different profiles of FFN providers based on the ways they describe their caregiving, perceptions of quality, and sources of support. For example, some providers might use a family-based perspective in describing their work, while others might use more of a school-based framework. Examples of within-person narratives that combine photo, journal, and interview data from providers and interview data from family and community members would be used to illustrate these different approaches to child care.

### **Ensure that the results of the research can be accessed by and are useful to the communities from where the research was collected**

As discussed previously, providers who participate in the study will be invited to participate in a focus group to learn about preliminary findings, provide feedback and their interpretations of the study's findings. Representatives from the community organizations at each study site will also be invited to learn about study findings. While still finalizing plans for disseminating study findings, OPRE is considering ways to make study findings accessible to FFN providers, among other audiences.