

Supporting Statement for Paperwork Reduction Act Submissions
Study of Child Care in Public Housing:
PHA and ECE Center Interviews Data Collection
(OMB# 2528-New)

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Consolidated Appropriations Act, 2021, enacted on December 27, 2020, Pub. L. 116-260, authorizes the U.S. Department of Housing and Urban Development (HUD) to pursue a “collaboration with the Department of Health and Human Services (HHS) to better prioritize or promote on-site child care supportive services for HUD-assisted Families.” To address this charge, HUD seeks to understand the early care and education (ECE) needs and preferences of families living in public housing developments,¹ in addition to the accessibility of ECE for those families, including their use of ECE programs co-located within their public housing development. The study will explore (1) ECE program access for families living in public housing developments, including any supports received for identifying or enrolling in ECE; (2) the availability of ECE programs in proximity to public housing developments, including co-located programs; (3) the operation of co-located public housing developments and ECE programs; and (4) the ECE needs and preferences of families living in public housing developments. For this study, *ECE* refers to the range of child care options for children younger than 13 years old and may include formal center-based programs, home-based programs, and informal care options.

Experiencing housing instability early in life can have negative and long-lasting effects on children’s health, development, and well-being.² However, research has found that high-quality ECE can mitigate some of these impacts.³ Developing strategies for affordable housing and ECE is an important lever for supporting families’ well-being, but both housing and ECE systems are underfunded and fragmented.^{4,5} ECE programs can be a resource and support to families, enabling

¹ Public housing developments are defined as public housing owned by public housing agencies that are not scattered sites. Meaning, the public housing units are centrally located within a small geographic area.

² Fantuzzo, J. W., LeBoeuf, W. A., Chen, C. C., Rouse, H. L., & Culhane, D. P. (2012). The unique and combined effects of homelessness and school mobility on the educational outcomes of young children. *Educational Researcher*, 41(9), 393-402.

³ U.S. Department of Health and Human Services, Administration for Children and Families. (2010). Head start impact study. <https://www.acf.hhs.gov/opre/report/head-start-impact-study-final-report-executive-summary>

⁴ Lloyd, C.M., Shaw, S., Alvira-Hammond, M., & Hazelwood, A. (2021). Racism and discrimination contribute to housing instability for Black families during the pandemic. *Child Trends*. <https://www.childtrends.org/publications/racism-and-discrimination-contribute-to-housing-instability-for-black-families-during-the-pandemic>

⁵ Lloyd, C.M., Carlson, J. & Logan, D. (2021). Federal policies can address the impact of structural racism on Black families’ access to early care and education. *Child Trends*. <https://www.childtrends.org/publications/federal-policies-can-address-the-impact-of-structural-racism-on-black-families-access-to-early-care-and-education>

parents to attend work or school⁶ and providing educational experiences for children that have the potential to put them on a course for later academic success.³ ECE programs have demonstrated positive effects on the physical, cognitive, and social-emotional development of children,⁷ and these effects are even more profound for children experiencing housing instability.⁸ However, we know very little about the ECE needs and preferences of families living in public housing developments.⁹

The Public Housing Child Care Demonstration Program was funded under Section 117 of the Housing and Community Development Act of 1987 to explore whether increasing access to ECE by co-locating these programs with public housing developments facilitated educational or work stability for families living in these developments. Findings from the demonstration program suggested that overall, co-locating ECE in public housing benefited families in many ways, with 90% of those sponsoring demonstration sites reporting that the ECE programs had a positive impact on families' employment, including supporting families with seeking education, training, and finding jobs.¹⁰ To date, there has not been another comprehensive study of the co-location of ECE and public housing.

In summary, there is limited research and understanding about the ECE needs and preferences of families living in public housing developments, and about how accessible ECE programs are to families. The reason for this lack of research and understanding is, in part, the way data for these programs are collected, resulting in numerous analytic and methodological challenges for researchers, policy makers, and practitioners. The current proposed study looks to bridge these gaps and present options for HUD and HHS to improve ECE access, especially for families living in public housing developments.

⁶ Glynn, Farrell, & Wu (2013). The importance of preschool and child care for working mothers. *Center for American Progress*. <https://www.americanprogress.org/article/the-importance-of-preschool-and-child-care-for-working-mothers/>

⁷ Elango, S., García, J. L., Heckman, J. J., & Hojman, A. (2015). Early childhood education. In *Economics of Means-Tested Transfer Programs in the United States*, Volume 2 (pp. 235-297). University of Chicago Press.

⁸ Perlman, S. M., Shaw, S. H., Kieffer, C. H., Whitney, G. A. C., & Bires, C. (2017). Access to early childhood services for young children experiencing homelessness. *Child and Family Well-Being and Homelessness: Integrating Research into Practice and Policy*, 65-82.

⁹ Rice, D., Schmit, S., & Matthews, H. (2008). Child care and housing: Big expenses with too little help available. *Evaluation*, 19(2), 367-412.

¹⁰ Sextant Consultants, Inc. (1992). Public Housing Child Care Demonstration Program. Program assessment: First round. *U.S. Department of Housing and Urban Development*. https://www.huduser.gov/portal/publications/pubasst/pub_hsg_dem_first_rnd.html

This submission requests OMB approval for the following data collection activities:

Item in the Appendix	Title	Description	OMB Review and Approval Required	Supporting Documentation Only
Appendix A	Appendix A_IRB_Approval	IRB approval letter		X
Appendix B	Appendix B_Family Consent Form	Consent Form for families living in public housing developments	X	
Appendix C	Appendix C_Constituent Consent Form	Consent form to be administered to key constituents	X	
Appendix D	Appendix D_Housing Constituents Interview Protocol	Data collection protocol for interviews with housing constituents	X	
Appendix E	Appendix E_CCRandR Administrators Interview Protocol	Data collection protocol for interviews with child care resource and referral centers	X	
Appendix F	Appendix F_CCDF State Administrators and HSCO Directors Interview Protocol	Data collection protocol for interviews with Child Care Development Fund (CCDF) State Administrators and Head Start Collaboration Office (HSCO) Directors	X	
Appendix G	Appendix G_CoLocated ECE Program Directors Interview Protocol	Data collection protocol for interviews with Co-located ECE Program Directors	X	
Appendix H	Appendix H_Family Interview Protocol	Data collection protocol for interviews with families	X	

2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

This is a new data collection. This study seeks to explore (1) ECE access for families living in public housing developments, including any supports received for identifying or enrolling in ECE; (2) the availability of ECE programs in proximity to public housing developments, including co-located programs; (3) the operation of co-located public housing developments and ECE programs; and (4) the ECE needs and preferences of families living in public housing developments. To address these questions primary qualitative data will be collected during case studies in six sites. Data collection will include interviews with key constituents and families, as described below. This study defines sites as public housing developments and the communities in which they are located. The study team identified a mix of sites meeting various criteria across three states.

Site visits, key constituent interviews, and family interviews. We will conduct in-depth case studies at six sites to better understand the ECE needs and preferences of families living in public housing developments, as well as the benefits and challenges of operating co-located public housing developments and ECE programs. The site visits include key constituent interviews with public housing development administrators and staff, and ECE administrators and staff, and will be used to explore the process of co-locating ECE and public housing, as well as any supports or resources provided to families living in public housing developments to locate or enroll in ECE.

Site visits will also include interviews with families living in public housing developments to better understand their access to ECE as well as their ECE needs and preferences.

Information from this research will enhance HUD and HHS's efforts to better prioritize or promote the co-location of ECE and public housing developments as authorized in the Consolidated Appropriations Act, 2021.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The study includes the collection of qualitative data from key constituents and family interviews. Collection of this data will not be automated. Information from key constituents and families will be collected using open-ended, semi-structured interviews, enabling the study team to explore nuances in the respective interviewee's experience with ECE and public housing assistance. This is necessary to capture relevant and current contexts, and participants will be compensated for their time.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

To the study team's knowledge, there are no other duplicative research studies exploring the same constructs in the same contexts. To avoid duplication of information, the study includes a literature review and state and local policy scans to assess availability of similar information.

5. If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.

The collection of information does not impact small businesses or other small entities directly.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The most recent and comprehensive study of ECE services co-located in public housing developments was conducted as part of a demonstration project commissioned by HUD in 1992.¹⁰ The demonstration project found positive employment and family outcomes, but the relevance of findings is limited in today's ECE landscape. Therefore, there is a critical need for HUD to collect new information on current ECE contexts, the accessibility of the programs, and the ECE needs and preferences of families living in public housing developments to promote equitable access to ECE for families. Given this need, the Consolidated Appropriations Act, 2021 authorized HUD to collaborate with HHS to better prioritize or promote co-located ECE for families living in public housing developments.

The information collected for the study will enable HUD and HHS to meet Congressional requirements to enhance and streamline service delivery for impacted key constituents / residents where there are overlaps between those in need of housing and ECE assistance. In lack of such data collection would delay meeting Congressional requirements and deprive families of better access to housing and ECE assistance.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - requiring respondents to report information to the agency more than quarterly – **“Not Applicable”**
 - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of the request – **“Not Applicable”**
 - requiring respondents to submit more than an original and two copies of any document – **“Not Applicable”**
 - requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years – **“Not Applicable”**
 - requiring a request in connection with a statistical survey that is not designed to produce valid and reliable results than can be generalized to the universe of study – **“Not Applicable”**
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB – **“Not Applicable”**
 - requiring a request that includes a pledge of confidentiality that is not supported by authority established in statute or regulation (and that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use) – **“Not Applicable”**
 - requiring respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information’s confidentiality to the fullest extent permitted by law – **“Not Applicable”**

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.
 - Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.

- Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5 CFR 1320.8 (Paperwork Reduction Act of 1995), a Notice of Proposed Information Collection for publication in the Federal Register has been prepared to announce the agency's intention to request an OMB review of data collection activities for the Study of Child Care in Public Housing. HUD published a 60-Day Notice of Proposed Information Collection in the Federal Register on March 10, 2023, (Docket No. FR-15061). The notice provided a 60-day period for public comments. No public comments were received during the review period which concluded on May 9, 2023.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

The study includes conducting semi-structured interviews with up to 16 key constituents involved in the operations of either a public housing development, an ECE program, or a co-located ECE program in public housing development housing at each of the six sites in three states. We will also conduct up to 18 interviews with families at each of the six public housing development sites selected for the study. It is important to respect the time and contributions of the key constituents and families. Interviewees will receive a \$50 gift card as a thank you for their time. See the interview protocols in Appendices D-H.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The study design and data collection approach ensure that our research approach is rigorous and ethical. The design meets the requirements of the Privacy Act, 5 U.S.C. 552a, ensuring that any personally identifying information (PII) required as part of the recruitment for qualitative interviews is stored with the appropriate safeguards. To ensure that all staff are adhering to proper data collection procedures and protocols for human subjects, the study has sought official Institutional Review Board (IRB) review approval for all aspects of the study. The approval was granted on June 6, 2023 (see Appendix A).

All interviewees will also be informed about data safety and protection protocols through a consent process. They will be asked to review consent forms outlining safeguards for privacy protection. (See consent forms in Appendices B and C.) Given that written consent would be the only information tying individual participants to the study, the study team sought IRB approval for a waiver of written consent. The approval was granted on June 6, 2023 (see Appendix A). All participants will be asked to provide verbal consent to participate in the research and will have the opportunity and flexibility to decline participation in the study at any point in time. Participants names and any other PII will not be tied to individual responses or included in any reports. Participant consent forms were updated to include a burden statement, which was approved as an

administrative change by the IRB. The IRB statement indicating the change qualifies as administrative is also included in Appendix A.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This information collection does not include any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices;
- If this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in chart below; and
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Consent Form for Families Living in Public Housing Developments (Appendix B)	108	1	108	0.16	17.28	\$10.62	\$183.51
Constituent Consent Form (Appendix C)	96	1	96	0.16	15.36	\$43.33	\$665.55
Interviews with Housing Constituents (Appendix D)	24	1	24	0.83	19.92	\$43.33	\$863.13
Interviews with CC&R Administrators (Appendix E)	24	1	24	0.83	19.92	\$43.33	\$863.13
Interviews with CCDF State Administrators and HSCO Directors (Appendix F)	24	1	24	0.83	19.92	\$43.33	\$863.13
Interviews with Co-Located ECE Program Directors (Appendix G)	24	1	24	0.83	19.92	\$43.33	\$863.13
Interviews with Families Living in Public Housing Developments (Appendix H)	108	1	108	0.83	89.64	\$10.62	\$951.98
Total					201.96		\$5,253.57

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet shown in Items 12 and 14).

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;

- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

This data collection effort involves no recordkeeping or reporting costs for respondents other than the time burden to respond to questions on the data collection instruments as described in Item 12 above. There is no known additional cost burden to the respondents.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The study costs to the Federal Government are associated with review of the OMB PRA and IRB packets for the study, data collection, and data disposition. These costs total \$310,240.00.

15. Explain the reasons for any program changes or adjustments reported in Items 12 and 14 of the Supporting Statement.

This submission to OMB is an initial submission and does not involve any program changes or adjustments.

16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The outcome of this study will be a public report. The report will include findings from the exploratory information gathering, qualitative data collection and syntheses, and findings from an analysis of ECE and public housing development secondary administrative data efforts and associated quantitative analyses. Quantitative analyses associated with this project do not involve direct data collection, or pose any additional burden to the public and therefore are not included for consideration in this OMB application. Where applicable, findings will be aggregated at the site- or state-level.

The table below presents an overview of the time schedule for the entire project. This schedule assumes that data collection begins after OMB clearance in December 2023.

Task	Deliverable	Status (Pending, Ongoing, Submitted, Complete, Delayed)	Deliverable Due Date
Task 5.1 Project management			
5.1.1	Kickoff meeting	Completed	
5.1.2	Draft management and work plan	Completed	4-Nov-22
5.1.2	Final management and work plan	Completed	18-Nov-22
5.1.3	Monthly reporting and ongoing communication	Ongoing	Monthly
Task 5.2 Research design/data collection and analysis plan			
5.2.1and 5.2.2	Literature review and state policy scan	Completed	17-Feb-23
5.2	Draft Research Design, Data Collection and Analysis Plan (RD/DCAP)	Completed	31-Mar-23
5.2	Final RD/DCAP	Completed	14-Jun-23
Task 5.3 OMB and PRA packages			
5.3	Draft Paperwork Reduction Act (PRA) and Institutional Review Board (IRB) packages and Privacy Act documentation	Completed	12-Jun-23
5.3	Final PRA and IRB packages and Privacy Act documentation	Pending	23-Jun-23
Task 5.4 Data collection, analysis, and disposition			
5.4	Memo summarizing status of activities related to data sharing agreements	Pending	25-Aug-23
5.4	Memo summarizing first site visit	Pending	15-Dec-23
5.4.4	Preliminary data briefing	Pending	15-Mar-24
5.4.5	Final data deliverable	Pending	13-Sep-24
Task 5.5 Comprehensive report			
5.5.1	Report outline	Pending	17-Feb-24
5.5.2	Draft report	Pending	17-May-24
5.5.3	Final report	Pending	19-Jul-24
Task 5.6 Final briefing and webinar			
5.6.1	Draft briefing slides	Pending	17-May-24
5.6.2	Final briefing	Pending	24-May-24

Task	Deliverable	Status (Pending, Ongoing, Submitted, Complete, Delayed)	Deliverable Due Date
5.6.3	Final briefing memo*	Pending	7-Jun-24
5.6.4	Draft webinar slides	Pending	2-Aug-24
5.6.5	Final webinar slides	Pending	16-Aug-24
5.6.6	Webinar and recording	Pending	13-Sep-24

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

No approval is sought to not display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in item 19.

No exceptions

B. Collections of Information Employing Statistical Methods