

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

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

Formative Data Collections for ACF Research

0970 – 0356

Supporting Statement

Part A

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Part A

Executive Summary

- **Type of Request:** This Information Collection Request is for a generic information collection under the umbrella generic, Formative Data Collections for ACF Research (0970-0356).
- **Description of Request:** The Office of Planning, Research & Evaluation (OPRE) within the Administration for Children and Families (ACF) at the Department of Health and Human Services (HHS) proposes to conduct a survey of child care licensing administrators. This survey is part of a larger project, The Role of Licensing in Early Care and Education, which aims to address current research gaps and needs in Child Care and Early Education (CCEE) licensing through primary data collection activities. The proposed survey has one primary purpose: to gather information regarding front-line licensing staff members' work schedules and contact information, to prepare for a national survey of front-line child care licensing staff, which will be submitted in a forthcoming full information collection request.

We do not intend for this information to be used as the principal basis for public policy decisions.

- **Time Sensitivity:** This information collection request is time sensitive. The information collection must be completed by January 2023 to inform the TRLECE national survey of front-line child care licensing staff (covered under a forthcoming full information collection request) which will begin in February 2023 (pending OMB approval).

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A1. Necessity for Collection

Front-line child care licensing staff¹ are the face of state licensing agencies. They conduct child care inspections and regularly visit child care programs or facilities, making them the licensing representatives who interact most often with providers. Further, they are tasked with interpreting licensing regulations in real time as they visit child care sites and may have a role in determining when enforcement actions are taken. Despite their importance in the CCEE system, there is very limited research describing front-line staff, and we found no research that involved data collection directly from front-line staff. Because of front-line staff's pivotal role in the CCEE licensing system, the field needs to better understand their characteristics, perceptions of their roles, and job challenges.

The primary goal of this licensing administrator survey is to gather information regarding licensing staff members' work schedules and contact information to prepare for a national survey of front-line child care licensing staff. A full information collection request (ICR) is in process to be submitted by fall 2022. There is no national database of front-line child care licensing staff's contact information, work schedules, or office location, and there are minimal public records of front-line licensing staff contact information; the contact information that is publicly available may not be up to date. As such, we need to reach out to licensing administrators to gather scheduling and contact information necessary for the national survey, expect this is likely to take several months. Since this information will be used to contact the front-line staff members starting this data collection in advance of the full ICR is critical.

There are no legal or administrative requirements that necessitate this collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose

Purpose and Use

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for research and evaluation (0970-0356):

- inform the development of ACF research
- maintain a research agenda that is rigorous and relevant

This primary data collection is intended for research purposes and is part of the OPRE-funded project, The Role of Licensing in Early Care and Education (TRLECE) project, funded by the Office of Planning, Research, and Evaluation. The team is planning to conduct several descriptive studies, which will be included in a future full OMB package. The primary goals of these descriptive studies are to fill gaps in the literature and build the field's knowledge about 1) the components of the licensing system, 2) the licensing workforce, and 3) child care provider perceptions of the licensing system.

The purpose of this specific data collection activity is to gather information about front-line licensing staff (e.g., work schedule, contact information) from each state and the District of Columbia (N=51).

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.

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Findings from this data collection will inform a future front-line child care licensing staff survey that is part of the larger TRLECE project.

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:

1. What are the work schedules and best ways to contact front-line child care licensing staff in each state and the District of Columbia?
2. What are the names and contact information of the front-line child care licensing staff in each state and the District of Columbia?

Study Design

This formative data collection will include a survey of child care licensing administrators in all states and the District of Columbia (N = 51) for some high-level information using a brief, web-based or telephone questionnaire. This information will include topics such as who employs the front-line staff (e.g., state, county, contractor) and what hours they typically work, as well as requesting a list of names and contact information for all front-line staff in their state/district.

Based on our prior work with child care licensing, we know that the issues faced by each state and the District of Columbia are unique. Including as many states as possible is important because they vary enormously in how their child care licensing system is organized and where front-line staff are housed. Surveys are ideal in situations like this where the range of possible responses (e.g., a Monday through Friday work schedule) is known. Table A2 provides details about the respondents, instrument, mode, and duration of the survey.

Table A2. Summary of proposed data collection activity

<i>Data Collection Activity</i>	<i>Instrument</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Licensing administrator survey to prepare for front-line staff data collection	Protocol attached (Instrument 1)	<p>Respondents: The licensing administrator in each of the 50 states and the District of Columbia.</p> <p>Content:</p> <ul style="list-style-type: none"> • Information about who employs front-line staff, • Best times to reach front-line staff, and • Names and contact information for all front-line staff in their state (shared by uploading a link, typing out in a text box, or other means that work for respondents). <p>Purpose: Maximize data collection efficiency</p>	<p>Mode: Web-based or telephone survey</p> <p>Duration: 15 minutes</p>

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		and collect contact information to recruit front-line licensing staff for a future survey.	
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Data from this information collection is not intended to be used as the principal basis for public policy decisions and is not expected to meet the threshold of influential or highly influential scientific information.

The main limitation of this design is that some state child care licensing administrators might not have a comprehensive list of the requested information readily available. Additionally, some administrators might not have the access or authority to provide a comprehensive list of the information requested.

Other Data Sources and Uses of Information

Information from the licensing administrator survey to prepare for front-line staff data collection will inform a subsequent survey of front-line licensing staff that is part of the larger TRLECE study and will be covered by a future full OMB package.

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. Links to the survey will be distributed electronically. 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 survey 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 providers 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 study does not duplicate any other work being done by ACF and does not duplicate any other data sources. There is no national database of front-line child care licensing staff's contact information, work schedules, or office location.

A5. Impact on Small Businesses

No small businesses will be involved with this information collection.

A6. Consequences of Less Frequent Collection

This is a one-time collection.

A7. Now subsumed under 2(b) above and 10 (below)

A8. Consultation

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Federal Register Notice and Comments

In accordance with the Paperwork Reduction Act (PRA) 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 two notices in the Federal Register announcing the agency's intention to request an OMB review of the overarching generic clearance for formative information collection. This first notice was published on November 3, 2020, Volume 85, Number 213, page 69627, and provided a sixty-day period for public comment. The second notice published on January 11, 2021, Volume 86, Number 6, page 1978, and provided a thirty-day period for public comment. ACF did not receive any substantive comments.

Consultation with Experts Outside of the Study

We worked with the TRLECE Technical Expert Panel (TEP) for guidance as we implemented all study activities within the broader TRLECE study, and asked for their input on this survey as well. We also invited a separate panel of state licensing staff to provide advice and guidance about the instrument, procedures, and interpretation of findings. This is especially important given that this is a new area of research. Fewer than 10 experts were engaged in these reviews, therefore these activities are not subject to PRA.

A9. Tokens of Appreciation

No token of appreciation will be offered.

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

Personally Identifiable Information

In order to reach out to child care licensing administrators we will collect their contact information from public sources. As part of the current data collection, we will ask the licensing administrators for the names and contact information (work telephone numbers and work email addresses) for front-line staff. That information will be used for recruitment and follow-up in our subsequent survey of front-line staff which will be covered under a future, full OMB package. We anticipate receiving names and contact information for front-line staff from most states. (See Supporting Statement B4 for recruitment plan for our subsequent survey in states that cannot share contact information.) For both this licensing administrator survey and the subsequent front-line staff survey, personally identifiable information (PII) will be associated with survey responses initially to track who has completed the surveys and who needs a follow-up reminder.

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, the data will be downloaded and included in a dataset stored on Child Trends' secure server. (See Supporting Statement B7 for additional information on data handling procedures.) Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

Assurances of Privacy

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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. As specified in the contract, the Contractor will comply with all Federal and Departmental regulations for private information. The research team has obtained an Institutional Review Board (IRB) letter of exemption for all aspects of this study (see Appendix A).

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' 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 read 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 Information²

We will not collect sensitive information in this survey.

A12. Burden

Explanation of Burden Estimates

We believe that it will take child care licensing administrators little time to complete the licensing administrator survey to prepare for front-line staff data collection (Instrument 1) because the survey will be brief. To verify our estimate, we asked the TEP to review our expectation of the burden for this instrument. The goal is to maximize the efficiency of data collection activities and minimize burden on participants. Table A12 summarizes our burden estimates for the proposed instrument.

Estimated Annualized Cost to Respondents

The estimated annualized cost for respondents is shown in Table A12. The source for the mean hourly wage information for state government child care administrators is the Bureau of Labor Statistics, Occupational Employment and Wages, May 2021. For administrators, the mean hourly wage of \$40.80 was used, based on the wage for state government, excluding schools and hospitals, "Education and

² 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.

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Childcare Administrators, Preschool and Daycare: Child Day Care Services”
(<https://www.bls.gov/oes/current/oes119031.htm>).

The total estimated annual cost amount is \$520.20.

Table A12. Annual burden and cost estimates

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
Licensing administrator survey to prepare for front-line staff data collection	51	1	0.25	13	\$40.80	\$530.40
Total				13	\$40.80	\$530.40

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

The total cost to the Federal government for the data collection activities under this current request will be \$111,890.

Table A14. Annual Costs to the Federal Government

Cost Category	Estimated Costs
Data Collection	\$111,890
Total/annual costs over the request period	\$111,890

A15. Reasons for changes in burden

This is for an individual information collection under the umbrella formative generic clearance for ACF research (0970-0356).

A16. Timeline

Task	Months After OMB Approval
Begin recruitment	Within 1 month
Data collection	Months 1 through 3 (3-month window)

A17. Exceptions

No exceptions are necessary for this information collection.

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Attachments

Instrument 1: Licensing administrator survey

Appendix A: IRB exemption letter

Appendix B: Recruitment of licensing administrators

Appendix C: Project flyer for licensing administrators

Appendix D: Letter of support from OCC