

**Financing for ECE Quality and Access for
All:
Key Informant Interviews for an
Environmental Scan of State and Federal
Financing Policies**

Formative Data Collections for ACF Research

0970 - 0356

Supporting Statement

Part A

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Submitted By:
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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:** This proposed information collection includes key informant interviews as a part of an environmental scan—also inclusive of a policy scan—of federal- and state-level Head Start and early care and education (ECE) policies on the braiding of funding. Information collection would include semi-structured interviews with up to 16 ECE and Head Start administrators at the program-, state-, and/or regional/federal-levels best positioned to fill knowledge gaps identified by the policy scan. The data collected will not be representative and will not be generalizable to the broader population. We do not intend for this information to be used as the principal basis for public policy decisions. The data collected, combined with information from our policy scan, will inform future research activities. These activities include the development of a nationwide descriptive study with survey and case study components. Data collected through key informant interviews will support survey item development and sampling, as well as site selection for case studies.
- **Time Sensitivity:** The request does have some time sensitivities, as key informant interviews are needed to complete the environmental scan that is intended to inform the study design of a nationally-representative survey and subsequent case studies. The research team anticipates needing the findings from these key informant interviews before late Fall 2022 in order to begin the development of survey items and case studies (inclusive of a future full information collection request) to begin in Winter 2023.

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

A1. Necessity for Collection

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 data collection as part of the *Financing for Early Care and Education: Quality and Access for All* (F4EQ) project. The focus of the F4EQ project is the “braiding” of funding in early care and education (ECE), defined here as an umbrella term that encompasses all the different methods ECE programs use to combine multiple funding sources to support the total cost of providing services to children and families. The purpose of the project is to better understand the landscape of Head Start’s participation in and use of braided funding by (1) identifying the most common braiding approaches, (2) examining how these approaches can equitably advance the provision of high-quality and comprehensive ECE services, and (3) documenting how participation in braiding funding relates to Head Start’s engagement with other ECE programs and systems efforts.

In order to design a nationally-representative, descriptive study—inclusive of a survey and case studies—OPRE and its contractors (henceforth referred to as the ‘research team’) first need key policy and policy implementation knowledge. To that end, the research team will conduct key informant interviews as part of an environmental scan of federal- and state-level policies and approaches to the braiding of funding that include Head Start. The ultimate goal of these interviews is to fill in knowledge gaps identified by an initial policy scan. Resulting findings will inform the future descriptive study for which a full information collection request will be submitted to the Office of Management and Budget (OMB).

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

The current information collection is intended for research purposes. The purpose of the study is to explore Head Start’s role and participation in braided funding strategies to support high quality ECE programming. The primary goal of the key informant interviews is to probe the connections between state and federal policy, policy implementation processes, and implemented practices at the program level. The semi-structured interview approach allows for rich and nuanced descriptions from informants of their experiences creating, implementing, interpreting, and supplementing written policy around the braiding of funding.

The findings from this information collection are intended to inform future research activities. Findings will initially be synthesized alongside policy scan findings for internal use by OPRE. However, de-identified and aggregated findings may appear in publicly disseminated reports, briefs, and/or presentations to different target audiences—including policymakers, researchers, practitioners, and the general public. Purposes may include sharing information, such as broad themes or key takeaways, and/or providing rationale for the design of future research activities.

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

This proposed information collection meets a main goal of ACF’s generic clearance for formative data collections for research and evaluation (0970-0356): to inform the development of ACF research. 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.

Research Questions or Tests

The proposed data collection is intended to probe key informants’ knowledge related to each of the overall F4EQ project’s three primary research questions:

1. What are **common approaches** to braided funding that include Head Start and how are they implemented?
2. What are the federal, state, or local financing **policy levers** (e.g., requirements, regulations, standards) and **enabling conditions** (e.g., governance structures, mindsets, the political will to braid ECE funds) that affect Head Start’s ability to engage in braided funding and/or coordination across ECE systems?
3. How is the use of or participation in different approaches to braided funding related to Head Start’s (a) **program implementation** and (b) **integration** within broader ECE systems?

Study Design

OPRE aims to address the research questions through interviews with up to 16 key informants, purposefully selected from those most knowledgeable about braiding and blending policy and practice in their respective “levels” (program, state, and regional/federal). See Supporting Statement B, part 2 for more information on respondent selection. Data collection will take place over approximately 3 months in the fall of 2022.

We will include any limitations in all publications resulting from the information collection. This includes the fact that these results are not intended to be representative of or generalizable to any given subpopulation, but rather to provide descriptive information about what policies and approaches are being implemented at various “levels” and what their key challenges are for the purpose of informing the design of future research. See Supporting Statement B, part 1 for more detail on the study design, its appropriateness for the intended use, and its limitations.

Exhibit A2.1: Data Collection Activities

<i>Data Collection Activity</i>	<i>Instruments</i>	<i>Respondents</i>	<i>Purpose of Collection and Content</i>	<i>Mode and Duration</i>
Semi-structured interviews with policy and/or practice experts	Instrument A – Program-Level Interview Protocol	<ul style="list-style-type: none"> • Head Start Program Directors • Head Start Finance Managers • EHS-CPP Directors 	Purpose: Collect information about policies and implementation of braided funding approaches at different levels of the ECE system. Content:	Mode: Virtual interview Duration: 1 hour
	Instrument B	• State-level ECE		Mode:

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

	- State-Level Interview Protocol	<ul style="list-style-type: none"> Policy individuals State-level CCDF-focused and PDG-focused staff Head Start Collaboration Office Directors 	<ul style="list-style-type: none"> Perspectives related to the supports, challenges, and benefits of using different braided funding approaches to support children, families, and staff in ECE programs. Questions about how respondents make decisions about how and when to braid funds, and across which sources. <p>Questions are geared toward understanding decision making, implementation, and perceived challenges and benefits – all of which we are unable to answer with a document-oriented policy scan alone.</p>	Virtual interview Duration: 1 hour
	Instrument C - Regional/Federal-Level Interview Protocol	<ul style="list-style-type: none"> Regional Office Staff T/TA staff that develop guidance for grantees on meeting fiscal requirements 		Mode: virtual interview Duration: 1 hour

Other Data Sources and Uses of Information

Recruitment activities will be used in concert with publicly available data on roles, responsibilities, and contact information of relevant staff.

These proposed key informant interviews will be a part of a larger environmental scan that includes a policy scan of publicly-available federal- and state-level Head Start, state preschool, and ECE policies on the braiding of funding and/or requirements affected by the use of braided funding. The policy scan is intended to explore the existence of and alignment of policies by state and begin to think through how braiding Head Start funding with other sources of ECE funds may impact access, quality, and equity. Key informants will be selected based on who is best positioned to fill or elaborate on knowledge gaps identified by the policy scan, and the combined environmental scan knowledge (policy scan and key informant interviews) will inform the planning and design of a future national survey and set of case studies.

A3. Use of Information Technology to Reduce Burden

The research team will employ information technology as appropriate to reduce the burden of respondents who agree to participate. All data collection efforts will be conducted via a video or conference call. This will allow respondents to participate from a convenient and safe location.

All interviews will be recorded (with the consent of the key informant) and transcribed, reducing burden by not needing to confirm responses post-data collection (which would require additional respondent time) and by not needing to take verbatim notes, which also minimizes the time needed during the interviews.

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

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

The proposed key informant interviews do not duplicate any other work being done by ACF and does not duplicate any other data sources. The purpose of this collection is to inform future data collections intended to better support the quality of future ACF research, evaluation, and program support regarding the braiding of funding to support high-quality ECE.

A5. Impact on Small Businesses

No small businesses will be involved with this information collection. However, the Head Start programs whose leaders choose to participate in this research may be small, not-for-profit entities. The research team will reduce burden to the furthest extent possible for these entities by scheduling data collection at convenient times and adhering to the burden estimates provided.

A6. Consequences of Less Frequent Collection

This is a one-time data 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 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

The research team has not consulted outside experts for this collection.

A9. Tokens of Appreciation

No tokens of appreciation will be offered.

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

Personally Identifiable Information

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

The research team will collect the names and contact information (phone numbers and/or email addresses) from either existing public data sources or from people who recommend potential respondents, solely for the purposes of outreach and scheduling. The research team will not be collecting any personally identifiable information (PII) beyond contact information, which will be kept private. Contact information will never be stored with the data collected from the individual; a unique identifier will be used on any recordings and transcripts related to interviews.

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

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.

Informed consent will be obtained from participants to ensure that they understand the nature of the research being conducted, that their participation is voluntary, and their rights as participants (see "Attachment 1—Consent Language for Data Collection"). The consent script will be read aloud as the introductory script for all interview protocols. All respondents will provide verbal informed consent. The consent script will request verbal permission to record. If a respondent declines the request to record, the interviewing researcher will take detailed notes instead. The consent script will inform respondents that recordings will be used for notetaking purposes only, recordings will be deleted following transcription, transcriptions will not include any personally identifying information, and they will not face any consequences for refusing to be recorded.

The research team will obtain Institutional Review Board (IRB) approval for this recruitment, consent form, data collection, and analysis processes included in this proposed collection. Participants who have questions about the consent statement or other aspects of the study will be instructed to call the NORC at the University of Chicago's (NORC) principal investigators or the administrator of NORC's IRB.

Data Security and Monitoring

ID numbers will be assigned to each respondent. Names or other identifiers are not attached to the interview data. Contact information and interview data will not be combined into one dataset.

As specified in the contract, the Contractor shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information.

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

Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations. In addition, the Contractor must submit a plan for minimizing to the extent possible the inclusion of sensitive information on paper records and for the protection of any paper records, field notes, or other documents that contain PII that ensures secure storage and limits on access.

A11. Sensitive Information¹

No sensitive information will be collected as a part of this task.

A12. Burden

Explanation of Burden Estimates

To estimate the burden for each proposed instrument, the project team piloted each instrument internally and considered the number and type of questions for each respondent along with the amount of time allotted for each interview. The goal of each instrument and the data collection effort overall was to maximize the efficiency of data collection activities and minimize burden on participants.

Estimated Annualized Cost to Respondents

The estimated annual cost for respondents is shown in Exhibit A12.1. The source for the mean hourly wage information for each respondent type is Bureau of Labor Statistics, Occupational Employment and Wages, May 2021. For the purposes of calculating cost to respondents, the research team used the highest hourly rate among potential respondents for each protocol.

Instrument A

- For Head Start Program Directors, Head Start Finance Managers, and EHS-CPP Directors, the mean hourly wage of **\$45.54** was used, based on the wage for other education administrators (11-9039 Education Administrators, All Other) <https://www.bls.gov/oes/current/oes119039.htm>

Instrument B

¹ 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 State-level ECE Policy individuals, State-level CCDF-focused and PDG-focused staff, and Head Start Collaboration Office Directors, the mean hourly wage of **\$45.54** was used, based on the wage for other education administrators (11-9039 Education Administrators, All Other)
<https://www.bls.gov/oes/current/oes119039.htm>

Instrument C

- For Regional Office Staff and T/TA Staff, the mean hourly wage of **\$61.92** was used, based on the wage for training and development managers (11-3131 Training and Development Managers)
<https://www.bls.gov/oes/current/oes113131.htm>

Exhibit A12.1: Burden and Cost to Respondents

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
Program-Level Interview Protocol	5	1	1	5	\$45.54	\$227.70
State-Level Interview Protocol	6	1	1	6	\$45.54	\$273.24
Regional/Federal-Level Protocol	5	1	1	5	\$61.92	\$309.60
Total				16	\$50.65	\$810.54

A13. Costs

As respondents will be providing their expertise on their professional positions, honoraria in the amount of \$50/hour will be provided directly to respondents as compensation for their knowledge and time participating in the proposed key informant interviews, as shown in Exhibit A13.1 below.

These honoraria are appropriate for these professionals as they have specialized knowledge and perspectives that are being requested in addition to their regular duties as administrators, directors, and skilled staff. Given the level of demand already on their time, the proposed honoraria are important to ensure the respondents are compensated for the additional time to participate in the study. In the interest of equity, we will offer all respondents the same honoraria as all respondents will have the same time burden and provide information of equal value to the project. \$50 represents the average cost across all respondents for the 1-hour burden per response. The honoraria will be provided in the form of a gift card.

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

Exhibit A13.1: Burden to Respondents and Proposed Honoraria

Respondent	Data Collection Instrument	Estimated time to complete	Proposed Honorarium
<ul style="list-style-type: none"> • Head Start Program Directors • Head Start Finance Managers • EHS-CPP Directors • State-level ECE Policy individuals • State-level CCDF-focused and PDG-focused staff • Head Start Collaboration Office Directors • Regional Office Staff • T/TA staff that develop guidance for grantees on meeting fiscal requirements 	<p align="center">Program-Level Interview Protocol</p> <p align="center">State-Level Interview Protocol</p> <p align="center">Regional/Federal-Level Protocol</p>	1 hour	\$50.00

A14. Estimated Annualized Costs to the Federal Government

The total cost for the data collection activities under this current request will be \$29,120. Costs include 241 personnel labor hours and other direct costs such as honoraria for respondents (\$800), interview audio file transcription (\$1,440), and IRB costs (\$500). The costs include field work and analysis. As noted in section A2, the goal is for the findings to be first and foremost for internal ACF use informing future descriptive research. The costs for writing up findings to share with ACF are included in the Publications/Dissemination row. However, findings may be included in a public-facing brief summarizing the results of the overall environmental scan. Findings may also be shared publicly in service of justifying design decisions for future research activities. Estimated annualized costs to the federal government over the requested one-year approval period are as follows:

Cost Category	Estimated Costs	Personnel Labor Hours
Field Work and Analyses	\$20,120	166
Publications/Dissemination	\$9,000	76
Total costs over the request period	\$29,120	241

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

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

Milestone	2022					2023	
	8	9	10	11	12	1	2
OMB							
Outreach & Recruitment							
Data Collection							
Analysis							
Internal Reporting							

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Appendices

- Appendix 1—Consent Language for Data Collection
- Appendix 2—Environmental Policy Scan Sampling Memo
- Appendix 3—Recruitment Outreach Materials

Instruments

- Instrument 1 —Topic Guide for Semi-Structured Interviews