

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

Soliciting Input for the Consumer Education and Parental Choice in Early Care and Education Project

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 goal of this information collection is to gather perspectives from people with lived experiences to inform the design and interpretation of research activities as well as dissemination activities for the Consumer Education and Parental Choice (CEPC) project. The CEPC project aims to examine how parents find and use information when they look for and select child care and early education, and to understand the consumer education efforts that states, territories, and Tribes create to address those parents' needs.

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

- **Time Sensitivity:**
It is important to engage these individuals to inform project activities that are planned between 2023 and August 2025. Therefore, we request review as soon as possible.

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A1. Necessity for Collection

The Consumer Education and Parental Choice (CEPC) project aims to examine how parents find and use information when they look for and select child care and early education, and to understand the consumer education efforts that states, territories, and Tribes create to address those parents' needs. Project activities to date include: conducting a literature review, analyzing secondary data, conducting an environmental scan, conducting case studies with states and territories, designing a parent survey, and drafting a conceptual framework. The Administration for Children and Families (ACF) Office of Planning, Research, and Evaluation (OPRE) has contracted with NORC at the University of Chicago and its subcontractor, Urban Institute to conduct this study.

To help design and improve project activities, the project team seeks to conduct information collection activities to hear from people and groups with lived experiences designing, supporting, delivering, or seeking out child care consumer education activities, resources, or services throughout the project's performance period (September 2020-2025). These information collection activities are an important component of the project because they will create a bidirectional exchange of timely information between the project team and the people and groups with lived experiences in the topics of study. These activities will include attending regularly scheduled meetings hosted by organizations working with individuals with relevant lived experience; other engagements we host such as webinars; interviews or focus groups; and other exchanges such as via surveys or email. These exchanges will inform project activities such as: research and protocol design, interpretations of study findings, product development, and dissemination of study findings. We refer to the individuals we will engage during our information collection activities as "contributors" throughout this document.

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
- ensure that research products are as current and responsive as possible

The purposes of the information collection activities are to share information about the project and get the perspectives of people with lived experience about project activities such as interpreting study findings, product development, or dissemination strategies. These perspectives will inform the project overall, as well as OPRE and ACF activities. For example, information collected may be incorporated into documents or presentations that are made public but will not identify any specific groups or individuals by name. ACF may use the information collected to inform future research or to guide supports for state, territory, or Tribal agencies that support parents' needs in finding and selecting child care.

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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

The information collected will address the following broad question: What are the perspectives of those with lived experiences related to the project activities and products?

Study Design

We plan to collect descriptive information from individuals with relevant lived experiences through various information collection activities. We plan to engage five groups of individuals with lived experience, including (1) parents/guardians, (2) service providers, (3) state/territory CCDF staff, (4) tribal CCDF lead agency staff, and (5) other individuals. More information can be found in SSB B2. Example activities include (1) our project team being invited to regularly scheduled meetings hosted by relevant organizations; (2) hosting webinars; (3) conducting telephone or in person interviews or focus groups; (4) sending surveys; (5) obtaining input through email. The specific information collection activities will depend on the stage of the CEPC project and the group with lived experience being engaged. For example, we developed a question bank (Instrument 1) we will use to select questions that are appropriate given the project’s stage and tailor the specific wording according to the audience being engaged and specific context of their experience (Instrument 1 contains wording that can be used to tailor the questions) . These information collection activities are meant to be responsive to the ongoing activities of the CEPC project, and therefore the frequency will be based on the timeline of approval and the specific activities that are underway. We plan to conduct 30 information collection activities that will take place about monthly beginning the month after approval.

The information collection activities will not produce specific research results, and the information collected is not intended to be generalizable to a particular service population or subpopulation.

<i>Data Collection Activity</i>	<i>Instrument</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Consumer Education and Parental Choice Project Contributor Engagements	<i>Instrument 1: Engagement Guiding Questions</i>	<p>Respondents: Individuals with relevant lived experience</p> <p>Content: The project team will select questions that relate to parental choice and consumer education as well as questions of interest; key constructs and topics that should be the focus of our project work; interpretation of findings; and (among staff at organizations/associations/government) priority strategies for disseminating study findings. The project team will select questions from Instrument 1- the bank of questions – to ensure no engagement is more than 15 minutes.</p> <p>Purpose: Learn about caregivers’ priorities and needs for consumer education to inform project activities such as the design of data collection and analysis activities</p>	<p>Mode: web-based or email dissemination, telephone, virtual or in-person meetings</p> <p>Duration: 15 minutes per engagement</p>

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Other Data Sources and Uses of Information

Other sources of information will not be used.

A3. Use of Information Technology to Reduce Burden

We will use technology to reduce burden when possible though this will vary by the type of information collection activity. For example, we will use opportunities to get web-based feedback (e.g., via email or online survey); hosting webinars, interviews, or focus groups that take place over the phone or in a virtual environment so attendees will not need to travel to participate. In these cases, we will use a platform that allows individuals to see each other through video cameras, allows the moderator to type notes that appear as if on a flip chart in a room, and that enables easy recording of responses so participants do not need to repeat themselves.

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

The data collection requested under this clearance does not duplicate any other work being done by ACF. To minimize the burden, one of the information collection activities described above is to collect information when we are invited to attend regularly scheduled meetings hosted by relevant organizations. By joining regularly scheduled meetings hosted by relevant organizations, we can minimize the burden on groups and individuals by limiting the number of meetings they need to attend to engage in the project and share their perspective.

We will rely on other information collection activities described above (hosting webinars; conducting telephone or in person interviews or focus groups; sending surveys; obtaining input through email) when there is not an option to collect information during regularly scheduled meetings

A5. Impact on Small Businesses

Some of the groups we may engage with are small businesses, such as childcare providers and organizations that share information with parents. We will make every effort to engage these contributors during regularly scheduled meetings such as meetings sponsored by national associations and organizations when child care and early education providers regularly meet to minimize scheduling burden. If meetings are not regularly scheduled, we will schedule information collection activities at times that are convenient for the contributors.

A6. Consequences of Less Frequent Collection

Potential negative consequences of less frequent data collection (i.e., less than 30 times) are that the planned CEPC project research activities and products will not reflect the on-the-ground experiences, perspectives, and priorities of individuals with lived experiences.

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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 project team did not consult with experts about this information collection.

A9. Tokens of Appreciation

No tokens of appreciation will be provided to respondents.

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

Personally Identifiable Information

The research team may collect personally identifiable information (PII) such as the names and contact information (phone numbers and/or email addresses) for contributors solely for the purposes of outreach and scheduling. This contact information will come primarily from our contacts or from ACF but will also come from sources such as project partners, national organizations, etc. We may also collect demographic information to describe contributors who provided input on project activities. We will only describe this information in aggregate. Any PII that stakeholders share about themselves or families with whom they work during an information collection activity that is not relevant to the information collection activity will not be retained. Any data with PII will be stored on Urban's secure server.

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.

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We may record engagements (such as focus groups, interviews, meeting conversations) with the permission of the contributors. Prior to beginning the engagement, we will inform all contributors of all planned uses of data and that their participation in the engagement is voluntary. We will tell contributors that only project team members who have signed the staff Confidentiality Pledge will listen to the recording. We will also inform contributors that if they want to say anything that they prefer not to be recorded, they can ask the CEPC project team staff to pause the recording. Contributors will be informed that they are free to skip any questions we ask or leave/end the engagement at any time. We will ask each contributor for their permission to record the engagement. If all contributors agree, we will begin the recording. If a contributor does not permit us to record, we will not record the engagement. All recordings will be stored on Urban's secure server.

Data Security and Monitoring

To protect any sensitive information that may be collected during our engagements, we have developed the following data security and monitoring procedures. Information collected for the purposes of engaging contributors may involve several types of data, such as notes, transcripts, or recordings; survey data; written feedback such as comments submitted via email.

Data Transmission, Storage, and Access

Any PII collected, such as contributor names, demographic information, email addresses, and phone numbers, for example, will be stored on the Urban Institute's password protected, secure server (hereafter referred to as "Y: Drive") in a project specific folder. This folder is accessible only to authorized research team members. Contact and demographic information will be deleted from the Y: Drive at the end of the project.

Notes, transcripts, and/or recordings from engagements such as meetings, webinars, interviews, or focus groups that include PII will be saved directly to Urban's Y:Drive if the research team member has access during the engagement or will be saved to their personal computer and then transferred and stored on Urban's Y: Drive. If information is collected from online platforms such as surveys platforms like Qualtrics or email applications, the information will be downloaded from the online application (e.g., Qualtrics or Outlook) to personal computers and, if it contains PII, stored on the Urban Institutes' Y:Drive.

No raw data files (for example from survey platforms like Qualtrics) will be shared via email. The use of paper printouts will be minimized. Urban's Office of Technology and Data create back-up copies of Y: Drive project folders containing confidential files, which are overwritten every 90 days.

When an Urban Institute staff member uses an account or a computer with access to the CEPC Y: Drive folder confidential data, he or she will be instructed to: not leave the session unattended, log out at the end of the session, and to lock up any storage media that hold confidential data. The CEPC project team will not include any contributor names, email addresses, or phone numbers in any products. We may include demographic characteristics of contributors reported at the aggregate-level in project products.

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Data Disposition and Destruction Procedures

All files containing information collected during our information collection activities will be destroyed at the end of the project. The project team will retain files until then to be able to address any inquiries that may arise and require access to data files. The team will run an erasure software program to permanently destroy all data in a way that renders them unreadable.

We will also use Federal Information Processing Standard compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission; will securely generate and manage encryption keys to prevent unauthorized decryption of information; will ensure that this standard is incorporated into its property management/control system; and will establish a procedure to account for all laptop computers, desktop computers, and other mobile devices and portable media that store or process sensitive information.

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. We will follow the project's 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 sensitive or PII that ensures secure storage and limits on access.

A11. Sensitive Information¹

We do not intend to collect sensitive information during these engagements. In the unlikely event that a someone voluntarily discloses sensitive information about themselves, families with whom they work, or instances of non-compliance with CCDBG mandates, our team will not document these disclosures and this information will be removed from notes, transcripts, and recordings. Any data that includes PII will be stored on Urban's secure server, accessible only by members of the research team.

A12. Burden

Explanation of Burden Estimates

We estimated the total number of respondents (536), assuming we may have at least one monthly collection activity (over 30 months) with an average of 18 individuals per month (e.g., if we attend a regularly scheduled meeting with 15-20 people). We assume we will follow up with each person who provides information during our collection activities, for a total of two responses per person. Each information collection activity will be tailored to take 15 minutes. Thus, we have estimated we will collect information from 536 individuals two times for about 15 minutes each or a total burden of 268

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.

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hours. The annual burden will be about 107 hours for each of the next 2.5 years. Depending on the context and timing of project activities, we will select relevant questions from the question bank (see “Instrument 1” attachment) and conclude our information collection after our allotted time is up.

Estimated Annualized Cost to Respondents

The average hourly wage for Individuals or households (parents or other guardians who have care-giving responsibilities or interests for children ages birth-12 years) is based on the federal minimum wage of \$7.25/hour.

The average hourly wage for Organizations/Associations that offer services/information on child care related needs is the average of the Bureau of Labor Statistics Occupational Outlook Handbook 2022 median pay estimates for child care workers (\$13.71/hour) (<https://www.bls.gov/oes/current/oes399011.htm>) and the 2022 median pay estimates for social and community service managers (\$35.69/hour) (<https://www.bls.gov/oes/current/oes119151.htm>).

Average hourly wages for State/Territory and Tribal CCDF lead agency staff were derived from the Bureau of Labor Statistics Occupational Outlook Handbook 2022 median pay estimates for Administrative Services Managers (\$49.68/hour) (<https://www.bls.gov/oes/current/oes113012.htm>).

The total estimated annual cost is \$2,844.33.

Instrument	No. of Respondents (total over request period)	No. of Responses per Respondent (total over request period)	Avg. Burden per Response (in hours)	Total Burden (in hours)	Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Engagement Guiding Questions	536	2	.25	268	107	\$26.58	\$2,844.33

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

Cost Category	Estimated Costs
Field Work	\$80,000
Summarizing information and preparing materials for ACF	\$15,500
Total costs over the request period	\$95,500
Annual costs	\$38,200

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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

Information collection activities will begin 1 month following OMB approval. We expect data collection to take place over about two and a half years.

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Instrument 1: Active Engagement Guiding Questions

Appendix A: Invitation to Share Information

Appendix B: Confirmation Email