

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

Consumer Education and Parental Choice in Early Care and Education

Formative Data Collections for ACF Research

0970 – 0356

Supporting Statement

Part A

September 2022

Submitted By:
Office of Planning, Research, and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services

4th Floor, Mary E. Switzer Building
330 C Street, SW
Washington, D.C. 20201

Project Officers:
Alysia Blandon
Bonnie Mackintosh

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

Part A

Executive Summary

- **Type of Request:** This Information Collection Request is for a new generic information collection under the umbrella generic, Formative Data Collections for ACF Research (0970-0356).
- **Description of Request:**

This is a new information collection request to gather information on current Child Care Development Fund (CCDF) Lead Agency consumer education (CE) efforts as they relate to parents' (refers to parents and guardians) early care and education search and selection. The aims of this study are to describe states' and territories' CE strategies, challenges and successes, and evaluation efforts as well as gather data to inform forthcoming project activities including potential research activities. To meet these objectives, the research team will conduct interviews with and collect documents from CCDF administrators, or their delegate, of all U.S. states, the District of Columbia (D.C.), and five territories. We do not intend for this information to be used as the principal basis for public policy decisions. Data collection will take place over a 6-month period.
- **Time Sensitivity:**

This information collected through these interviews will be used to inform other project activities, including development of a survey of parents and evaluation tools, and selection of case study sites. To stay on track with our project timeline we are targeting OMB approval by October 14th.

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

A1. Necessity for Collection

The Administration for Children and Families Office of Planning, Research, and Evaluation (OPRE) is interested in learning about current Child Care Development Fund (CCDF) Lead Agency consumer education (CE) efforts as they relate to parents' (refers to parents and guardians) early care and education (ECE) search and selection. The CCDF administrator (or their delegate) interviews and internal CCDF lead agency documents are a critical component to this study because they inform our team of (1) all strategies agencies are *currently* implementing, (2) nuances in those strategies (e.g., targeted audience of a particular strategy), (3) challenges and successes agencies have implementing CE strategies, and (4) evaluations of those strategies. The data collection requested under this clearance (i.e., interviews and documents) will help to fill in these important gaps in knowledge for ACF. 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

Information collected will inform OPRE's understanding of CCDF lead agencies' current CE and will provide the basis for forthcoming research under the same contract. Findings may also inform ACF activities and may be incorporated into documents or presentations that are made public. Public documents or presentations may include summaries of CE implemented across the county as well as novel strategies that states/territories report as being successful, but we will not identify any specific state or territory. The goal of sharing this information is to provide summative information about what ACF learns about CE efforts, which may be of interest to states and territories and technical assistance providers. The Office of Child Care (OCC) may also use the findings to guide supports for CCDF lead agencies. Finally, the findings may be shared with other researchers to inform future ACF research.

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

The guiding research questions are:

1. What types of CE activities are hosted for and information provided to families by CCDF lead agencies and their partners?
2. How do CCDF lead agencies market and disseminate CE information?
3. What successes and challenges have CCDF agencies had when implementing CE activities?
4. How do CCDF lead agencies evaluate or monitor their CE activities? What tools do CCDF lead agencies use to assess CE practices and policies?

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

Study Design

The study includes a one-time semi-structured interview (see Instrument 1) with and document collection from CCDF lead agency administrators, or another CCDF lead agency staff member they identify as the best person to answer the questions.

The results are not intended to be generalizable to a particular service population or subpopulation.

The table below describes the semi-structured interview and document collection activities in detail.

Data Collection Activity, Instrument(s) (if applicable)	Content, Purpose of Collection, Respondent (if applicable)	Mode, Duration (if applicable)
CCDF Administrator Interviews See Attachment Instrument 1: CCDF Administrator Interview Guide	<p>Content: CE materials, services, website, family outreach, evaluation and monitoring, and impact</p> <p>Purpose: Learn about states/territories current CE strategies, strengths and limitations of those strategies, types of families served through those strategies, and evaluation or monitoring of those strategies. Document similarities or differences in states/territories current CE. Summarize to what extent states/territories might be achieving different outcomes with similar CE activities.</p> <p>Respondents: 56 CCDF administrators, or their delegate, from all 50 states, the District of Columbia and from 5 territories, including American Samoa, Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, and the U.S. Virgin Islands.</p>	<p>Mode: Semi- Structured interviews</p> <p>Duration: 40 minutes</p>
Document Collection	<p>Content: CCDF lead agency documents with information on their states'/territories' CE.</p> <p>Purpose: Complement data gathered from CCDF plans and CCDF administrator/delegate interviews.</p> <p>Respondents: CCDF administrators, or their delegate</p>	<p>Mode: CCDF administrators or their delegate will submit documents.</p> <p>Duration: 30 minutes</p>

Other Data Sources and Uses of Information

In addition to data collected through the CCDF administrator interviews and document collection, we are using information from two publicly available sources including CCDF lead agencies' 2022-2024 CCDF plans and published web content (website and social media). Publicly available CCDF plans describe the Child Care Development Block Grant (CCDBG) mandated CE practices lead agencies *intend* to implement, but not what lead agencies are able to or have implemented. As such these CCDF plans serve as important contextualizing information for the interviewer and supplement data gathered through the interviews. Web content is also publicly available and depicts a subset of implemented CE strategies. Our team will collect data directly from websites and social media to minimize the amount of information we need to collect through the interviews.

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

A3. Use of Information Technology to Reduce Burden

To make scheduling easier for the CCDF Lead Agencies, we will use a tool called Calendly, so that participants can select from a large list of dates and times that correspond with the interviewers' schedules. We will also host the interviews using a video platform approved by the data security team or by phone, so that participants will not need to relocate to another site. If participants agree, we will record the interviews. If available, we will also use the video platform's transcription tool. Recording the interview and, possibly transcribing it, reduces burden on the CCDF administrator because they will not need to confirm responses during and after the interview which would require additional time.

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 and does not duplicate any other data sources that we have identified. By collecting data from publicly available sources, we can minimize the burden on CCDF administrators, or their delegate, by limiting questions (and duration of the interview) to those that cannot be answered through the CCDF plan and web reviews (see section A2 *Other Data Sources*).

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 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.

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

Consultation with Experts Outside of the Study

We met with the Child Care and Early Education Policy and Research Analysis (CCEPRA) team to gain insights into their approach for summarizing CCDF lead agencies' CE approaches described in their 2019-2021 CCDF plans and that were available on their ChildCare.gov webpages and to ensure that our team's data collection would not duplicate any of the CCEPRA team's efforts. Additionally, we met with the State Capacity Building Center (SCBC) to learn about the activities, data, and other resources that SCBC uses to support state and territory child care CE efforts. In addition to these lessons learned, we pre-tested our interview guide and document collection request with 3 prior CCDF administrators to ensure that we used appropriate and relevant language.

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 will collect the names and contact information (phone numbers and/or email addresses) for CCDF administrators solely for the purposes of outreach and scheduling. We will collect administrators' contact information from publicly available sources or from ACF. Any personally identifiable information (PII) that the participant shares about themselves or families with whom they work as part of their interview will be redacted from the transcript and documents collected. All data will be stored on NORC secure servers.

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

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. Interviews will be audio-recorded (with respondent permission) and shared only with the research team. Interviewers will read the consent form and get verbal consent for participating in the study, to record the interviews, and to share the recording with the research team (see informed consent language in the "Instrument" attachment). As specified in the contract, the Contractor will comply with all Federal and Departmental regulations for private information. The research team is currently in process of obtaining Institutional Review Board (IRB) approval for this study.

Although we will not provide respondent-level identifiers (e.g., names or initials) to ACF, anyone who knows the state or territory will also know who participated in the interview because typically only one or two people in each CCDF lead agency whose roles are appropriate for response. This means we cannot assure privacy. This is made clear through the introduction language for the interview guide (see Instrument 1). Findings may be shared publicly, but publicly shared results will not include state or territory identifiers.

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

Data Security and Monitoring

The Contractor has developed a Data Safety and Monitoring Plan that assesses all protections of respondents' PII. The Contractor shall ensure that all of its employees, subcontractors (at all tiers), and employees of each subcontractor, who perform work under this contract/subcontract, are trained on data privacy issues and comply with the above requirements.

As specified in the contract, the Contractor will 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. The Contractor shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. The Contractor shall: ensure that this standard is incorporated into its property management/control system; 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. 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 sensitive or PII that ensures secure storage and limits on access.

A11. Sensitive Information¹

We do not intend to collect sensitive information. However, in the interviews and the document collection it is possible that participants will voluntarily disclose sensitive information about themselves, families with whom they work, or instances of non-compliance with CCDBG mandates. Our team will redact any inadvertent disclosures. Additionally, our team will take all notes electronically that are stored on NORC's servers. NORC follows the least privilege data access model where only approved employees have access to the data.

A12. Burden

Explanation of Burden Estimates

Based on cognitive testing with prior CCDF administrators, we estimated that the interview itself will last about 40 minutes (range = 20-60 minutes). We estimate it will take about 30 minutes (range = 20-40 minutes) to find and submit the requested internal documents. We estimate that about 50% of all administrators, or their delegate, (n = 28) will provide documents for the optional document request and have included the calculation below.

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**

Instrument	Respondent	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
CCDF Administrator Interview Guide	CCDF Administrators /Delegate	56	1	0.66	37	\$47.89	\$1,771.93
Document Collection	CCDF administrators /Delegate	28	1	0.5	14	\$47.89	\$670.46
Totals		56			51		\$2,442.39

Note. Total estimates in the table above are rounded to the nearest whole number.

Estimated Annualized Cost to Respondents

Average hourly wages were derived from the Bureau of Labor Statistics Occupational Employment and Wage Statistics: May 2021 National Industry-Specific Occupational Employment and Wage Estimates mean pay estimates for Administrative Services and Facilities Managers (https://www.bls.gov/oes/current/naics4_999200.htm).

The total estimated annual cost is \$2,442.39.

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

The total cost for the data collection activities under this current request will be \$48,481.24. Costs include personnel labor hours and other direct costs such as interview transcription. Estimated costs to the federal government over the requested one-year approval period are included in the table below. The study team developed these estimates based on hourly estimates for staff contributions, by each activity listed.

Cost Category	Estimated Costs
Field Work	\$37,540.54
Publications/Dissemination	\$10,940.70
Total costs over the request period	\$48,481.24

A15. Reasons for changes in burden

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

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

A16. Timeline

Activities	Time to Completion
OMB Approval	
Train Interviewers	2 weeks after OMB approval
Schedule Interviews	10 weeks after interviewer training
Conduct Interviews	10 weeks after interviewer training (concurrent with scheduling interviews)
Collect Documents	2 weeks after interviews (8 weeks are concurrent with interviews)
Code Data	4 weeks after interviews (6 weeks are concurrent with interviews)
Memo of findings and tables	8 weeks after data were coded
Final Report	12 weeks after memo of findings and tables

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Instrument 1: CCDF Administrator Interview Guide

Appendix A: Recruitment and Follow-Up Materials