

Financing for Early Care and Education: Quality and Access for All (F4EQ)

OMB New Information Collection Request

Supporting Statement Part A

November 2023

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

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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 collection. We are requesting 1 year of approval.
- **Description of Request:**

The Office of Planning, Research, and Evaluation at the Administration for Children and Families proposes to conduct a nationwide descriptive study to better understand the landscape of Head Start's participation in coordinated funding models and the state policy contexts in which Head Start programs make funding decisions. This information collection will include: (1) a survey of Head Start program directors, and (2) a survey of state early care and education (ECE) administrators across all 50 states and Washington, DC. The survey of Head Start program directors will be a census and is intended to produce generalizable knowledge. The survey of state ECE administrators is not intended to be generalizable and instead is intended to provide state-specific context for understanding responses to the Head Start program directors survey. We do not intend for this information to be used as the principal basis for public policy decisions.
- **Time Sensitivity:** To stay on schedule for this project, the surveys need to be in the field beginning in January 2024.

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A1. Necessity for Collection

Across the United States, many early care and education (ECE) leaders piece together multiple funding sources to meet the total cost of delivering high-quality ECE programming. Bringing together, or *coordinating*, these various funding streams requires cooperation across different levels of the ECE system and has critical implications for program quality, workforce strength, and equity in access and outcomes for young children and their families. However, very little is known about the extent to which Head Start programs are coordinating funding or the mechanics of coordinating funding.

The Office of Planning, Research, and Evaluation (OPRE) at the Administration for Children and Families (ACF) under the U.S. Department of Health and Human Services (HHS) has contracted with NORC at the University of Chicago, with subcontracts to the Children's Equity Project, Start Early, and consultant Margery Wallen—henceforth referred to as “the research team”—to conduct a nationwide descriptive study to better understand the landscape of Head Start's participation in coordinated funding and the state policy contexts in which Head Start programs make financing decisions.

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 proposed information collection is intended for research purposes. The purpose of the Financing for ECE: Quality and Access for All (F4EQ) project is to better understand the landscape of Head Start's participation in and use of coordinated funding by (1) identifying Head Start programs' common approaches to coordinating funding and describing their implementation, (2) identifying the local, state, and federal conditions—including state-level approaches to coordinating funding—that may inform programs' decision making around coordinated funding and engagement with broader ECE systems, and (3) exploring potential associations between program coordinated funding models and those system-level conditions identified as well as program implementation. OPRE aims to better understand these three objectives through two nationwide surveys. The resulting insights from this descriptive study will fill knowledge gaps about Head Start's use of and participation in coordinated funding practices within ECE systems, including potential enablers and barriers. This project will identify promising approaches and inform program strategies and policy levers by which coordinated funding may support the equitable provision of more accessible, comprehensive Head Start services.

We anticipate the findings being used by policymakers as well as technical assistance staff. For example, findings may inform federal- and state-level

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policymakers about the facilitators of and barriers to Head Start programs' ability to coordinate funding as well as the potential benefits and consequences of doing so. Findings may inform decisions around what type of training and technical assistance supports may benefit programs, as well as what policy changes might better enable programs to construct successful funding models. Survey data collected from Head Start programs via this study will be archived and made available to the public for secondary data analysis. In addition, state policy information collected through the state survey may be incorporated into the dataset, to allow for other researchers to examine program survey responses within their state context to better understand patterns of Head Start program engagement with coordinating funding. Both surveys will inform eventual case studies to be completed under a future information collection.

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 study design will seek to answer the following research questions and example sub-research questions:

1. What are Head Start programs' **common approaches** to coordinated funding?
 - a. How common is it for Head Start programs to coordinate funding?
 - b. What are different common approaches to coordinated funding that include Head Start?
 - c. How are common approaches to coordinated funding implemented?
2. What are **system-level approaches and structures** around coordinated funding that may inform Head Start's approaches to coordinated funding and/or engagement with broader ECE systems? These include federal, state, or local financing **policy levers** (e.g., requirements, regulations, standards) and **enabling conditions** (e.g., governance structures, mindsets, the political will to coordinate ECE funds).
 - a. What are state-level approaches to coordinating ECE funding?
 - b. What structures and supports are in place at the system level (state, county) for the coordinating of ECE funding?
 - c. To what extent and in what ways is Head Start integrated into ECE policies and decision-making at the system level (state, regional, county)?
 - d. What are state and local contexts that could be conducive to or challenging for coordinating ECE funding?
3. How are Head Start programs' approaches to coordinating funding—including those that *do not* coordinate funding—related to (a) **system-level approaches and structures** around coordinated funding identified in RQ2 and (b) Head Start's **program implementation**?

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Study Design

The study design, inclusive of one-time survey data collection amongst each of the listed respondent groups, is appropriate for the purpose of producing nationally representative estimates of Head Start programs' involvement in coordinated funding models and the individual state policy contexts in which programs make funding decisions. See SSB, Section 1 for more information on the appropriateness of the study design, generalizability, and limitations. The study's limitations will be noted in all publications resulting from this information collection.

<i>Instruments</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode, Duration, and Frequency</i>
Head Start Program Survey	Respondents: Head Start program directors (inclusive of grantee and delegate agencies) Content: Survey sections include: Funding Sources, Managing Finances & Decision Making, Funding Allocation, Beliefs and Mindsets, Funding Stream Regulations, Partnerships, Program and Classroom Structure, Program Quality, Workforce, Training and Technical Assistance, Background Purpose: To collect nationally representative data that describes the ways in which Head Start programs fund their programs.	Mode: Web Survey Duration: 45-50 minutes Frequency: One time
State Systems Administrator Survey	Respondents: State-level early childhood education system administrators Content: Survey sections include: Funding Sources and Distribution, Funding Stream Regulations and Requirements, State Collaboration and Integration, Beliefs and Mindsets, TTA Guidance and Resources for Combining Fundings, Background Purpose: To collect data that describes state-level early childhood education funding policy decision making and approaches to cross-system collaboration.	Mode: Web Survey Duration: 30-40 minutes Frequency: One time

Other Data Sources and Uses of Information

For Design and Data Collection. The Head Start Enterprise System administrative data (HSES, OMB #0970-0207), in combination with the Head Start Program Information Report (PIR, OMB #0970-0427) will be used to establish the list of the population of program directors who will be potential respondents to the program survey. In addition, PIR and HSES population data will be used to assess response rates for subgroups over the course of the data collection. The CCDF Policies Database and National Institute for Early Education Research (NIEER) State

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of Preschool data sources will be used to identify potential respondents for the state level survey.

For Analyses and Reporting. The resulting survey data will be used in combination with other data sources for analysis and reporting. Data from the HSES and PIR, which contain program level data, will add depth to survey analyses. HSES and PIR data may be used, for example, to identify subgroups of interest (e.g., Region XI, Region XII, different agency types, whether or not the program is an Early Head Start Child Care Partnership (EHS-CCP) partner, larger and smaller programs). The CCDF Policies Database and NIEER State of Preschool data may be used to provide further state level context.

A3. Use of Information Technology to Reduce Burden

The surveys (see Instrument 1: Head Start Program Survey and Instrument 2: State Systems Administrator Survey) will be administered online via a survey platform such as Voxco. Collecting data in this manner reduces burden on respondents and improves data quality given the complex nature of skip patterns and fill-ins. Respondents will be given the option to download a PDF copy of their survey on the introductory page of the online survey platform. This will allow them to preview the questions, collect any helpful documentation, and/or ask colleagues for question-specific input. This option may reduce the total time needed to complete the surveys and may lead to more thorough and accurate data.

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/OPRE and does not duplicate any other data sources in the public or private sector that we could identify. For example, no survey items duplicate those already asked within the HSES, PIR, or the National Survey of Early Care and Education (NSECE, OMB #0970-0391). As described in Supporting Statement B, Section B.3, the research team catalogued potentially relevant items from existing surveys and data sources during the survey development process in part to avoid duplication.

A5. Impact on Small Businesses

The Head Start programs may be small organizations, including community-based organizations and other nonprofits. We will minimize burden for respondents by offering a web-based survey that respondents can complete at their convenience and by restricting the length of the survey.

A6. Consequences of Less Frequent Collection

This is a one-time data collection.

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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 a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on September 13, 2023 (88 FR 63792) and provided a sixty-day period for public comment. During the notice and comment period, no substantive comments were received.

Consultation with Experts Outside of the Study

Stakeholders were briefed on the study and given opportunities to provide feedback on study constructs, instrument development, and dissemination channels. For additional details on stakeholder activities, see Supporting Statement B, Section 3.

Name	Organization
Pia Caronongan	Mathematica Policy Research
Kathy Colfer (Retired)	Educare Learning Network
Lori Connors-Tadros	National Institute for Early Education Research (NIEER)
Theresa Hawley	Center for Early Learning Funding Equity
Steven Hicks	Sacramento County Office of Education
Gretchen Kirby	Mathematica Policy Research
Mindy Zapata	Southwest Human Development Head Start

A9. Tokens of Appreciation

To facilitate recruitment, the study team will provide tokens of appreciation. This is in addition to other strategies to boost survey response (see Supporting Statement B, Section B5). Recent studies, particularly since the start of the COVID-19 pandemic, have had a harder time obtaining recruiting and obtaining response rates necessary to produce valid and reliable data. For instance, Malone et al. (2023) documented that they needed to recruit a much larger pool of Head Start centers in order to meet their final sample goals.¹ Additionally, the literature demonstrates

¹Malone, L., Litkowski, E., Eiffes, B., Straske, D., Albanese, S., Xue, Y., Gonzales, K., Gilliard, R., Appel, E., & Kirby, G. (2023). *Early Care and Education Leadership (ExCELS) Data User's Guide*. OPRE Report 2023-130. Office of Planning, Research, and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services.

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that monetary tokens of appreciation increase respondent participation in research studies (Abdelazeem et al., 2022; Singer & Ye, 2013).^{2,3} Therefore, program survey respondents will be offered a total of \$52 as a token of appreciation. State survey respondents will be offered a total of \$37 as a token of appreciation. These tokens of appreciation will help mitigate nonresponse bias and ensure response rates that would result in high quality data by reducing the burden of participation. For example, we hypothesize that a token of appreciation could offset costs such as child care or data usage. Additionally, tokens of appreciation are hypothesized to alleviate the “opportunity cost” associated with participation—the potential other sources of income lost as a consequence of participating in the study (Singer & Ye, 2013). Obtaining higher response rates will increase the utility of the data for the study team, ACF, and future researchers by increasing the statistical power of the resulting data. These more successful response rates will also increase the likelihood that the resulting sample is representative of the full respondent group populations and potentially prevent the need for statistical weights.

The unique perspectives of the identified respondent groups are crucial to understanding Head Start funding models and the state contexts in which they operate. The identified respondent groups have specialized knowledge unique to their specific roles and their time is in high demand.

The total token of appreciation amounts are based on \$50 (Head Start Program Survey respondents) and \$35 (State Systems Administrator Survey respondents) worth of gift card(s) at the completion of the survey plus \$2 (presented as two \$1 bills) sent to all invited respondents in the initial mailer announcing the survey (see Attachment 1: Recruitment Scripts). Gift cards will be distributed via the Tango portal. Respondents will be able to select a gift card of their choice.

The research team proposes to conduct an experiment amongst Head Start program survey respondents to examine the effect of using a pre-token of appreciation on response rate. Previous federal projects surveying similar populations that experimented with staggered tokens of appreciation saw higher response rates when offering a small amount with the invitation and a larger amount upon survey completion. These federal projects include Assessing the Implementation and Cost of High Quality Early Care and Education Project (ECE-ICHQ; OMB #0970-0355) and Early Care and Education Leadership Study (ExCELS; OMB # 0970-0582). A recent white paper highlights their findings, finding that “a relatively small prepaid token of appreciation can significantly improve response rates” among early care and education respondents in the absence of in-person visits (Albanese et al., 2023).⁴ However, these projects were focused on very targeted recruitment efforts. For example, in the ExCELS project, they recruited a

² Abdelazeem, B., Abbas, K. S., Amin, M. A., El-Shahat, N. A., Malik, B., Kalantary, A., & Eltobgy, M. (2022). *The effectiveness of incentives for research participation: A systematic review and meta-analysis of randomized controlled trials*. *PloS one*, 17(4), e0267534. <https://doi.org/10.1371/journal.pone.0267534>

³ Singer, E., & Ye, C. (2013). *The Use and Effects of Incentives in Surveys*. *The Annals of the American Academy of Political and Social Science*, 645, 112–141. <http://www.jstor.org/stable/23479084>

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small number of Head Start programs first, and then requested survey completion among the staff within those programs. In the current study, we are seeking to conduct this experiment within the context of a census survey and believe this will be a beneficial addition to evidence base OPRE is building.

In the proposed experiment (Table 1), a stratified sample of 50% of the Head Start program survey respondent pool will be offered a \$10 gift card prior to completing the survey (pre-token). This is in addition to the two \$1 bills that all respondents will receive via mailer. The \$10 pre-token will arrive via email, and initial physical mailers will direct potential respondents to the gift card enclosed in that email. Those individuals will be offered—via recruitment scripts (See Attachment 1)—an additional \$40 upon survey completion. The other 50% of the respondent pool will be offered the full \$50 gift card amount for survey completion in all initial outreach and will not receive the \$10 pre-token. This experiment will run for the first month of data collection, at which point, the study team will assess the effectiveness of the experiment. If the pre-token approach of the experiment is successful, the control group initially offered \$50 upon survey completion will then be offered the \$10 pre-token paired with the \$40 gift card upon survey completion.

Table 1. Token of Appreciation Experiment for Head Start Program Survey - Proposed Structure by Group

Group	\$ in Initial Mailer	\$ in E-mail Invitation	\$ via Gift Card upon Survey Completion	Total
Group 1	\$2	\$10	\$40	\$52
Group 2	\$2	--	\$50	\$52

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

Personally Identifiable Information

Neither program nor state surveys will request or collect personally identifiable information (PII) as part of the survey itself. However, names and contact information will be synthesized from existing files to create a contact list for invitations to complete our surveys, and contact information will be collected for the receipt of gift cards. 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

⁴ Albanese, S M., Edwards, A., Weiss, A., Gonzalez, K., & Kirby, G. (2023). *Supporting survey response through tokens of appreciation. White paper from the Assessing the Implementation and Cost of High Quality Early Care and Education project. OPRE Research Report 2023-236*. Washington, DC: Office of Planning, Research, and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services.

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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 (see “Appendix A—Recruitment Scripts & Informed Consent”). As specified in the contract, the Contractor will comply with all Federal and Departmental regulations for private information. The research team will obtain Institutional Review Board (IRB) approval for this recruitment, consent form, data collection, and analysis processes included in this study. 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. The research team will also obtain any necessary approvals from individual Head Start programs and/or LEAs who have independent research review boards.

Due to the fact that the surveys will inquire about respondent beliefs in ways that some may consider sensitive (see A.11 for more information), the evaluation will obtain a Certificate of Confidentiality. The study team has applied for this Certificate. The Certificate of Confidentiality helps to assure participants that their information will be kept private to the fullest extent permitted by law. The Contractor has submitted informed consents to the IRB for initial feedback and will obtain approval from applicable IRB approval prior to data collection.

Data Security and Monitoring

ID numbers will be assigned to each survey respondent. Names or other identifiers are not attached to the survey data. Contact information and identifiers 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. The Contractor has developed a Data Security 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.

The Contractor is developing a Data Archiving Plan for this collection that protects respondent privacy to the extent permitted by law. They will implement the approved plan following data collection and analysis. See Supporting Statement B, Section B6 “Data Archiving” for more information.

As specified in the evaluator’s contract, the Contractor shall 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 the Contractor’s property management/control system; establish

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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 Information⁵

This study does not intend to collect PII via survey responses. However, as stated above in Section A10, some survey items will inquire about respondent beliefs in ways that some may consider sensitive. The study team will also conduct outreach using potential respondent names, emails, and work telephone numbers, which will be linked to eventual survey responses via unique identifier, accessible by the research team. All information will be protected as described in the Contractor's Data Security Plan, which states that respondent PII will be stored separately from survey responses. As noted in Section A10, IRB approval is being sought and will be obtained prior to data collection.

A12. Burden

Explanation of Burden Estimates

The program survey will be a census of Head Start program directors, inclusive of grantee and delegate programs across all 12 Head Start regions. The state ECE administrator survey will invite three state-level ECE administrators from each of the 50 states and Washington, DC to complete the survey. The study team calculated a response rate range estimate of 70-90% for each survey based on response rates of recent and similar survey data collections. Burden estimates are calculated using the upper bound of that estimate (90%). See Supporting Statement B, Section B5 "Response Rates and Potential Nonresponse Bias" for more information.

To estimate the average response time for each proposed instrument, the research 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

⁵ 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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survey. 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.

We estimate that the Program Survey of Head Start program directors will take an average of approximately 45-50 minutes to complete and the State Survey of state ECE administrators will take an estimated average of 30-40 minutes to complete. This request is for 1 year of information collection.

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 2022.

- For Head Start program directors the mean hourly wage of \$47.99 was used, based on the wage for 11-9030 “Education and Childcare Administrators.” <https://www.bls.gov/oes/current/oes119039.htm>
- For Head Start Collaboration Office Directors, lead CCDF administrators, and state pre-k administrators, the mean hourly wage of \$55.59 was used, based on the wage for 11-3012 Administrative Services Managers. <https://www.bls.gov/oes/current/oes113012.htm>

Exhibit A12.1: Burden Hours and Costs to Respondents

Instrument	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total / Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Head Start Program Survey	1,642	1	.83	1,363	\$ 47.99	\$ 65,410.37
State Systems Administrator Survey	138	1	.67	93	\$ 55.59	\$ 5,169.87
Totals:				1,456		\$70,580.24

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

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Cost Category	Estimated Costs
Field Work	\$1,650,086
Analysis	\$356,243
Publications/Dissemination	\$44,731
Total costs over the request period / Annual costs	\$2,051,060

A15. Reasons for changes in burden

This is a new information collection request.

A16. Timeline

Activity	Timing
Outreach & Recruitment	Over about 6 months, following OMB approval
Data Collection	Over about 6 months, following OMB approval
Analysis	Over about 10 months, beginning as data collection is completed
Reports	Over about 10 months, beginning as analyses are completed
Dissemination	Beginning once publications are complete, about 18 months after data collection begins

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Instrument 1: Head Start Program Survey

Instrument 2: State Systems Administrator Survey

Appendix A: Recruitment Materials