**Memorandum**

**To**: Kelsi Feltz

Office of Information and Regulatory Affairs (OIRA)

Office of Management and Budget (OMB)

**From:** Ann Rivera

Office of Planning, Research and Evaluation (OPRE)

Administration for Children and Families (ACF)

**Date**: January 30, 2024

**Subject**: Nonsubstantive Change Request – Build and Sustaining the Child Care and Early Education Workforce Study [OMB # 0970-0615]

This memo requests approval of nonsubstantive changes to the approved information collection for the Building and Sustaining the Child Care and Early Education (BASE) Study [OMB Information Collection Request 0970-0615, approved September 1, 2023].

**Background**

The BASE project aims to understand factors that affect child care and early education (CCEE) workforce dynamics, including employment recruitment, retention, and advancement, as well as to build the evidence base about strategies that may help to recruit, retain, and advance the CCEE workforce.

The proposed information collection aims to build the evidence base about the implementation, costs, and impacts of strategies aimed at improving the compensation and economic well-being of educators in child care center-based and home-based settings. The BASE project will do so by leveraging two pilot initiatives being implemented by the Colorado Department of Early Childhood (CDEC) that provide additional funding and supports to center-based child care settings to improve teacher compensation and funding for home-based child care settings to support the provision of benefits to owners (referred to as providers hereafter) and staff (referred to as assistants hereafter).

The study includes four substudies:

* **Impact Study:** 
  + **Follow-up Surveys** (Instrument 1 and 2) of center directors and lead and assistant teachers across research conditions
* **Descriptive Study:** 
  + **Follow-up Survey** (Instrument 3) of home-based child care providers and assistants across research conditions
* **Implementation Study:** 
  + **Interview Protocols** (Instruments 4 and 5) with a sample of center directors and lead and assistant teachers in the intervention condition
  + **Interview Protocols** (Instrument 6) with a sample of home-based care providers and assistants in the intervention condition
  + **Interview Protocol** (Instrument 7) with a sample of key informants in Colorado implementing agencies
* **Cost Study:** 
  + **Cost Workbook** (Instrument 8) with a sample of center-based directors or administrators across research conditions

In the center-based intervention, collection of program cost information is ongoing, utilizing the approved cost workbook. However, recruitment of center-based directors has proved challenging, given the time commitment required to complete the workbook. Since approval,the study team has recognized that offering the center-based providers an alternative to complete a shortened **cost workbook** may improve data collection efforts.

As discussed below, the team is proposing to offer directors the option of an abbreviated data collection instrument and procedure that would capture selected portions of the workbook in less time.

**The purpose of the data collection is the same as originally described in the approved OMB materials, and the methods of data collection are the same.** The changes are only meant to reduce burden on center-based directors. We believe these revisions to these study protocols will enhance the quality and amount of the data collected to address the government’s questions about the impact and implementation of workforce compensation strategies. We request a response to these proposed changes as soon as possible so that we can continue data collection for the center-based cost study.

**Overview of Requested Changes for Cost Workbook Data Collection for Center-based Providers**

The objective of the cost study is to detail the costs associated with teacher recruitment and turnover when operating a center-based child care setting and delivering services. The cost workbook is designed to collect information about time spent on activities related to educator vacancies, recruitment and hiring, and training new educators, and detailed information about salaries and fringe benefits for staff who work on these activities. The goal is to collect this information from 12 providers. The original approved cost workbook was estimated to take respondents 5 hours to complete, including a 30-minute technical assistance (TA) call with research team staff. The original procedure included research team staff walking through the workbook with respondents during the 30-minute call, checking for respondent understanding of items, and addressing any confusion about the information requested in the workbook. Since beginning data collection, respondents have on occasion opted-out of responding to the cost workbook entirely, citing the lengthy time commitment.

Our team proposes adjusting this data collection process by offering respondents two choices:

1. Conduct the full workbook and TA call (as originally approved by OMB);
2. Conduct just the 30-minute TA call with a research team staff member to complete key portions of the workbook together.

We are not proposing a change in the TA call or the workbook itself. We also do not propose a change to the originally estimated burden because we are unsure how many respondents will select the TA call only option. Instead, we are proposing a **shortened data collection process** using the existing, approved data collection materials and approved TA call—offered as an alternative for respondents. Research team staff members will be trained on which sections of the workbook to prioritize in TA calls, which are listed below in Table 1. Items identified as highest priority will be the primary focus of the TA call, while questions classified as moderate priority will be covered only if appropriate and time allows. Low priority items are unlikely to be collected as part of the abbreviated data collection option, given that the call will only last approximately 30 minutes.

To reflect the different levels of effort between the two options, we propose offering the planned $250 honorarium to respondents who choose to complete the entire cost workbook, including $200 for the time spent completing the workbook and $50 for the time spent completing the TA call. For respondents that opt to complete the TA call only, we propose offering a $50 honorarium for the time spent completing the TA call during which research team staff will assist in the completion of selected portions of the cost workbook.

**Table 1. Edits to the cost workbook for the abbreviated cost study protocol**

|  |  |  |
| --- | --- | --- |
| Cost Workbook Tab | Summary of Changes for TA Call Option | Rationale |
| 1. Instructions | | No changes |  |
| 1. Definitions | | No changes |  |
| 1. Teaching vacancies | | **Highest priorities:**   C1. Center time spent on teaching vacancies  **Moderate priorities:**  C2. Differences in time by assistant/aide  C3. Differences in time by child age  C5. Expenses (rather than time)  **Lowest priorities:**  C4. Activities borne by larger organizations  C6. Differences in expenses by assistant/aide  C7. Differences in expenses by child age  C8. Expenses borne by larger organizations  C9. Explanatory note | Research team staff will be instructed to fill in the sections on center time spent on teaching vacancies and to ask centers if they have any additional expenses spent on teaching vacancies.     The differences in time by role and age are interesting sub analyses but are not essential to answering the proposed research questions.    In most cases, the expenses borne by larger organization questions have not been relevant to the centers in the sample who have completed the cost workbook so far.   The explanatory note is no longer necessary given the transition from written to collaborative completion with a research team member. |
| 1. Recruitment and hiring | | **Highest priorities:**   D1. Center time spent on recruitment and hiring activities  **Moderate priorities:**  D2. Differences in time by assistant/aide  D3. Differences in time by child age  D5. Expenses (rather than time)  **Lowest priorities:**  D4. Activities borne by larger organizations  D6. Differences in expenses by assistant/aide  D7. Differences in expenses by child age  D8. Expenses borne by larger organizations  D9. Explanatory note | Same as row C. |
| 1. Training and onboarding | | **Highest priorities:**   E1. Center time spent on training and onboarding  **Moderate priorities:**  E2. Differences in time by assistant/aide  E3. Differences in time by child age  E5. Expenses (rather than time)  **Lowest priorities:**  E4. Activities borne by larger organizations  E6. Differences in expenses by assistant/aide  E7. Differences in expenses by child age  E8. Expenses borne by larger organizations  E9. Explanatory note | Same as row C. |
| 1. Pilot activities (Treatment centers only) | | **Highest priority:**   F1. Center time spent completing application materials  F2. Center time spent processing lead and assistant teachers/aides’ opt-in/opt-out decisions  F3. Center time spent on monthly reporting requirements of the pilot initiative  F4. Center time spent on monthly pilot initiative wage supplements | No changes. |
| 1. Salaries | | **Lowest priority:**  G1. Staff salaries  G2. Payroll tax & fringe benefits  G3. Additional benefits  G4. Explanatory note  G5. Changes to salaries & benefits | Because we will use standardized wages and because salary data are available from other data sources being collected as part of the study, this section can be removed to free up time in the call for higher priority questions. |
| 1. Your Center | | **Highest Priority:**  H4. Number of educators that ended their employment since January H5. Number of weeks to fill vacancies    **Moderate Priority:**  H6. Number of educators hired since January  H7. Number of current vacancies   **Lowest priority:**  H1. Number of classrooms open since January  H2. Number of educators employed in January  H3. Current number of educators employed today | Information on turnover and time to fill positions is sufficient for the cost study, additional data in this section is not essential to answer the proposed research questions and can be down prioritized as needed. |