

**The National Technical Assistance Center for
Preschool Development Grants B-5
Parent and Early Childhood Partner Groups**

**Administration for Children and Families Generic for
Engagement Efforts**

0970 – 0630

**Supporting Statement Part A
Justification**

May 2024

Submitted By:
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Administration for Children and Families
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A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval to collect information from parents/family members/ guardians and early childhood care and education professionals to learn more about the early childhood program services and experiences of those who benefit from ACF funds. The focus of this particular data collection effort is to understand the lived experiences of those who access HHS and ACF birth through five (B-5) mental health supports and services. This area is recognized as a priority by the administration and supports recent efforts to inform the public on *the importance of social-emotional development and infant and early childhood mental health (IECMH)*.

Background

In an effort to embed the President's Executive Order (EO), on *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (EO 13985) and the Presidential Memorandum on *Restoring Trust in Government through Scientific Integrity and Evidence-Based Policy Making*, and the administrations recent efforts to increase awareness on children's mental health through the dissemination of both the *Joint ED and HHS Dear Colleague Letter* and the *HHS Letter on Children's Mental Health*, the Office of Early Childhood Development has contracted with Manhattan Strategy Group as the National Technical Assistance Center for Preschool Development Grants B-5 (PDG B-5 TA Center) to implement training and technical assistance (T/TA) activities that support states and territories in implementing their PDG B-5 grants. As an additional support to the Office of Early Childhood Development, the PDG B-5 TA Center is charged with establishing and supporting early care and education (ECCE) communications with external stakeholders, including parents and early childhood care and education professionals enrolled within or work within ACF programs.

Consistent with the referenced guidance documents listed above, and to ensure involvement with a variety of people, including parents and early childhood professionals with diverse experiences with ACF programs, the PDG B-5 TA Center and their subcontractor Zero to Three (ZTT) will actively collect information using the questions proposed in this request with parents/family members/ guardians and early childhood care and education professionals who participate in National Parent or Early Childhood Professional Partner Group (Partner Group) meetings facilitated by the PDG B-5 TA Center and ZTT. Meetings are currently planned for May 18, 2024.

This proposed information collection is necessary work to help ACF gain a better understanding of processes, needs, and potential improvements related to technical assistance and support to PDG B-5 grantees at the state level who are working to improve B-5 early childhood coordination and collaboration.

Legal or Administrative Requirements that Necessitate the Collection

There are no legal or administrative requirements that necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Use

The purpose of the proposed questions for the Partner Group meetings, is to gather participant lived experiences related to ACF early childhood mental health supports and services. Information collected will be used to support TA plans, and materials that will assist PDG B-5 grantees in enhancing state policies and procedures that result in improving the experiences of children and families in accessing early childhood mental health supports and services, as well as improving ECCE professionals' experiences while working within those same programs and services. Presentations based on the findings will be shared with federal leadership, the Integrated Project Team (IPT), federal staff, grantees, and other national T/TA professionals. Due to the small group of anticipated participants for each partner group (10 -12 participants), limitations on the data collected is due to the small group size and focus of the discussions will be noted in all findings and products resulting from this work, as appropriate.

At the conclusion of the meeting the PDG B-5 TA Center and ZTT will assess the level of participation and effectiveness of the meeting. They will also collect feedback from the participants on their perception of respectful and supportive meeting facilitation.

This proposed information collected meets the goals and uses of the ACF generic clearance for engagement efforts (0970-0630):

- Gathering information from individuals with diverse experiences and perspectives to inform ACF policies and programs.
- Informing program improvements
- Informing program implementation

Overview of Information Collections

Information Collection Title	Respondent, Content, Purpose of Collection	Mode and Duration
Instrument 1: Experiences in accessing or supporting B-5 social-emotional development and infant and early childhood mental health (IECMH)	Respondents: Family/parent or early childhood professionals Content: Discussion Questions on social-emotional development and infant and early childhood mental health supports and services. Purpose: To inform the PDG TA center on areas of needed TA to PDG B-5 Grantees.	Mode: Web/Virtual meeting Duration: 1 Hour
Instrument 2: PDG B-5 Parent and Early Childhood Professional Partner Group Feedback Survey	Respondents: Family/parent or early childhood professionals Content: Feedback survey questions Purpose: To ensure that they believe their cultures/lived experiences/beliefs & values were respected and supported.	Mode: Email Duration: 5 minutes

Processes for Information Collection

National partner group meetings will take place virtually in May 2024. During the meetings, the PDG TA Center's subcontractor ZTT will facilitate informal discussions using the list of questions included in Instrument 1: Discussion Questions for May 2024 PDG B-5 Working Partner Meeting. There are two sets of questions, one for ECE professionals and one for families of children birth through five.

Responses to the proposed discussion questions will be summarized by ZTT. The PDG TA Center will share the de-identified collected information with federal staff and the IPT.

A3. Improved Information Technology to Reduce Burden

Participants are required to have a form of high-speed electronic access (phone, laptop, tablets, etc.) in order to participate in each of the virtual meetings. Information will be sent by email prior to the meetings. Participants will submit their evaluation of the meetings via email (See Instrument 2).

A4. Efforts to Identify Duplication

Information proposed to be collected through the Partner Groups is currently non-existent and is not collected elsewhere. Information will be collected for the specific purpose of supporting PDG B-5 grantees, and information on the experiences and utilization of ACF programs and services accessed by families and early childhood professionals working within those programs.

A5. Involvement of Small Organizations

The collection of information during each of the Partner Meetings will not impact small businesses.

A6. Consequences of Less Frequent Data Collection

This is a one-time request for information.

A7. Special Circumstances

There are no special circumstances for the proposed data collection efforts.

A8. Federal Register Notice and 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 request for a new umbrella generic clearance. The notice was published on December 11, 2023, (88 FR 85890), and provided a sixty-day period for public comment. ACF did not receive any comments on the first notice. A second notice was published, allowing a thirty-day period for public comment (89 FR 12352), in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice.

Consultation with Outside Experts

Consultation in the establishment and support of the Parent and Professional Partner Groups has been limited to the staff in the Office of Early Childhood Development and IPT in coordination with the PDG B-5 TA Center and their subcontractor ZTT.

A9. Tokens of Appreciation for Respondents

It is extremely important to provide those with lived experience, experts, staff, and others providing their feedback for these efforts with equitable compensation or tokens of appreciation for participation. As noted in a 2022 report by the Office of the Assistant Secretary for Planning and Evaluation¹ this “helps ensure a diverse population with varied views can participate.” As such, we plan to provide Honoraria to respondents, as described in section A13.

A10. Privacy of Respondents

Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their discussions and information will be kept private to the extent permitted by law. No personal identifying information is collected.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

A11. Sensitive Questions

The proposed array of questions for parents may be considered sensitive as they focused on infant and early childhood mental health (See Instrument 1). The questions posed for the Parent Partner group ask parents how they see their child's social-emotional development, ask if there are any concerns they may have, how the program has supported their family, etc. The questions do touch on a child's individual social emotional and mental health development (typical or atypical) and any particular mental health supports they may be in need of. The Partner Groups have been intentionally created to ensure a safe space for all conversations for both Parents and Providers. Respondents will be informed that they do not need to respond to any questions they would prefer not to answer (See Instrument 1).

A12. Estimation of Information Collection Burden

Burden Estimates

The Parent and Professional Provider Partner Group meetings will consist of specific discussion questions (see Instrument 1), and each meeting will take no more 60 minutes.

Post meeting feedback survey will be distributed at the end of the meeting (see Instrument 2). The survey is estimated to take an average of 5 minutes to complete.

Cost Estimates

¹ chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://aspe.hhs.gov/sites/default/files/documents/230a8fe8986f162910b9f29f6d050f35/Recruiting-Lived-Experience.pdf

The cost to family member respondents was calculated using the [Bureau of Labor Statistics \(BLS\) median weekly earnings of full-time workers](#), which was \$1,145 in the fourth quarter of 2023. (\$1,145/40 = \$28.625/hr.). To account for fringe benefits and overhead the rate was multiplied by two which is \$57.25.

The Bureau of Labor Statistics separates preschool teacher (job code 25-2011, May 2023 hourly wage \$19.91) and child care teacher (job code 39-9011, May 2023 hourly wage \$15.42) so for the professional partners, we are using the average of the two, since we will have both represented. (Average hourly salary of preschool teacher and child care teacher = \$17.665). To account for overhead and fringe benefits, we multiplied by 2 for an estimate of \$35.33/hour.

https://www.bls.gov/oes/current/oes_stru.htm

Instrument	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Discussion questions – family partner group	15	1	1	15	\$35.33	\$529.95
Discussion questions – professionals partner group	15	1	1	15	\$57.25	\$858.75
Post meeting feedback- family partner group	15	1	.083	1	\$35.33	\$35.33
Post meeting feedback – professional provider partner group	15	1	.083	1	\$57.25	\$57.25
Total Burden and Cost Estimates:				32		\$1,491.28

A13. Cost Burden to Respondents or Record Keepers

Directly engaging the communities ACF serves and including these individuals in ACF research is in line with the following priorities of the current Administration and HHS:

- *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (EO 13985)*
- *Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*
- *Presidential Memorandum on Restoring Trust in Government through Scientific Integrity and Evidence-Based Policy Making*
- *Joint ED and HHS Dear Colleague Letter*
- *HHS Letter on Children's Mental Health*
- *ACF Evaluation Policy*
- *HHS Strategic Plan FY 2022-2026,*
- *ASPE's Methods and Emerging Strategies to Engage People with Lived Experience (2021)*

- ASPE's *Recruiting Individuals with Lived Experience* (2022)

As noted in the 2022 report by ASPE this “helps ensure a diverse population with varied views can participate.” Additionally, in an earlier report it was noted that “Providing [those with lived experience] with compensation commensurate with the rates that other experts—i.e., experts engaged based on their expertise as practitioners or researchers, rather than lived experience—receive helped recognize the valuable and unique expertise that people with lived experience lend, which promoted meaningful engagement.” The report goes on to specify that not doing so could result in “unintended consequences.... when lived experience engagements have scarce resources and experts are undercompensated, which can undermine, disregard, and/or marginalize people with lived experience.”

Equitable compensation is in line with leading practices for ethical engagement of those with lived expertise and advancing equity for populations who have been historically underserved (as noted in section A1, advancing equity is a priority, as highlighted in the referenced EOs in that section). Providing equitable compensation recognizes the value of the time provided by participants, helps to remove barriers to participation, and affirms that the contributions from those with lived experience are as valuable as those from other experts.

Consistent with the guidance documents referenced, and to ensure involvement with a variety of people with diverse experiences and perspectives in relevant fields, we propose to offer participants an honorarium for their time spent providing their expertise and experience. Specifically, we propose to offer \$100 per hour.

The proposed honoraria amount is based on the approach taken and recommended by the National Center on Parent Family and Community Engagement (NCPFCE), which is the TA center for Head Start. NCPFCE's standard approach is to provide an honorarium to family partners for sharing their expertise and lived experience. Appendix A (OHS NCPFCE Family Expertise Lived Experience Compensation) provides information about their approach and support for the proposed honoraria for these discussions. The determined rate recognizes family contributions as comparable to those of other subject matter experts. Family experts receive an honorarium commensurate with that of other subject matter experts. Honoraria are calculated based on the following formula, which includes the time involved in planning, preparation, the activity, and potential follow-up:

- Contribution rate: \$75.00/hour
- Child care rate: \$25.00/hour
- Total rate: \$100.00/hour

A14. Estimate of Cost to the Federal Government

The total cost for the data collection activities under this current request will be \$1,398.70.

A15. Change in Burden

This is for an individual information collection under the umbrella generic clearance for ACF engagement activities (0970-0630).

A16. Plan and Time Schedule for Information Collection, Tabulation and Publication

The proposed meetings are planned for late May 2024. After the meetings, information from the discussions will be summarized in a final report for the purpose of informing PDG B-5 TA Center activities, federal leadership staff and the IPT. This is expected to be produced by June 2024. No other publication is anticipated. Any limitations on the data collected will be limited to the small group of respondents.

A17. Reasons Not to Display OMB Expiration Date

All instruments will display the expiration date for OMB approval.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.

Attachments Provided

- Instrument 1 – Proposed Questions for the Parent and Professional Provider Partner Groups
- Instrument 2 – Post-meeting Feedback Survey
- Appendix A – Office of Head Start National Center of Parent Family and Community Engagement (NCPFCE) Family Expertise and Lived Experience Compensation