

# **Building and Sustaining the Child Care and Early Education (BASE) Workforce**

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

**0970 – 0630**

### **Supporting Statement Part A**

#### **Justification**

**November 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) Office of Planning, Research, and Evaluation (OPRE) proposes to collect information from interested parties and experts in the child care and early education (CCEE) field to inform the framing, interpretation, and dissemination of findings from an evaluation of a state-sponsored teacher salary increase pilot.

### **Background**

The Presidential Memorandum on Restoring Trust in Government through Scientific Integrity and Evidence-Based Policy Making, the Department of Health and Human Services (HHS) Strategic Plan FY 2022-2026, and the ACF Evaluation Policy discuss community engagement and inclusion in research. Consistent with these guidance documents, and to ensure meaningful involvement with a variety of individuals with diverse experiences and perspectives, ACF conducts active engagement activities to inform various efforts, including research and evaluation. Hearing the perspective of those affected by, experienced in, interested in, or potentially interested in ACF programs and similar programs is vital to ensure ACF is responsive to the needs of those it serves and that resources are, and programming is appropriate, useful, and relevant for audiences.

This request is specific to engagement activities to inform the interpretation and reporting of findings from an OPRE study of the Colorado Child Care Assistance Program (CCCAP) Teacher Salary Increase Pilot (OMB #0970-0615), a pilot initiative that aims to improve the compensation of child care and early education (CCEE) educators in Colorado, as part of the Building and Sustaining the Child Care and Early Education Workforce (BASE) project.

Colorado's CCEE educators have higher poverty rates than workers from other industries and often rely on public assistance or take a second job to help make ends meet.<sup>1</sup> Low pay also makes it challenging to recruit qualified individuals and to encourage them to stay in CCEE jobs, both of which affect the quality of care and continuity of care provided to children.<sup>2</sup>

The Colorado Department of Early Childhood (CDEC) is conducting a livable wage pilot for center-based child care teachers serving children birth through age five (the "center-based pilot initiative"), specifically designed to improve the compensation of lead and assistant teachers in center-based child care settings. The Colorado pilot initiative provides increased monetary resources to eligible CCEE center-based child care settings that are earmarked for educators' compensation. In turn, these settings will allocate these resources to CCEE educators' wages. The pilot initiative provides a unique opportunity to build the evidence base about strategies aimed at recruiting, retaining, and advancing the CCEE workforce by improving their compensation and economic well-being.

ACF proposes to solicit much needed feedback from experts and interested parties in the CCEE field on the cost, implementation, and outcomes findings that have emerged from the evaluation of the pilot

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<sup>1</sup> McLean, C., Austin, L.J.E., Whitebook, M., & Olson, K.L. (2021). Early Childhood Workforce Index – 2020. Berkeley, CA: Center for the Study of Child Care Employment, University of California, Berkeley. Retrieved from <https://cscce.berkeley.edu/workforce-index-2020/report-pdf/>.

<sup>2</sup> Vogtman, Julie. 2017. *Undervalued: A Brief History of Women's Care Work and Child Care Policy in the United States*. Washington, DC: National Women's Law Center.

initiative. This information will help to inform the interpretation and dissemination of research findings from the evaluation of the pilot initiative. Hearing the perspective of those affected by, experienced in, interested in, or potentially interested in ACF programs and similar programs is vital to ensure ACF is responsive to the needs of those it serves and that resources are, and programming is appropriate, useful, and relevant for audiences.

### ***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 primary purpose of this information collection is to ensure individuals with diverse experiences and perspectives are involved in informing the interpretation and dissemination of research findings from the evaluation of the pilot initiative. We plan to share findings from the evaluation and ask respondents to react to the findings through a guided discussion (see Instrument 1 and Instrument 2 for discussion questions). By engaging experts and various interested parties with lived experience in the CCEE field, the team aims to strengthen efforts to contextualize the cost, implementation, and outcome findings and share study findings with audiences in ways that are relevant and useful.

The intended uses of the information include incorporating expert and interested parties' perspectives and recommendations into the framing of study findings, as well as tailoring dissemination strategies and products to reach a broad and interested audience.

This proposed information collection 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 the development and dissemination of resources and products developed under ACF studies, regulatory activities, guidance, outreach and/or training activities.

### ***Overview of Information Collections***

<b><i>Information Collection Title</i></b>	<b><i>Respondent, Content, Purpose of Collection</i></b>	<b><i>Mode and Duration</i></b>
BASE Expert Discussion Questions	<p><b>Respondents:</b> Experts in CCEE Research</p> <p><b>Content:</b> Review of final report outline and discussion of reactions to and interpretations of implementation, impact, and cost findings from evaluation.</p> <p><b>Purpose:</b> To solicit feedback on interpretation and dissemination of study findings from experts in the CCEE field.</p>	<p><b>Mode:</b> Web</p> <p><b>Duration:</b> 90 mins (and about 3 hours of prep time)</p>
BASE Interested	<b>Respondents:</b> Representatives from state & local CCEE oversight	<b>Mode:</b> Web

Parties Discussion Questions	<p>agencies, national and local training and TA centers and TA providers, special interest/advocacy groups, membership organizations focused on CCEE workforce, and developers of workforce strategies</p> <p><b>Content:</b> Presentation of center-based pilot initiative and study, followed by small group discussion of findings and framing.</p> <p><b>Purpose:</b> To solicit feedback on interpretation and dissemination of study findings from interested parties in the CCEE field.</p>	<b>Duration:</b> 90 mins
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### ***Processes for Information Collection***

#### **Expert Engagement**

The team plans to engage up to 7 experts in the CCEE field in a structured, 90 minute Zoom conversation. Invitations will be sent to experts 6-8 weeks ahead of the meeting to determine a preferred date and time. If the team is unable to identify a time that is feasible for all invitees to attend, separate one-on-one conversations, likely lasting 30-60 minutes, may be planned to accommodate schedules for those who are unable to join the main engagement.

In advance of the virtual meeting, invitees will receive materials to review in preparation for the discussions. The materials will include background information about the study and the discussion questions.. The conversation will include full group and smaller break out group discussions, facilitated by the project team. Invitees will be invited to share written feedback, if desired, and notes will be taken by the project team during the engagement to capture information shared.

#### **Interested Parties Engagement**

The team plans to engage up to 20 interested parties through a 90 minute virtual convening. Initial invitations will be sent to targeted interested parties 3-4 weeks ahead of the convening, with up to two follow-ups if no reply is received. A second round of invitations will be sent approximately 1 week later, if the maximum number of attendees has not been reached. A description of the project will be shared with all invitees. As we plan to invite a large group of potential informants, the date and time of the convening will be set; we will not be asking invitees to share their availability. We will, however, ask invited informants to provide contact information when registering for the convening to enable the team to monitor the number of attendees and ensure we are able to provide honoraria to all attendees. We will indicate that, if the recipient does not feel they are the most appropriate person at their organization to participate, they are invited to identify an alternate.

The invitation email will include a link to register for the convening. The registration process will allow us to track anticipated participation in the engagement. If we see that we are lacking representation from a particular category of respondent, we will conduct additional outreach to members of that group. There will be no materials provided for review in advance. The convening will include a presentation and small group break out discussions. Notes will be taken by the project team during the engagement to capture information shared.

### **A3. Improved Information Technology to Reduce Burden**

Engagements will be conducted virtually using a video-conferencing platform. Experts will be invited to share written feedback via email, if desired, however this is not a requirement of their involvement. Tools such as Chat, polls, and Mural may be used as additional formats to actively engage experts and to aid in information collection, and thorough notes will be taken to capture the information shared by experts and any decisions made in response to the conversation.

#### **A4. Efforts to Identify Duplication**

To date, no study has systematically tested the effects of an initiative that aims to improve compensation of the CCEE workforce in center-based child care settings via random assignment, nor have implementation studies and cost studies about these types of strategies in CCEE settings been conducted. Similarly, there have been no similar data collections from experts, interested parties, and other interested parties to inform the interpretation of findings from such a study.

#### **A5. Involvement of Small Organizations**

The data collection efforts outlined here may involve small businesses, such as a representative of a center-based child care setting that is independently operated. Efforts will be taken to minimize the burden on these small businesses, such as scheduling in-person/videoconference data collection at a convenient time for them.

#### **A6. Consequences of Less Frequent Data Collection**

This is a one-time data collection.

#### **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***

No consultations have taken place with experts outside of the project team.

#### **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 Evaluation<sup>3</sup> 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**

We will collect names and contact information for invitees. This information will be used for communication regarding the discussions and to provide honoraria to attendees. 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.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier. Information stripped of personal identifiers will be kept in electronic format by MDRC in a secure location.

#### **A11. Sensitive Questions**

Topic areas for data collection are unlikely to be considered of a sensitive nature to respondents. Respondents will be reminded that their participation in engagement discussions is voluntary, they may skip any questions they do not wish to answer, and that their answers will be protected to the extent permitted by law.

#### **A12. Estimation of Information Collection Burden**

##### ***Burden Estimates***

For Interested Party respondents, we estimated burden by considering the length of time allotted for the discussions (1.5 hours). The number of respondents is based on participation at prior interested party engagements and the project resources. For Expert respondents, burden assumes time for their review of the final report outline (2.5 hours) and its accompanying cover letter with discussion questions (.5 hours), as well as time to participate in the group discussion with the team (1.5 hours). The number of respondents is based on participation in prior expert engagements. This is a one-time data collection.

##### ***Cost Estimates***

The cost to Interested Party respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Community Service Managers [11-9151] and wage data from May 2023, which is \$40.10 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$80.20. The cost to Expert respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social Scientists and Related Workers [19-3099] and wage data from May 2023, which is \$49.14 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$98.28.

[https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm)

Instrument	Total	Total	Average	Total	Average	Total
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	Number of Respondents	Number of Responses Per Respondent	Burden Hours Per Response	Burden Hours	Hourly Wage	Annual Cost
Interested Parties Discussion Sessions	20	1	1.5	30	\$80.20	\$2,406.00
Expert review of report outline & discussion questions	7	1	3	21	\$98.28	\$2,063.88
Expert Discussion Sessions	7	1	1.5	10.5	\$98.28	\$1,031.94
Total Burden and Cost Estimates:				61.5		\$5,501.82

### 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:

- Presidential Memorandum on *Restoring Trust in Government through Scientific Integrity and Evidence-Based Policy Making*,
- ACF Evaluation Policy,
- HHS Strategic Plan FY 2022-2026,
- ASPE's *Recruiting Individuals with Lived Experience* (2022)

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 \$60 to Interested Party respondents, given the time commitment need to participate in the virtual convening and \$500 to Expert respondents, given the time commitment required to review the draft of findings and methods and provide comments.

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.

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.”

**A14. Estimate of Cost to the Federal Government**

The total cost for the data collection activities under this current request will be \$25,000. This includes staff labor to prepare, attend, and follow-up on two engagements (Interested Parties convening and Expert meeting) and honorarium.

**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**

Exhibit A16.1 provides the anticipated time schedule for this information request, pending approval. Ideally, data collection would begin in November 2024. Information from this convening will be used to inform the development of future dissemination products, such as the final evaluation report and conference presentations.

**Exhibit A16.1 Anticipated Timeline**

Activity	Anticipated Dates
<b>Data Collection</b>	
Conduct virtual convening with Interested Parties	November 2024
Distribute report outline and discussion questions for review in advance of virtual call with Experts	November 2024
Conduct virtual meeting with Experts	November 2024
<b>Reporting</b>	
Revision of report outline, prepare report drafts 1 & 2, and finalize report for publication & dissemination	November 2024-September 2025

**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**

Appendix A: Outreach Materials

Instrument 1: Expert Discussion Questions

Instrument 2: Interested Party Discussion Questions