

Financing for ECE Quality and Access for All (F4EQ)

Formative Data Collections for ACF Research

0970 - 0356

Supporting Statement

Part A

OCTOBER 2024

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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 generic information collection under the umbrella generic, Formative Data Collections for ACF Research (0970-0356).
- **Description of Request:** 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) proposes to conduct key informant interviews amongst (1) state early care and education [ECE] agency staff, and (2) local ECE coordinating entity [LCE] staff. These key informant interviews will supplement an ongoing environmental scan of state and local/regional ECE governance structures and policies. The collected data will be used solely to inform sampling and recruitment for future case studies, to be submitted for approval as a full information collection request which is in the development stages (comment periods to begin fall 2024). The collected data are not intended to be generalized to a broader population. 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 and contract timeline, sampling data and criteria must be finalized in early winter 2025.

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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.¹ Bringing together, using, or *coordinating* (at the systems level) these various funding streams requires cooperation across different levels of the ECE system² and we theorize has critical implications for program quality, workforce strength, and equity in access and outcomes for young children and their families.³ However, very little is known about how Head Start program funding approaches are shaped by system-level approaches and structures, particularly those that involve intermediaries between states and ECE programs.⁴ These intermediaries, henceforth referred to as “local coordinating entities,” or LCEs, are statutorily established, state-based local/regional structures that may be tasked with funding source administration, oversight, or technical support roles.

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 programs’ use of multiple funding sources and the state policy contexts in which Head Start programs make financing decisions. To supplement and expand upon the project’s review of the knowledge base, policy scan, and survey data collection (OMB #0970-0623), the research team plans to conduct two multi-case studies that span Head Start programs, state ECE agencies, and LCEs to address identified knowledge gaps (full request for OMB approval forthcoming; comment periods to begin fall 2024). To support the selection of states and LCEs for those case studies, the research team proposes the following key informant interviews to clarify or supplement information relevant to sampling that cannot be made clear using publicly available data. There are no legal or administrative requirements that necessitate this collection. ACF is undertaking the collection at the discretion of the agency.

¹ Gonzalez, K., & Caronongan, P. (2021). *Braiding federal funding to expand access to quality early care and education and early childhood supports and services: A tool for states and local communities*. U.S. Department of Health and Human Services. <https://aspe.hhs.gov/reports/early-childhood-braiding>

² Banghart, P., Cook, M., Bamdad, T., Carlson, J., & Lloyd, C. M. (2019). *Early Head Start-Child Care Partnerships: Annotated bibliography*. Child Trends. https://cms.childtrends.org/wp-content/uploads/2019/01/EHS_CCP_Annotated-Bibliography_ChildTrends_January2019.pdf; Gonzalez & Caronongan, 2021; Potter, H. (2021). *We must seize the opportunity for integration in Universal Pre-K*. The Century Foundation. <https://tcf.org/content/report/must-seize-opportunity-integration-universal-pre-k/?agreed=1>

³ Banghart et al., 2019; Bernstein, S., Reid, N., Harrington, J., & Malone, L. (2022). Head Start’s interaction with federal, state, and local systems (Report No. 2022-12). U.S. Department of Health and Human Services. <https://files.eric.ed.gov/fulltext/ED622889.pdf>; Maxwell, K., Warner-Richter, M., Partika, A., Franchett, A., & Kane, M. (2019). *The connection between head start and state or territory early care and education systems: A scan of existing data* (Report No. 2019-73). U.S. Department of Health and Human Services. https://www.acf.hhs.gov/sites/default/files/documents/opre/ccepra_head_start_and_ece_connections_aug_2019.pdf;

National Research Council. (2015). *Transforming the workforce for children birth through age 8: A unifying foundation*. The National Academies Press. <https://nap.nationalacademies.org/catalog/19401/transforming-the-workforce-for-children-birth-through-age-8-a>

⁴ Blevins, D., Bucher, E., Kabourek, S. Stein, A.G., Ehrlich Loewe, S.B., Barrows, M.B., & Wallen, M. (2024). *Coordinating funding in early care and education: Initial study findings and next steps from the F4EQ project*. OPRE Report #2024-117. 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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A2. Purpose

Purpose and Use

The purpose of the proposed key informant interviews will be to **(1)** confirm the accuracy of information collected from publicly available data sources to be used for sampling, **(2)** fill remaining knowledge gaps after publicly available data sources have been exhausted, and **(3)** inquire about which ECE administration roles within a state would be most appropriate to interview for future case studies. The data collected will inform the selection of states and LCEs in future case studies which will be submitted as a full information collection request in early 2025.

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.

Guiding Questions

1. What information about state ECE system characteristics—including governance structures, rules & regulations, and ECE funding processes—are not clearly recorded in publicly available data sources?
2. What are the most appropriate roles within state ECE agencies and local ECE coordinating entities to participate in case study interviews around the use of multiple funding sources in ECE programs?

Study Design

The research team will conduct key informant interviews (KIIs) to address the guiding questions of this study. KIIs are a qualitative research method used to gather detailed insights from individuals who have specific knowledge or expertise on a particular subject or within a community. These individuals, known as key informants, are often leaders, practitioners, or community members who possess in-depth knowledge due to their position, experience, or relationships within the target population. The purpose of KIIs is to obtain rich, context-specific information that may not be accessible or clear through quantitative methods, surveys, or document review.⁵ This approach will allow the research team to gain clarity and nuanced descriptions of ECE public policy and administrative implementation that may not be clearly written down and published via public sources.

⁵ Akhter S. Key Informants' Interviews. In: Islam MR, Khan NA, Baikady R, eds. *Principles of Social Research Methodology*. Springer Nature Singapore; 2022:389-403. doi:[10.1007/978-981-19-5441-2_27](https://doi.org/10.1007/978-981-19-5441-2_27)

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Through an initial environmental scan of publicly available data sources, the research team identified 29 states as potential candidates for future case study selection. The research team proposes to conduct KIIs to confirm, clarify, or fill in information identified through the environmental scan. We propose up to 29 interviews to allow for the potential of at least one interview per state. For those states where information is readily available and clearly defined in publicly available data sources, the research team may choose not to conduct a KII. For those states where multiple individuals within one or more state agencies may hold the necessary knowledge, the research team may choose to conduct more than one key informant interview; however, the research team will not exceed a total of 29 total interviews.

<i>Data Collection Activity</i>	<i>Instrument</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
One-time semi-structured key informant interviews with staff	Instrument 1 – Key Informant Interview Protocol	Respondents: 29 state ECE agency administrators and staff, LCE administrators and staff Content & Purpose: The interview guides are flexibly designed to allow the research team to confirm the accuracy of or fill in gaps in information gathered through publicly available data sources, as well as inquire about the most appropriate roles within each state and/or LCE to participate in future case studies around the use of multiple funding sources within ECE programs.	Mode: Virtual, semi-structured interview Duration: 60 minutes

One of the primary limitations of KIIs is the potential for selection bias. Since the method relies on purposively selecting individuals with specific expertise or knowledge, the information gathered may reflect the views of a small, non-representative segment of the population.⁶ Thus, these key informant interviews will not be representative of or generalizable to the broader population of ECE staff within a single state or across states. To compensate for the potential subjectivity of key informant interview responses, the research team will cross check information across available data sources.

Other Data Sources and Uses of Information

The research team will also collect sampling information from the project's review of the knowledge base, policy scan, and nationwide surveys (OMB #0970-0623), as well as publicly available data through the Office of Head Start's Program Information Report (PIR) (OMB #0970-0427) and the US Department of Education's Common Core of Data (CCD EdFacts) (OMB #1850-0925). Sampling information also includes non-governmental and administrative data from the National Institute for Early Education Research (NIEER), the National Head Start Association (NHSA), state statutes, and various state and local government websites. In cases where the

⁶ McKenna, S. A., & Main, D. S. (2013). *The role and influence of key informants in community-engaged research: A critical perspective*. Action Research, 11(2), 113-124. <https://doi.org/10.1177/1476750312473342>

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research team cannot find information, or finds conflicting information, across these sources, the research team will consider conducting a KII with agency staff in that state to fill in gaps or clarify inconsistencies.

A3. Use of Information Technology to Reduce Burden

The research team will employ information technology as appropriate to reduce the burden on respondents who agree to participate. We will conduct data collection efforts via a video or conference call at convenient times for respondents.

With respondent consent, all interviews will be recorded and transcribed, reducing burden by not needing to confirm responses post-data collection (which would require additional respondent time) and by not needing to pause for notetaking, which also minimizes the time needed during the interviews.

A4. Use of Existing Data: Efforts to reduce duplication, minimize burden, and increase utility and government efficiency

The proposed key informant interviews do not duplicate any other work being done by ACF and do not duplicate any other data sources. The purpose of this data collection is to better inform the quality of future ACF research, which includes the research team's anticipated future case studies. To prepare for these multi-case studies, the research team has conducted an online review of available documentation, including administrative data, legislation, and policy documents. Further information is needed to confirm the accuracy of and supplement the publicly available information about the policies, structures, and supports at the state and local/regional level for ECE programs related to using multiple funding 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

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agency's intention to request an OMB review of the overarching generic clearance for formative information collection. This first notice was published on August 11, 2023 (88 FR 54614) and provided a sixty-day period for public comment. The second notice published on December 14, 2023 (88 FR 86656) and provided a thirty-day period for public comment. ACF did not receive any substantive comments.

Consultation with Experts Outside of the Study

Policy, practice, and research experts were briefed on the study and given opportunities to provide feedback on study constructs, instrument development, and dissemination channels.

Name	Organization
Pia Caronongan	Mathematica Policy Research
Jeanna Capito	Prenatal to Five Fiscal Strategies
Lori Connors-Tadros	National Institute for Early Education Research (NIEER)
Theresa Hawley	Center for Early Learning Funding Equity
Mindy Zapata	Southwest Human Development Head Start

A9. Tokens of Appreciation

No tokens of appreciation will be offered.

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 all state ECE agency staff in positions to answer questions about the research team's future case study sampling criteria. We will collect this information from publicly available contact information on state agency websites. Contact information will also be collected for the receipt of honorarium. No other personally identifiable information will be collected.

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

Assurances of Privacy

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. As specified in the contract, the Contractor will comply with all Federal and Departmental regulations for private information.

Informed consent will be obtained from participants to ensure that they understand the nature of the research being conducted, that their participation is voluntary,

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and their rights as participants (see introductory text within “Instrument 1 – Key Informant Interview Protocol”). The consent script will be read aloud during interviews. The research team will obtain verbal informed consent. With respondent permission requested in the consent script (Instrument 1), the research team will audio-record and transcribe interviews.

The research team will obtain Institutional Review Board (IRB) approval prior to beginning data collection. 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 stage agencies or local coordinating entities who have independent research review boards.

Data Security and Monitoring

ID numbers will be assigned to each key informant respondent. Names or other identifiers are not attached to the interview data. Contact information and interview data 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 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 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 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 Information⁷

⁷ 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.,

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This information collection does not intend to collect sensitive information. The proposed protocol (see “Instrument 1 – Key Informant Interview Protocol”) asks about government agency policy and implementation. All information will be protected as described in the Contractor’s Data Security Plan, which states that respondent PII will be stored separately from transcripts. As noted in Section A10, IRB approval is being sought and will be obtained prior to data collection.

A12. Burden

Explanation of Burden Estimates

To estimate the average response time for each proposed instrument, the research team reviewed the respondent protocol internally and considered the maximum number and type of questions for each respondent. Interviews are designed to last 60 minutes. No interview will extend past 60 minutes. 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 propose up to 29 interviews to allow for the potential of at least one interview per state.

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 is Bureau of Labor Statistics, Occupational Employment and Wages, May 2023. For state and local ECE administrators, the mean hourly wage of \$58.27 was used, based on the wage for 11-3012 Administrative Services Managers.

<https://www.bls.gov/oes/current/oes113012.htm>

Exhibit A12.1

Instrument	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
Instrument 1 – Key Informant Interview Protocol	29	1	1	29	\$58.27	\$1,689.83

A13. Costs

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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Honoraria in the amount of \$50 will be provided directly to participants as a token of appreciation for their expertise and time participating in the proposed 60-minute interviews. These honoraria are appropriate for these professionals as they have the specialized knowledge and perspectives sought and are being requested to respond to the information collection in addition to their regular duties as administrators, directors, and managers/coordinators. 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 \$84,138.16. Costs include 436.5 personnel labor hours and other direct costs of data collection, including field work and analysis. As noted in section A2, the goal is for the findings to inform the development of ACF research. The costs for writing up findings to share with ACF are included in the "Reporting" row. However, findings may be included in a future public-facing brief summarizing the results of the overall environmental scan. Findings may also be shared publicly in service of justifying design decisions for future research activities. Estimated annualized costs to the federal government over the requested one-year approval period are as follows:

Cost Category	Estimated Costs
Data Collection	\$41,401.56
Analysis	\$21,368.30
Reporting	\$21,368.30
Total/Annual costs	\$84,138.15

A15. Reasons for changes in burden

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

A16. Timeline

Estimated Months after OMB Approval		
1	2	3
Data Collection		
	Analysis	
		Reporting

A17. Exceptions

No exceptions are necessary for this information collection.

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Attachments

Instrument 1 – Key Informant Interview Protocol