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Department of Health and Human Services, Administration for Children and Families, Office of Planning, Research, and Evaluation

Proposed Information Collection Activity; National Survey of Early Care and Education COVID-19 Follow-Up (OMB #0970-0391)

September 28, 2020

The Center for the Study of Child Care Employment (CSCCE) at the University of California, Berkeley is appreciative of the opportunity to provide comments on the request for public comment on Proposed Information Collection Activity; National Survey of Early Care and Education (NSECE) COVID-19 Follow-Up.

Since 1999, CSCCE has conducted research and proposed policy solutions aimed at improving how our nation prepares, supports, and rewards the early care and education (ECE) workforce. We routinely rely upon state and national data to inform policy recommendations that address needed changes and improvements in our early learning systems. We have long recognized that accurate and timely data is crucial in illuminating the needs, challenges and disparities within the ECE field and in advocating for change.

It is well known that ECE programs have been under-resourced and undervalued even before the pandemic. Evidence from national and state reports have shown that the pandemic has only stressed this already shaky foundation to near collapse. In our own surveys of child care center directors and family child care providers in California, conducted in April and June/July, programs reported that they are facing severe financial, administrative, and staffing challenges. We are also beginning to understand from many sources, including our own research, that the impact of COVID-19 on early childhood programs has been devastating but also varied, depending on program type, program funding source, and geography. Through our analysis of previous NSECE data, we have identified inequities across program funding types and evidence of racial wage gaps. It is really important to have national, comprehensive data on the impact of the pandemic to shed light on gaps in the system and to inform and prioritize resource allocation. We cannot agree more that the proposed collection of information is necessary and in urgent need.

As researchers with recent experience of completing two waves of our COVID-19 Impact Study in California, and as long-time advocates for the ECE workforce, we are providing the following comments to help ACF gather information that can have practical utility and policy relevance.

- In addition to documenting the supply of ECE programs that meets the needs of families, ACF should focus on capturing the reasons behind shortages in supply of

programs and immediate challenges faced by the programs. Results from our COVID-19 Impact surveys indicated that staff concerns about health and safety risks and familial duties to take care of their own children are important factors drawing them away from work. Lack of employer-sponsored health care and paid leaves further aggravates the situation. ACF should make sure that the collected data can identify the root causes of the supply shortage. This information can direct policy makers where to focus the policy and resource interventions.

- ACF should more clearly define the target population, especially for home-based providers. We know that NSECE develops sampling frames based on lists of providers collected from state agencies. But because states define home-based providers differently, including the ways in which listed and unlisted paid providers are determined and how regulated and exempt providers are differentiated, making national or state-level inference for home-based providers with the NSECE sample has been challenging.

With the growing preference for home-based care among parents during the pandemic and as families return to work, it is important to collect accurate data on the availability of these programs as well as their needs for long-term sustainability. Developing a sample based on a clearly defined target population that is comparable across states is a crucial first step to inform policies and resource allocation to better support these programs. We suggest providing definitions and allowing respondents to select the one definition that best reflects their arrangement, rather than relying on individual state categories. For example, we offer the following: 1. Family child care home: You are paid to provide child care and/or early learning services in your own home to small groups of children from two or more families. 2. Paid family friend and neighbor care: You are paid to provide child care for a relative, friend or neighbor or as a nanny or babysitter typically to one family, in the child's home or your own. 3. Unpaid family friend and neighbor care: You regularly provide child care for a relative, friend or neighbor in the child's home or your own and are not paid.

- ACF should carefully plan the timing of the two-wave data collection. We learned from our COVID-19 Impact surveys that the ECE field is changing rapidly during the pandemic and that program situations can change within months, if not weeks. We think that more than two waves of data collection may be ideal if the goal is to understand the changes in the ECE sector in response to the COVID-19 pandemic. If this is not a viable option, we recommend that survey fieldings are kept short and contained by geographic region to ensure you get accurate snapshots of the ECE supply/workforce.
- Based on our own COVID-19 surveys conducted in California, and from others who have fielded surveys this year, we recommend focusing on online data collection. While some members of the ECE workforce struggle with digital access and/or literacy (which is why there must be additional secondary outreach modes), more people are connected

online due to the pandemic and we are seeing a stronger response to surveys conducted online.

We thank you for your consideration of these comments.

Sincerely,




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