

Comments on Federal Register (Volume 86, Number 125, Friday July 2, 2021pp. 35301-35301, FR Docket 2021-14148.) Assessing the Implementation and Cost of High-Quality Early Care and Education: Field Test, OMB 0970-0499. U.S. Department of Health and Human Services; Administration for Children and Families; Office of Planning, Research, and Evaluation.
<https://www.govinfo.gov/content/pkg/FR-2021-07-02/html/2021-14148.htm>

Submitted by: Shelley H. Metzenbaum, The BETTER Project (BETTERProject.info). Former OMB Associate Director for Performance and Personnel Management. August 1, 2021

Comments

Thank you for the opportunity to comment on this upcoming information collection request. Three cheers for this effort. The intent of this proposed information collection request seems highly laudable. It is great to see HHS, ACF, and OPRE looking at, thinking about, and trying to collect information about ECE implementation practices and costs and how both relate to quality and each other. My apologies in advance for redundancies and writing errors in this submission.

My suggestions and questions fall into two categories:

- (1) suggestions to improve requests for comment on all proposed information collections; and
- (2) specific questions and comments on this specific information collection request.

I urge OMB to consider applying my first set of comments to this and all future proposed information collection requests. I also urge it to look for ways to improve communication about all information collection decisions after final decisions have been made about the information to be collected and, again, after that information has been collected and analyzed. I urge OMB and information-collecting agencies to think more carefully about how to communicate that information in ways that makes the information more useful to more people, particularly and especially practitioners and those who support them to inform focus, improve outcomes, and improve cost-effectiveness and equity. I also urge OMB and agencies to find and build evidence that supports their evidence-communicating efforts.

I. Improve information agencies provide when they request comment on proposed information collections

Let me suggest that all future requests for comment on proposed information requests include and more clearly communicate:

- intended purposes and uses of the information proposed to be collected;
- reasons why such information is expected to be helpful together with illustrations of previous uses of similar information if such illustrations exist, previous analyses using similar information and what they have found, additional questions prior research raised, and relevant theories and research on proposed measurement methodologies;
- an explanation of how this information fits into the broader scope of policy efforts, actions, and knowledge pertaining to the particular policy area and to outcome change objectives;
- if and where relevant, a sense of how each information collection effort fits into broader long-term strategy and change efforts; and
- plans for sharing collected information and analyses with key audiences to improve implementation quality and outcome impact, including discussion of expected timing of future communications, target audiences, communication channels, and communication means.

To give a better sense of what I am suggesting, let me suggest you look at the following 2 documents:

- May 17, 2021 Treasury Interim Final Rule on Coronavirus State and Local Fiscal Recovery Funds (<https://www.govinfo.gov/content/pkg/FR-2021-05-17/pdf/2021-10283.pdf>); and
- May 2020 EPA Notice of Funding Opportunity for tribes to reduce lead in drinking water (<https://www.epa.gov/newsreleases/epa-announces-43-million-tribes-reduce-lead-drinking-water-schools>).

The narrative of the former provided very helpful context for understanding the “why” and “how” of actions allowed using these federal funds. The narrative also very helpfully includes footnotes providing additional context to boost understanding of the “why” and “how.”

The second example provides a link to an outcome-focused action plan, the Federal Action Plan to Reduce Childhood Lead Exposures (<https://www.epa.gov/newsreleases/epa-announces-43-million-tribes-reduce-lead-drinking-water-schools>) that was posted together with a Notice of Funding Opportunity (NOFO). The action plan provides helpful context for the NOFO. It succinctly summarizes past progress made and possible government actions explaining why (see, for example, Figure 1.) In addition, the action plan provides a coherent description of why the outcome objective remains important and four specific outcome sub-objectives being used to advance future progress.

I realize that these two examples are not proposed information collections (IC). Nonetheless, let me suggest that they offer useful lessons that could and should be incorporated into future proposals for IC. The particular proposed IC on which I am submitting comments links to many documents providing additional information. Despite that, I found myself spending many hours on many days trying to figure out the purposes of this proposed information collection request and how each document fit within the larger picture of known and needed information. This made it hard to consider the relative import of those purposes compared to other information needs, whether or not and how the requested information is likely to advance those purposes, and if and how the proposed collection of the proposed information collection might be improved. The difficulty of navigating this and other information made it hard to comment as thoughtfully and helpfully as I would have liked on this proposed information collection request. I therefore open my comments on this specific information collection proposal with a more general comment pertaining to all future requests for comments on ICs. Let me suggest that future proposed information collection requests always get paired with:

- information that more clearly and easily explains intended and possible uses of the collected information as well as likely audiences for that information;
- information about the expected value and applicability of the information as well as the measurement methodology;
- future plans for sharing the information and its analyses with key users in the implementation system including and especially those working on the front line and those working to support them to improve implementation effectiveness, cost-effectiveness, and equity; but also
- plans for sharing collected information and its analyses with the public and key policy makers to build understanding of program purposes, accomplishments, and plans.

In other words, in the future, please include with proposed information collection requests more narrative linked to prior data analyses, evaluation findings, and descriptions of how this information will be used to inform national and sub-national program focus and to improve performance on multiple dimensions (e.g., effectiveness, cost-effectiveness, and equity) by helping to identify better practices and by helping to increase adoption of better practices and reduce use of less good or ineffective practices.

Providing this sort of context will presumably become easier as agencies start to create the “learning agendas” required by the Foundations of Evidence Act. So, too, could linking to agency, cross-agency, or program strategic plans and performance reports. Making these linkages more clear would not only provide more context for understanding and commenting on proposed information collection requests, but also aid agency decision-making about information collection priorities.

2. Specific questions and comments on this specific information collection request

My specific comments pertain to:

- a) implementation measurement;
- b) cost measurement;
- c) purposes and uses of the proposed information collection;
- d) alternate sources of useful information; and
- e) effective communication of collected data, analyses, and other relevant evidence.

(a) Implementation measurement

I was unable to find the proposed method for implementation measurement so am unable to comment on it. It may have been available at the links provided with this Federal Register notice, but I could not find it. An associate who also looked at the FR notice told me that the survey proposes to survey teaching staff using the SEQUAL survey, expanding on prior SEQUAL surveys presumably done of others to survey teachers. However, that person was unable to find the survey questions. If the Federal Register notice did link to the survey questions, they were hard for 2 people to find. If it did not, I urge you to make the survey questions more easily findable to receive more meaningful feedback.

I also hope that survey questions and findings will be made readily available in the future, and that they will not be proprietary nor hidden behind a paywall. (It is my understanding that ERIC.ed.gov is used to make all research funded by the U.S. Education Department public in its entirety. I hope HHS and ACF already or will do the same with these and previous survey findings it supported financially.) When making the data, analyses, and research findings public, it would also be good to have these data and analyses shared in a way that facilitates research by others. It was unclear to me where to find the prior findings from use of this SEQUAL instrument (or other survey instrument that will be used if it is not SEQUAL.) Nor is it clear how prior findings have been or will be used to inform focus, to find ways to improve, to increase adoption of better practices and reduce use of less good ones, to support funding requests and inform resource allocation decisions by policy makers as well as managers, or for other purposes.

Companion information apparently did indicate that "Individual teaching staff responses to the SEQUAL will be scored and aggregated to create center-level domain scores on Teaching Supports, Learning Community, Job Crafting, and Adult Well-Being." This raises another question: how will these center-level domain scores be used? I hope they will not be used to compare and rate centers nor to reward or punish but only to find centers with better and improving practices with lessons worth sharing as well as to find centers that may have problems that need and can be helped individually and collectively.

Searching online, I was able to find some information about SEQUAL, such as this site (<https://www.researchconnections.org/childcare/resources/29264>.) The information at this site may suggest the scope and intent of this data collection effort. It is unclear, however, if and how the information collection proposed in the FR fits with the larger effort described at this site. Also, I could not find an update on what has been learned to date from the previous studies discussed at this site

although the project seems to have started five years ago, in 2016. The site does contain useful information from a literature review. Practitioners in the field and those who support them might find this information useful, but it would need to be packaged and communicated in a way that makes that information easier for the field to find, use, and appropriately apply.

I was also able to find the following site discussing some prior SEQUAL findings:

<https://files.eric.ed.gov/fulltext/ED597183.pdf>. This information seems intriguing and useful for appreciating aspects of the ECE workplace that would benefit from attention. The statistics and quotations that are shared in this report about what staff do and do not have time to do are interesting, for example. This study again makes me wonder, though, if and how the findings of the earlier study(ies) referenced in the FR notice were shared. Is this one of them? It also makes me wonder about the kind of analyses that will be done with this proposed information collection, how it will build on past findings, and how and when those analyses will be shared with the field to help practitioners make more-informed decisions.

Supporting Statement Part B p. 4-5 to which this IC Fed Register notice links indicates a plan to limit the SEQUAL survey to include “only items deemed necessary to accurately measure costs and implementation.” I hope this this proposed limitation does not mean this survey will not capture the kind of rich staff feedback about time availability for important activities as well as perceptions of levels of support for that kind of work gathered in the previously cited SEQUAL survey. (Please note that my reading of this intended limitation may be wrong.)

In truth, though, because I had problems finding the implementation questions to be asked and measurement instruments to be used, I don’t know what the proposed survey will measure about implementation nor how it will use that information. Nor could I understand why it thinks these measurement instruments will be helpful. Answers to those questions may have been posted somewhere linked to the FR, but I could not find it.

Why not post the proposed implementation-focused SEQUAL (or other) survey questions and their intended uses online, as the World Management Survey (WMS) does (<https://worldmanagementsurvey.org/benchmark-your-organization/benchmark-your-school/>)? Also, note how the WMS explains the theory behind the measurements and prior research findings related to those theories, as done here – http://worldmanagementsurvey.org/wp-content/uploads/2016/01/HBR_2012.pdf and <https://hbr.org/2017/09/why-do-we-undervalue-competent-management>. I urge the federal government to share the survey questions to be used in this information collection and the data. I urge it to share this information with the field and the public in a way that facilitates benchmarking against those with similar characteristics and research to find better as well as less effective practices, especially since the federal government is paying for this information collection. The World Management Survey suggests one possibly useful approach to this sort of data sharing to support benchmarking and other research.

Another possible approach to consider for useful measurement to improve the effectiveness, cost-effectiveness, and equity of ECE implementation can take a very different form that leads to quicker and often greater impact: embed observers skilled in observation for problem-solving with the front line to look for opportunities for improvement and to work with the field to test and assess changes quickly. Several examples of this sort of implementation-improving work are described in *The Undoing Project* by Michael Lewis, a book describing the Nobel prize winning work (and friendship) of Daniel Kahneman and Amos Tversky. Chapter 9 describes how psychologists embedded with the Israeli army observed that thirsty troops often used their weapons to open soda bottles, damaging their weapons. Seeing this, a problem-solving psychologist suggested making a change to the weapons design to attach a tool that could easily be used to open bottles without damaging the efficacy of the weapon. Embedded psychologies also helped improve the way machine gun units worked together to increase the rate at which they fired and the efficacy of tank driver training. In addition, by paying attention to the content

and quantity of food waste, they were able to suggest ways to improve food quality without additional cost.

In short, it is great that ACF is trying to understand how to measure implementation in order to improve it. What is less clear is what the proposed method is and why it was chosen. It would be good to see more information about the proposed methodology shared and intended uses of collected information more understandably discussed and refined with practitioners in the field as well as with researchers.

b. Cost information

I was able to find a bit more about the kind of cost information to be collected than I could find about implementation information, but not a lot. I do have some questions about what I found. As far as I can tell, the plan is to ask staff about their retrospective perceptions of how much time they spent doing certain activities over some period of time (a year, I think.) In some cases, those questions may be asked about a fairly long period of time (e.g., a year.) Also, they may be asked long after the period started. I am concerned about the accuracy as well as the usefulness of these cost perceptions given the suggested frequency and timing of the proposed collection. I also have concerns about reliance on self-perceptions rather than observational and/or administrative data, given the very real presence of heuristic and other biases. I fear a high error rate associated with reliance on self-perceptions, especially if no tracking system is in place of the sort lawyers and consultants use for billing clients and charging legal costs. I also question whether the frequency and granularity of the proposed cost information collection will produce sufficiently actionable intelligence that helps centers control or reduce costs acting individually or collectively.

Generally speaking, to improve the usefulness of cost, implementation, and quality information, I urge you to give more attention to exploring when and how often to collect data as well as for what units of analysis. I wonder if, as measurement methods and measurement mining have improved, other means can be found to harvest more insights from more granular and more frequent data.

The proposed cost information collection method may have been used and proven useful in the past. If that is the case, please share useful analyses done in the past. This could help all centers operate in a more cost-effective manner. In addition, please discuss when this cost measurement method has worked well in the past and when it has not, as well as alternative cost collection methods considered and presumably rejected as inferior at least for some situations, explaining when and why the alternatives were inferior.

How will this cost information be organized, analyzed, and communicated to make it more useful to the field and to those trying to support them? Will it be collected, analyzed, and communicated in a way that makes it possible for those running centers to discern, for example, how enrollment and recruitment costs vary for the different locations and population that often affect those costs, such as urban and rural areas and high and low-unemployment areas, and to learn how to manage costs more wisely? Will it be collected in a way that makes it possible to identify centers that were able to reduce their per child food or transportation costs without compromising nutrition quality and transportation safety and availability, for example? Will the proposed data collection effort help discover lessons worth sharing with other centers? If you are not already planning to do so, consider testing to find ways to collect cost information by domain and, within domain, for different cost categories. Examples of cost categories might be: classroom teachers, classroom staff, meals, transportation, training, coaching, curricular package initial cost, curricular package subscription cost, analytic staff or consultant time to make sense of measurement, parent outreach time, financial management time, leadership management time. If these sorts of categories are not used when collecting cost data, I worry that the cost information collected will not generate informative, actionable insights for either policy implementers or policy makers. Also, if this

sort of cost information is not collected over time, I wonder how helpful it will be for finding ways to manage costs more wisely.

Also, please be clear about intended and possible uses as well as proscribed uses of this information. I would urge HHS, ACF, OPRE, and OHS to commit to using this cost information only to find ways to help the field find more cost-effective ways to operate and to commit to never using it for punitive purposes.

c. Purposes and uses of the information proposed for collection

As I read the documents to which the FR notice provided links, I found 2 stated purposes for this analysis. There may be others, but these are the clearest statements of purpose that I could find.

Page 4 of the Supporting Statement Part A (July 2021) linked to the FR notice describes questions the IC will help answer:

Focused on ECE centers

- Are differences in center characteristics, contexts, and conditions related to implementation and costs?
- What key center-level and classroom-level functions do center-based ECE providers pursue, and what implementation activities support each function?
- What are the costs associated with the implementation of the functions?
- How do staff members use their time in support of key functions within the center?

Focused on the purpose and relevance of measures for policy and practice

- How can implementation and cost data be aligned to produce relevant and useful evidence to inform decisions about the implementation activities and key functions likely to lead to quality improvement?

Page 11 of the Supporting Statement Part B talks about using constructed cost and implementation measures to:

- Validate the implementation measures
- Look for variations in implementation and cost measures (“The team will inspect descriptive statistics for implementation and cost measures, by key function, across all centers and by a range of center characteristics...”)
- Associations between implementation and cost measures
- Whether the relationship between implementation, cost, and/or quality varies by selected center characteristics, basing quality measurement primarily on publicly available QRIS ratings.

On a relatively minor note, the answer to the first bullet on p.4 clearly seems to be yes. Consider restating the question to be more precise, such as “How do differences affect implementation decisions and cost and what lessons, if any, can be learned from this information about practices that might affect implementation impact and costs?” Similarly, while associations between implementation and cost measures clearly exist, as stated in the p.11 bullet 3 purpose statement, I would urge greater clarity on intended uses and kinds of actionable insight to which it is hoped the collected information will contribute.

Just as and possibly more worrisome is the proposed use of this implementation and cost information with quality measures, particularly the QRIS measures mentioned. Those quality measures have not been

validated as good indicators of quality. Stanford Professor Deborah Stipek's June 2020 [study](#) of the California Quality Rating Improvement System concludes, for example:

[T]he current elements in Quality Counts California have weak and inconsistent associations with child outcomes. The problem is not necessarily with the dimensions measured but with how they are measured and with how points are allocated.

More recently, in March 2021, FutureEd at Georgetown University released a study on early childhood assessments, "[Tough Test](#)." The report concludes: "Evidence showing a positive relationship between quality ratings and child outcomes is limited." The report elaborates:

[E]arly learning assessments, which should reveal the true quality of preschool and kindergarten programs, are costly, challenging to administer, prone to misuse and often neglected altogether. As a consequence, we face a dearth of dependable information about the progress students are making—or not making—in preschool and the early elementary grades. The lack of affordable, high quality and readily scalable measures of our youngest students' academic and social and emotional development severely undermines the nation's efforts to put these children on a path to school success. It has substantially reduced the return on billions of dollars of investment in early learning at a moment when the coronavirus pandemic has delayed the start of education for many students and led to severe learning loss for many more. (Tough Test, p. 4)

The temptation will be strong to correlate the quality measures that are currently collected and readily available with the implementation and cost measures proposed to be collected. That could create significant problems in interpretation and fairness. Please, resist this temptation. Focus instead on finding useful ways to collect implementation and cost information for practices already found to work well and/or practices (such as feeding and reading to children) known to be essential and also to find more useful short-term quality measures strongly correlated with long-term outcomes.

Let me also and again suggest greater attention be given to sorting out the kinds of questions to be asked and answered using the proposed measurements, the kinds of analyses to be done, and the proposed application of those answers. For example, will the data be used to inform priorities, to find opportunities to realize scale economies, or to inform the design of measured trials to discover ways to improve? Will it be used to validate theories of change (and, if so, which ones) and to refine understanding of how different situations, including different demographic characteristics, affect the likely effectiveness of different practices, products, and providers?

I encourage you to involve the field in framing the questions and testing the usefulness of the measurements to be collected and in suggesting more useful measurement methods and data to collect to inform focus and find ways to improve. Also, engage the field early and often in figuring out the best ways to share collected information and analyses to engage practitioners in the discovery of better practices as well as in the identification of common problems needing more attention.

Finally, as suggested in section I, it would help to be able to see how collection of the proposed implementation and cost information fits with other information collection and evidence-building efforts to inform focus and boost improvements in the effectiveness, cost-effectiveness, and equity of ECE programs. This could be done by broadly communicating to target audiences (including field practitioners) information about final decisions made for this proposed information collection request in the context of a government-wide ECE action plan. It could be done by communicating this information together with plans and historic trends indicating where and why progress was made, as was done in action plan to reduce lead poisoning in children discussed above. In addition, it could be done in the

context of a learning agenda of the sort required by the Foundations of Evidence Act organized around ECE objectives rather than being organized only around agency.

d. Alternate sources of useful information

Please consider and test to look for alternate ways to generate, collect, and share more actionable information about ECE implementation, cost, and quality in order to improve ECE effectiveness, cost-effectiveness, and equity. Head Start centers, for example, already report on about 688 attributes of their programs, staff, and children served every year through the Program Information Report. In addition, every Head Start program is monitored by outside observers at least once every 3 years. All have CLASS observers at least once every five. These data are made public in some ways, but not in an easily analyzed, multi-year integrated database appropriately de-identified. Is the creation of such a database to enable more analyses to search for patterns, clusters, and relationships that suggest ways to improve ECE effectiveness, cost-effectiveness, and equity feasible? Could this be done in a way that does not discourage nor unfairly penalize programs? What kind of analytic, data visualization, and information communication support would help encourage more constructive analyses of available ECE data? What risks would be created by the creation of such a database and could such a database be managed well enough to make its creation worth doing? Or, are the risks too high?

Also, could and should information collected by monitors be adjusted to generate information more likely to help reveal opportunities for implementation and cost improvement? Will the proposed information collection be useful for thinking about the kinds of changes to the monitoring protocol that might make sense? I hope so.

Another path to consider exploring: a pilot project that invites and incentivizes voluntary sharing of data Centers already collect. ECE programs already collect lots of data they do not share that might be more useful if mined across centers for actionable insights. This would require sharing the data in ways that are safe and that are privacy and fairness-protecting. Every Head Start program, for example, collects attendance and dosage data, screening and assessment data, and expenditure data. They also produce needs assessments, goals and planning documents, and budgets. What insights could be gained if it were easier to analyze across this information, appropriately de-identified?

Before taking any of these steps, of course, it would help to start and continue to articulate more clearly and then hone the kinds of questions likely be useful if answered to inform focus, improve on multiple dimensions, and secure needed funding.

e. Effective communication of collected data, analyses, and other relevant evidence.

As noted above, I strongly urge you to think about the users and uses of the information you plan to collect and then communicate to those data suppliers and others in the field value-adding analyses done using the data. As part of that effort, I suggest you involve field practitioners, not just researchers, earlier and more often in iteratively testing and assessing the usefulness of different types of measurement and other information. Doing this well will require building understanding and trust in how the findings of data analytics and well-designed trials are used over time. It will also require finding, building, and sharing evidence about effective ways to communicate analyses and evidence with and to the field.

