

November 9, 2022

OMB Desk Officer for ACF

Office of Management and Budget, Paperwork Reduction Project

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Re: The Role of Licensing in Early Care and Education (TRLECE)

Dear OMB Desk Officer,

I am pleased to submit this comment in response to the Office of Management and Budget (OMB) for The Office of Planning, Research, and Evaluation (OPRE) The Role of Licensing in Early Care and Education (TRLECE) project. As a Ph.D. candidate at George Washington University and a graduate research assistant for the George Washington Institute of Public Policy, I focus on utilizing the lived experiences of educators to inform and enhance kindergarten through 12th grade (K12) education. From this perspective, I find that TRLECE is highly important to the nation's education because data inform the childcare and early education (CCEE) licensing system. Features of CCEE licensing systems include, but are not limited to, establishing licensing standards, practices to monitor provider compliance, pre-service, and ongoing health and safety training for CCEE providers, and training and management of licensing staff to perform roles related to monitoring and ensuring compliance. Given the high importance, I utilize my expertise to critically examine the TRLECE information collection tools so that the OPRE may enhance the quality, utility, and clarity of the information collected.

The TRLECE project collects data from childcare licensing administrators, front-line childcare licensing staff, and childcare providers utilizing three national surveys of childcare licensing administrators, front-line childcare licensing staff, and licensed childcare providers. For each survey, respondents are asked about the characteristics, experiences, responsibilities, and perceptions of the CCEE licensing system.. Childcare licensing administrators oversee critical systems that regulate CCEE settings for young children. Front-line childcare licensing staff are individuals who routinely conduct licensing inspections of childcare programs. They may have other responsibilities as well, if one of their jobs is to routinely conduct inspections. Licensed providers are defined as program owners/directors who oversee the day-to-day operations in a licensed center, as well as owners/operators of licensed family childcare (FCC) programs (including group and family child care homes). The purpose of these surveys is to fill gaps in the literature and deepen the field's understanding of CCEE licensing systems, which play a critical role in supporting positive outcomes for providers, families, and children. However, the childcare licensing administrator survey and front-line childcare licensing staff survey are intended to present internally valid descriptions of the characteristics and perceptions of childcare licensing administrators in each state/territory and front-line child care licensing staff in each state, not to promote statistical generalization to other populations. The childcare provider survey is intended to produce findings that are generalizable to the population of licensed childcare providers in the U.S.

I believe it is important that the TRLECE project utilizes high-validity instruments to ensure a more precise measurement of the various topics of interest included in the questionnaires. Consequently, I ask OMB to consider my comments included on the following page to ensure such validation. I present considerations for the OMB to consider as part of the terms of clearance for OMB approval of the TRLECE project for OPRE. I appreciate the opportunity to comment on the OMB's review and approval of TRLECE project's information collection instruments. I hope that my suggestions are useful. I look forward to seeing how the OMB will provide terms of clearance to the OPRE to develop and design data collection instruments. I am available to speak about my suggestions if needed.

Sincerely,

A handwritten signature in black ink that reads "Danielle Gilmore". The script is cursive and fluid, with the first name and last name clearly legible.

Danielle R. Gilmore
Ph.D. Candidate, Program Evaluation
Graduate Research Assistant

The Role of Licensing in Early Care and Education (TRLECE) Information Collection Commentary

Expanding demographics to increase understanding of historically underrepresented and diverse populations

The childcare, licensing administrator, provider, and front-line worker surveys include demographic information. The questionnaires currently collect data on gender, age, and race/ethnicity. Such data allows for a better understanding of subpopulations' perspectives and experiences with childcare licensing, especially from historically underrepresented groups. However, childcare, licensing administrator, provider, and front-line worker surveys do not collect data on disability status or sexual orientation. These are important identities to include to learn ways to better teach students with disabilities and LGBTQ+ students.

Suggested Disability Status Questions

Per the 2010 Affordable Care Act, Section 4302, the Secretary of the U.S. Department of Health and Human Services (HHS) established data collection standards for five demographic categories by issuing the HHS Implementation Guidance on Data Collection Standards for Race, Ethnicity, Sex, Primary Language, and Disability Status (10/31/2011). According to the guidance, "The six-item set of questions used in the American Community Survey (ACS) and other major surveys to gauge disability is the data standard for survey questions on disability. This set of six disability questions represents a minimum standard, and the questions and answer categories should not be changed. Since the establishment of these data collection standards, the six-item set of disability questions has been included in several population surveys to assess the health status of people with disabilities. These six questions should not significantly increase the survey burden for respondents.

HHS Disability Questions:

1. Are you deaf, or do you have serious difficulty hearing?

a. ____ Yes

b. ____ No

2. Are you blind, or do you have serious difficulty seeing, even when wearing glasses?

a. ____ Yes

b. ____ No

3. Because of a physical, mental, or emotional condition, do you have serious difficulty concentrating, remembering, or making decisions? (5 years old or older)

a. ____ Yes

b. ____ No

4. Do you have serious difficulty walking or climbing stairs? (5 years old or older)

a. ____ Yes

b. ____ No

5. Do you have difficulty dressing or bathing? (5 years old or older)

a. ____ Yes

b. ____ No

6. Because of a physical, mental, or emotional condition, do you have difficulty doing errands alone such as visiting a doctor's office or shopping? (15 years old or older)

a. ____ Yes

b. ____ No

Suggested Sexual Orientation Questions

Currently, there are multiple Federal surveys and one Federal study that collect data on sexual orientation, including identity, attraction, behavior, and gender identity. I have included one sexual orientation question used by The Bureau of Justice Statistics National Crime Victimization Survey (NCVS). I do not anticipate this question substantially adding to the survey time burden.

Recommended NCVS Questions:

- 1. Do you consider yourself to be...**
 - Lesbian or Gay
 - Straight, that is not lesbian or gay
 - Bisexual
 - Something else
 - Don't know
 - Refused