



The Center for Law and Social Policy

Administration for Children and Families
Office of Planning, Research, and Evaluation (OPRE)
Mary E. Switzer Building
330 C Street, S.W.
Washington, DC 20201

RE: Comments on “Proposed Information Collection Activity; Home-Based Child Care Practices and Experiences Study (New Collection)”

The Center for Law and Social Policy (CLASP) is grateful for the opportunity to comment on the recent notice of “Proposed Information Collection Activity; Home-Based Child Care Practices and Experiences Study (New Collection).” CLASP is a national, non-partisan, anti-poverty organization that has advocated for policy solutions that support the needs of people with low incomes for over 50 years. We develop practical yet visionary strategies for reducing poverty, promoting economic security, and advancing racial equity. CLASP works at the federal, state, and local levels and has deep expertise in child care and early education, postsecondary education, and job quality policies, including those that impact the early childhood education workforce.

CLASP commends the Office of Planning, Research, and Evaluation (OPRE) and the Administration for Children and Families (ACF) for looking into this important issue and making space for those who are closest to the issue to contribute to and influence the project. At CLASP, we have a developing portfolio of work on equitable data practices in early care and education and believe that much of the work we have done can be of value to the work ACF is pursuing. Based on this work and other knowledge and work from across our organization, we offer the following comments to reflect the department’s specific requests:

- 1. (a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility;**
 - a. At CLASP, we see family, friend, and neighbor (FFN) care as a critical component of the child care system—to meet the needs of families and, in many cases, match their preference with someone they have an established relationship with and know and trust. While all home-based child care providers’ voices are important in shaping ACF’s work, those who are license-exempt—commonly known as FFN care providers— have particularly unique experiences that often are left out of the conversation of how to best support providers and meet family need. Therefore, by centering them in this proposed information collection, the findings will indeed not only be of practical utility to the agency’s work but also crucial to helping ensure equity across provider types in accessing supports and resources that are tailored to their diverse needs in providing quality care for young children. In addition to information collected from home-based providers, including families and community members further serves the function of the agency given that all three groups are significantly impacted by the mission and work of the agency. Incorporating the voices of all those impacted is vital to creating the range of solutions that will work the best based on the specific needs of unique provider types and the communities they serve.

2. (b) the accuracy of the agency's estimate of the burden of the proposed collection of information;

- a. Since this study is to be done virtually, participants may be impacted by a variety of factors that affect how burdensome and time consuming the process may be; even outside of the direct engagements with the information collection process. These factors can include differing levels of knowledge on and access to technology use, varying reliability of internet access, challenges managing the interview in the home environment which is often their work environment, and other related factors. As a result, it is hard to make an accurate assumption of the actual burden. Furthermore, it may be beneficial to consider engaging with additional providers beyond the 60 outlined in the request for public comments and do more than one round of data collection to ensure a robust number of diverse experiences are recorded. If the number of respondents and rounds of data collection are increased, the total time burden for the agency will increase too.

3. The quality, utility, and clarity of the information to be collected;

- a. To ensure the quality, utility, and clarity of the information to be collected, the participants and their experiences must be centered throughout the entire process. This includes informing them of the methods and purpose of screening, creating clear and relevant interview questions, deciding what types of collections are useful or noting any additional time burden, etc. By doing this across the whole process, the participants are more likely to provide information that is of quality because they will understand the value of sharing their experience and time and the need to bring clarity and transparency about their experiences. It is also important that they understand how, and can have the opportunity to contribute to what, this information would look like in future home-based—and broader child care—research, policy creation and implementation, as well as efforts to strengthen quality improvement to better align with their needs. In addition, to ensure the quality and utility of the information to be collected, there must be intentional efforts to engage providers, families, and community members who speak a variety of languages. [FFN providers are heavily relied on by immigrant and dual language learning families](#) due to the reduced costs, flexibility of scheduling, and access to culturally and linguistically appropriate care options. Including FFN providers is crucial to capturing the full range of experiences within home-based care and supporting language access through the respondents first/preferred language will help ensure equitable access to the opportunity to share those experiences.
- b. Because of the time commitment this data collection will require and because of the value of their unique expertise through sharing their personal experience, we would encourage the agency to pay providers, families, and community members for their time in engaging in this process. Many FFN providers receive low wages or no payment at all and asking them to share their experience for free is disrespectful. Paying people for their time is a way to show that their time and knowledge are valued and recognizes the opportunity cost of taking that time away from their work, family, and other personal responsibilities.

4. and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

- a. As mentioned in response to the question about burden, participants may be impacted by a variety of factors including differing levels of knowledge on and access to technology use, varying reliability of internet access, challenges managing the interview in the home environment which is often their work environment, and other related factors that impact how burdensome and time consuming the process may be even outside of the direct engagements themselves. These burdens can be addressed and/or minimized by centering the participants and their needs throughout the process.

Practically, this can be done in a variety of ways:

- i. By ensuring participants are connected to reliable internet and providing it if they are not.
- ii. By ensuring participants have the necessary technology implements, such as a phone or computer, to participate in the interview.
- iii. By ensuring participants have clear instructions for how to access the technology needed to participate in the interviews and screenings and ample time to review the instructions and test the technology ahead of the interview.
- iv. By conducting the interview at times that are convenient for the participants which may be outside of normal business hours.
- v. By compensating participants for their time.

Additionally, we have the following general comments:

In recruiting providers, families, and community members to participate, there should be careful consideration for oversampling to ensure the selected individuals and the pool of responses accurately reflects the diversity of the child care and early education field. This diversity should reflect a range of participant characteristics such as: race/ethnicity, primary language, geography, etc. Likewise, we know that the child care and early education workforce, disproportionately made up of women of color and immigrant women, is plagued with inequities that deeply impact them. Therefore, disaggregating data, by factors such as race and gender identity, would be beneficial in identifying how these inequities may exist in the FFN space. However, it is important to ensure that responses are not identifiable to ensure the privacy of respondents. If participants are randomly recruited, there may be individuals whose first language is not English. If they are more comfortable participating in a different language, they should have access to translated materials and an interpreter to support the interview.

As mentioned above, these recommendations stem from our existing work on data equity and knowledge of the child care and early education system. It is well known that data collection, analysis, and dissemination can be powerful tools to improve systems within the child care and early education field, but these data processes were created within the same systems, institutions, and structures that have been shaped by the historic and present impacts of white supremacy and systemic racism. With this in mind, CLASP has highlighted the critical inclusion of equitable community engagement strategies in quantitative, qualitative, and mixed method approaches. This includes centering the experiences and expertise of those who are most directly impacted by—yet most often excluded from—the processes to collect and analyze data as well as the resulting policies and resources determined by those data.

Therefore, we commend you on the intentional inclusion of FFN providers and their experiences, along with those of the families and communities they serve, to support the work you do.

In our work, we have identified the following best practices for inclusive and equitable data processes that incorporate equitable community engagement frameworks through expanded data strategies that we would like to share.

- Analyze data with the intention of understanding inequities;
- When possible, disaggregate data to honor and unpack the trends and experiences of different groups; when it is not possible, consider whether there are other types of information that can be used to honor and distinguish the varied experiences across groups;
- Create space to shift power and allow those who are most directly impacted—and potentially harmed—to lead in defining the problem, designing the solutions, and during implementation;
- Involve directly impacted people/communities—particularly those who have been mislabeled as difficult to reach—not just as a source of information gathering, but also in developing data strategies including constructing survey questions, creating outreach strategies, interpreting and organizing qualitative responses, etc.
- Respectfully partner with community-based connectors and organizing entities from the communities of interest to build trust and authentic reciprocal relationships; and
- Ensure that the results of the research can be accessed by and are useful to the communities from where the research was collected as well as those who may be directly impacted by policy changes based on that research.

For a deeper discussion of these issues, CLASP recommends our 2021 paper, [Shaping Equitable Early Childhood Policy: Incorporating Inclusive Community Engagement Frameworks into Expanded Data Strategies](#), by Alycia Hardy and Alyssa Fortner. Although this paper was written broadly regarding improving data practices, the overall framework and many of the recommendations and resources included could be relevant for this proposed information collection activity.

Thank you for the consideration of these comments. We would be happy to discuss these recommendations with you or the contractors conducting this project. If you have any further questions, please contact Alycia Hardy at ahardy@clasp.org.