

## **ATTACHMENT L**

### **FEDERAL REGISTER NOTICE, COMMENTS, AND RESPONSES**

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# DEPARTMENT OF HEALTH AND HUMAN SERVICES

## Administration for Children and Families

### Proposed Information Collection Activity; Comment Request

*Title:* Study of Early Head Start-Child Care Partnerships.

*OMB No.:* New Collection.

*Description:* The Administration for Children and Families (ACF) in the Department of Health and Human Services (HHS) has awarded 275 Early Head Start expansion and Early Head Start-child care partnership grants in 50 states; Washington, DC; Puerto Rico; and the Northern Mariana Islands. These grants will allow new or existing Early Head Start programs to partner with local child care centers and family child care providers to expand high-quality early learning opportunities for infants and toddlers from low-income families.

ACF is proposing to conduct a descriptive study of the new partnership grantees to document the characteristics and features of partnerships and the activities that aim to improve professional development and quality of services and better meet the needs of families. The study will focus on the grantees that have received funds for Early Head Start-child care partnership grants.

The proposed data collection for the descriptive Study of Early Head Start-Child Care Partnerships will include two components: (1) Surveys of 311 partnership grantee and delegate agency directors and a randomly selected sample of 933 child care partners, and (2) in-depth follow-up case studies of 12 purposively selected partnerships.

The goal of this work is to collect descriptive information about partnership grantees and delegate agencies, child care partners, and services and quality improvement activities implemented as part of the partnerships and explore how particular

partnership models operate. These data will be used to describe the national landscape of partnerships, fill a knowledge gap about partnership models implemented in the field, lay the groundwork for future research, and provide information to inform technical assistance and actions aimed at informing the Early Head Start-child care partnerships grant initiative.

*Respondents:* Partnership grantee and delegate agency directors; child care partner managers/owners; partnership staff who focus on coordinating activities among partners, monitoring compliance with the Head Start Program Performance Standards, and providing technical assistance and training; frontline staff; parents; and other state and local stakeholders (such as staff from child care resource and referral agencies or child care subsidy administrators).

*Annual Burden Estimates:* The following instruments are proposed for public comment under this 60-Day Federal Register Notice.

Instrument	Total number of respondents	Annual number of respondents	Number of responses per respondent	Average burden hours per response	Annual burden hours
1. Partnership grantee and delegate agency director survey .....	311	156	1	1	156
2. Child care partner survey .....	933	467	1	0.50	234
3. Interview topic guide:					
Partnership grantee and delegate agency directors .....	12	6	1	1.5	9
Partnership staff .....	36	18	1	1	18
State and local stakeholders .....	48	24	1	1	24
4. Parent focus group guide .....	96	48	1	1.5	72
5. Child care center director focus group guide .....	96	48	1	1.5	72
6. Child care center teacher focus group guide .....	96	48	1	1.5	72
7. Family child care provider focus group guide .....	48	24	1	1.5	36
8. Partnership grantee and delegate agency director questionnaire .....	12	6	1	2	12
9. Child care partner questionnaire .....	180	90	1	0.33	30

*Estimated Total Annual Burden Hours:* 735.

In compliance with the requirements of Section 3506(c)(2)(A) of the Paperwork Reduction Act of 1995, the Administration for Children and Families is soliciting public comment on the specific aspects of the information collection described above. Copies of the proposed collection of information can be obtained and comments may be forwarded by writing to the Administration for Children and Families, Office of Planning, Research and Evaluation, 370 L'Enfant Promenade SW., Washington, DC 20447,

Attn: OPRE Reports Clearance Officer. Email address: [OPREinfocollection@acf.hhs.gov](mailto:OPREinfocollection@acf.hhs.gov). All requests should be identified by the title of the information collection.

The Department specifically requests comments on (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; (b) the accuracy of the agency's estimate of the burden of the proposed collection of information; (c) the quality, utility, and clarity of the information to be collected; 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. Consideration will be given to comments and suggestions submitted within 60 days of this publication.

**Robert Sargis,**

*Reports Clearance Officer, Administration for Children and Families.*

[FR Doc. 2015-13698 Filed 6-4-15; 8:45 am]

**BILLING CODE 4184-22-P**

4184-22

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
Administration for Children and Families

Submission for OMB Review; Comment Request

TITLE: Study of Early Head Start-Child Care Partnerships

OMB No.: New Collection

DESCRIPTION: The Administration for Children and Families (ACF) in the Department of Health and Human Services (HHS) has awarded 275 Early Head Start expansion and Early Head Start-child care partnership grants in 50 states; Washington, DC; Puerto Rico; and the Northern Mariana Islands. These grants will allow new or existing Early Head Start programs to partner with local child care centers and family child care providers to expand high-quality early learning opportunities for infants and toddlers from low-income families.

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Head Start Program Performance Standards, and providing technical assistance and training; frontline staff; parents; and other state and local stakeholders (such as staff from child care resource and referral agencies or child care subsidy administrators).

#### ANNUAL BURDEN ESTIMATES

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Partnership grantee and delegate agency directors	12	6	1	1.5	9
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7. Family child care provider focus group guide	48	24	1	1.5	36
8. Partnership grantee and delegate agency director questionnaire	12	6	1	2	12
9. Child care partner questionnaire	180	90	1	0.33	30
<b>Estimated Total Annual Burden Hours</b>					<b>735</b>

ADDITIONAL INFORMATION: Copies of the proposed collection may be obtained by writing to the Administration for Children and Families, Office of Planning, Research and Evaluation, 370 L'Enfant Promenade, SW., Washington, DC 20447, Attn: OPRE Reports Clearance Officer. All requests should be identified by the title of the information collection. E-mail address: [OPREinfocollection@acf.hhs.gov](mailto:OPREinfocollection@acf.hhs.gov).

OMB COMMENT: OMB is required to make a decision concerning the collection of information between 30 and 60 days after publication of this document in the Federal Register. Therefore, a comment is best assured of having its full effect if OMB receives it within 30 days of publication. Written comments and recommendations for the proposed information collection should be sent directly to the following:

Office of Management and Budget  
Paperwork Reduction Project  
Email: OIRA\_SUBMISSION@OMB.EOP.GOV  
Attn: Desk Officer for the Administration for Children and  
Families

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Karl Koerper  
*Reports Clearance Officer*



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July 22, 2015

ATTN: OPRE Reports Clearance Officer  
Administration for Children and Families (ACF)  
Office of Planning, Research and Evaluation  
370 L'Enfant Promenade SW  
Washington, DC 20447  
Sent via email: [OPREinfocollection@acf.hhs.gov](mailto:OPREinfocollection@acf.hhs.gov)

**Subject: Proposed Information Collection Activity: Study of Early Head Start-Child Care Partnerships**

On behalf of the American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO, and the tens of thousands of family child care providers, child care center workers, and Head Start agency employees we represent across the country, we appreciate the opportunity to provide comments on the study of the new Early Head Start-Child Care Partnerships (EHS-CCP). The study offers the chance to learn about the experiences and choices made by partnership grantees and partner organizations.

The Administration for Children and Families (ACF) seeks participation in the EHS-CCP as a means to not only improve access for low-income children and families to quality child care, but also to increase and stabilize the incomes of child care providers. Child care providers earn low wages. Nearly half of all child care workers rely on some form of public assistance.<sup>1</sup> While specific wage data for family child care providers (FCCs) is not available, we know that child care workers have not experienced an increase in real earnings since 1997, despite a nearly two-fold increase in costs to parents for early childhood services.<sup>2</sup> Not only are EHS subsidies higher than Child Care Development Fund (CCDF) subsidies, but the CCDF subsidies for FCCs are generally lower than those for child care centers.

Another motivation for FCCs to participate in the EHS-CCP is stability. In the CCDF system, providers serving a child with a subsidy often are paid retroactively, and may experience delays or inconsistent payment schedules for reasons beyond their control. Head Start operates as a grant where payments are drawn down directly, so routine payments can be established. For FCC providers, that consistency is extremely beneficial.

<sup>1</sup> Worthy Work, STILL Unlivable Wages: The Early Childhood Workforce 25 Years after the National Child Care Staffing Study by Marcy Whitebook, Deborah Phillips, and Carollee Howes. Berkeley, CA: Center for the Study of Child Care Employment, University of California, Berkeley. 2014.

<sup>2</sup> Ibid.

**American Federation of State, County and Municipal Employees, AFL-CIO**

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ACF also encouraged participation in the EHS-CCP as a means for child care providers to access materials, trainings, and professional development with the aim to improve quality.

Improving the working conditions of child care providers is a priority for AFSCME. We recommend that ACF consider adding the following questions to the *Child Care Partner Survey*, the *Family Child Care Provider Focus Group Guide*, and the *Child Care Center Director Focus Group Guide*, so the study will capture changes in income and whether income has become more stable, as well as changes in access to technical assistance and professional development.

*Partnership Grantee Director Survey and Child Care Partner Survey*

- For Partnership Grantee Directors, request the numbers of expansion and partnership slots in new grants.
- For Child Care Partners, ask whether they have reduced the numbers of children served because of EHS standards.
- For questions related to partnership agreements, add items about whether contracts include payment rates and schedules, procedures and compensation for vacancies and waiting periods, procedures for resolving disputes, and rights and obligations following termination.
- Include technology (hardware or software) as a possible use of partnership funds on checklists.
- Add questions about whether partnership agreements were focused on changing partners' income stability and provider income and if they have achieved those goals.
- Include a specific question about whether training provided for child care partner staff is focused on earning credentials or credits.
- Probe the frequency of all quality improvement activities.
- Ask about the provision of substitutes during child care partner staff training in addition to funding for release time.
- Be careful to spell out "CCDF" and acknowledge that in some states the funding stream is renamed and blended with state dollars; not all recipients may associate CCDF with their funding.
- Add options to ascertain whether enrollment priorities include homelessness or foster care.

*Family Child Care Provider Focus Group Guide and Child Care Center Director Focus Group Guide*

- Probe whether increased wages and/or stability are reasons for participation in the EHS-CCP.
- Ask if the partnership offered increased income stability for the business's income and if the incomes or benefits of teachers or providers working directly with children have increased or decreased.
- Ask whether roles and responsibilities of the grantee and partner are clear.

*Child Care Center Teacher Focus Group Guide*

- Probe whether the partnership has led staff to pursue or earn credentials or credits.



Child Care Partner Survey

- Ask whether partnerships have increased wages or stability for staff working directly with children.
- Ask whether professional development or training for staff builds toward a credential or credits in the Quality Improvement Activities section.
- For question RC7, adjust options 4 and 5 to read “I feel like a professional” and “I feel like a true professional,” rather than wording that implies only changes in providers’ behavior would lead to professional sensibility. Another option would be an open-ended question for child care partners about how their self-perception has changed due to the partnerships.

Thank you for your attention. If we can clarify any of our recommendations to increase the quality, utility, and clarity of the findings of this information collection, please contact Sookyung Oh at [soh@afscme.org](mailto:soh@afscme.org) or 202-429-1095.

Sincerely,



Steven Kreisberg  
Director of Research and  
Collective Bargaining Services

SK/dd

Robert Sargis  
Reports Clearance Officer  
Administration for Children and Families  
Office of Planning, Research and Evaluation  
370 L'Enfant Promenade SW  
Washington, DC 20447

August 4, 2015

Dear Mr. Sargis:

The Early Care and Education Consortium (ECEC) thanks you for the opportunity to submit the following comments and questions regarding the proposed Descriptive Evaluation Study of Early Head Start-Child Care Partnerships (EHS-CC Partnerships) announced in the Federal Register, Volume 80, Number 108, Page 32125.

ECEC is the nation's leading nonprofit alliance of multi-site, high-quality Community Early Care and Education Providers, State Child Care Associations, and Educational Services Providers, representing over 9,000 programs in all 50 states. Our members are committed to serving as the unified voice for providers of high-quality programs and services for all families.

ECEC Providers serve families at every level of the income spectrum?continuum. A substantial proportion of the children served by ECEC Providers are able to access high-quality care because of the support of child care subsidy dollars. And currently, several ECEC member programs take part in the EHS-CC Partnerships initiative. ECEC members work in partnership with EHS in over 12 states, including Alabama, Florida, Tennessee, Georgia, Illinois, Wisconsin, and Pennsylvania.

ECEC strongly supports the administration of a descriptive evaluation study of the EHS-CC Partnerships. This proposed protocol represents a critical opportunity to gather information on the EHS-CC Partnerships to identify both the challenges and scalable best practice in ongoing Partnership implementation and recommend changes that will improve current operational requirements and supports. This study also serves as an exciting window onto the collaboration and innovation taking place *between* partners that will ultimately improve the quality of the early experiences and services provided by the Partnerships.

ECEC appreciates that the Office of Planning, Research and Evaluation (OPRE) convened a diverse advisory panel—including representatives of the ECEC Provider community—to provide input and guidance regarding the design and content of this study. In order to strengthen the study's useability and impact, ECEC suggests the following additional changes

- ECEC supports the random selection design for the 933 child care partners sample, and requests that there be input from the Partnership community to inform HHS's selection of 12 "purposively selected partners for case study."

- In the ***Child Care Center Director's Focus Group Guide:***
  - Revise probe question #9 to reflect a direct question regarding the Head Start Program Performance Standards that are the most challenging to implement and to elicit the strategies and practices to address those challenges.
  - Add the following questions :
    - What meaningful contributions has the Child Care Director brought to the Partnership e.g. What have been your most meaningful contributions to the partnership? Please indicate what areas of program operation they impact most strongly, e.g. administration and leadership, management, and classroom instruction.
    - Are roles of the responsibilities of both the grantee and partner clearly defined in the planning process and documentation? Please give positive and negative examples that have impacted the partnership and how they have or have not been resolved.
    - Has the Partnership increased or decreased the child care partner provider's stability in meeting fixed costs of program operation?
    - Address the extent to which the Partnership has enhanced the socio-economic diversity of the children and families served by the program.
- In the ***Child Care Center Teacher Focus Group Guide:***
  - Add a question that addresses whether the Partnership has enabled staff to pursue and/or earn additional credentials or credit hours.
- In the ***Parent Focus Group Guide:***
  - Address , if applicable, how the Partnership has supported the family's participation in the child care assistance program through sustaining subsidy eligibility and supporting the family's continuity of program participation.
- In the ***Child Care Partner Survey:***
  - Expand the answer choices for PD14 to include Staff Positions and Staff Salaries and Benefits.
  - Expand the answer choices for Q16 to include :
    - items and materials that specifically meet the needs of infants and toddlers, according to research and best practice. These might include: wall mirrors with pull-up bars; baby bounce chairs; rocking chairs; mats and busy boards; foam blocks; mobiles; and washable stuffed animals.
    - Technology based learning materials and supports
  - Revise PQ2, choice "a" to read, "The grant director from (PARTNERSHIP GRANTEE) has worked with me to jointly develop a plan to facilitate implementation of the partnership."
  - Add questions that address whether:
    - Partnership agreements and contracts include payment rates and schedules, procedures for filling and paying for vacancies, and procedures for resolving disputes.
    - Participation in the Partnership has led to fewer children served by the program in order to meet the EHS Program Performance Standards for ratio's and/or group size.

- In the **Partnership Grantee Director Survey**:
  - Add a question addressing meaningful contributions to the Partnership on the part of the Child Care Director, e.g. *What have been your Child Care Director counterpart's most meaningful contributions to the partnership? Please indicate what areas of program operation they impact most strongly, e.g. administration and leadership, management, and classroom instruction.*
  - Add a question addressing whether roles and responsibilities of each of the grantee and partner are clearly defined in the planning process and documentation.
  - Add a question addressing the extent to which the Partnership has enhanced the socio-economic diversity of the children and families served by the program.
- In the **Child Care Partner Questionnaire**:
  - Expand the answer choices for #39 to include:
    - Items and materials that specifically meet the needs of infants and toddlers, according to research and best practice. These might include: wall mirrors with pull-up bars; baby bounce chairs; rocking chairs; mats and busy boards; foam blocks; mobiles; and washable stuffed animals.
    - Technology based learning materials and supports.
  - Revise #51, choice "a" to read, "The grant director from (PARTNERSHIP GRANTEE) has worked with me to jointly develop a plan to facilitate implementation of the partnership."

Careful consideration of this evaluation study's design and content is necessary to ensure it thoroughly captures essential and applicable information about the Partnerships' implementation process. Aspects of program implementation that are not measured and reported on tend to be less likely to be considered as a prime factor that may be impacting program effectiveness. ECEC looks forward to learning about additional evaluation protocols that will systematically capture information about Partnership design, implementation, and activities.

Rachel Demma, ECEC's Policy Director [rdemma@ececonsortium.org](mailto:rdemma@ececonsortium.org) is our point of contact for additional information regarding these recommendations.

Sincerely,

M.-A. Lucas  
Executive Director  
Early Care and Education Consortium



Administration for Children and Families  
Office of Planning, Research, and Evaluation  
370 L'Enfant Promenade SW  
Washington, DC 20447

Attn: OPRE Reports Clearance Officer

Subject: Proposed Information Collection Activity: Study of Early Head Start-Child Care Partnerships

To whom it may concern:

The National Association for Family Child Care (NAFCC) represents nearly 5,500 family child care providers who operate across all 50 states and the District of Columbia. NAFCC applauds the commitment to increasing investments in high-quality early learning experiences for infants, toddlers and their families, and the investment in child care providers to carry out this work, through the new Early Head Start Child Care Partnerships. The Partnerships are a tremendous opportunity and family child care is well-positioned to meeting the needs of infants, toddlers and their families.

We appreciate the opportunity to comment on the proposed study of Early Head Start-Child Care Partnerships. This study has the potential to offer valuable insights.

NAFCC offers the following ideas regarding the collection documents:

*Child Care Partner Survey*

- Ask whether they have reduced the numbers of children served because of EHS standards.
- For questions related to partnership agreements, add items about whether contracts include payment rates and schedules, procedures and compensation for vacancies and waiting periods, procedures for resolving disputes, and rights and obligations following termination.
- Include technology (hardware or software) as a possible use of partnership funds on checklists.
- Add questions about whether partnership agreements were focused on changing partners' income stability and provider income and if they have done so.
- Include a specific question about whether training provided for child care partner staff is focused on earning credentials or credits.
- Probe the frequency of all quality improvement activities.
- Ask about the provision of substitutes during child care partner staff training in addition to funding for release time.
- Be careful to spell out "CCDF" and acknowledge that in some states the funding stream is renamed and blended with state dollars; not all recipients may associate CCDF with their funding.
- The "Readiness to Change" questions are negative and do not leave room to acknowledge the strengths that providers bring to the Partnerships – many of them approached in the first place because of their commitment to quality. These questions need to be reframed.
  - The answer choice "I'm making sure I don't go back to my old ways" is inappropriate.

- For question RC7, adjust options 4 and 5 to read “I feel like a professional” rather than pejorative wording that implies only changes in providers’ behavior would lead to professional sensibility. Another option would be an open-ended question for child care partners about how their self-perception has changed due to the partnerships.
- Ask whether partnerships have increased wages or stability for staff working directly with children.
- Add examples to Q10 offer some examples, including accreditation.
- Clarify Q11: NAFCC doesn’t offer a quality rating it offers accreditation. “Quality rating” has a specific meaning in the states and specific language might help for accuracy here.
- The length of this survey may be daunting, especially in family child care settings. We are concerned that the response will be limited from the family child care community. We appreciate the inclusion of incentives to participate and recommend building in follow-up outreach and assistance with completing the survey.

#### *Child Care Partner Questionnaire*

- Make #16 two separate questions: *How many years have you been working in Head Start?* And *How many years have you worked in child care in the current position?*
- Clarify what is meant by “partnership” in #19. A prior relationship, or discussions about this funding stream long before a signed agreement, might make the current phrasing difficult to answer.
- #36 is well-crafted and addresses some of the concerns expressed above about the Survey document.
- #44 and #44a are well-crafted to address accreditation and are an example to consider for the Survey document too.
- #50 is also well-worded and a good approach for consideration in the “Readiness to Change” questions in the Survey document.

#### *Family Child Care Provider Focus Group Guide*

- Add a question about whether roles and responsibilities of the grantee and partner are clear.
- Ask if the partnership has offered increased stability of income for the business’s income and if the incomes or benefits of teachers or providers working directly with children have increased or decreased.
- Probe whether increased wages and/or stability are reasons for participation in the partnerships.
- Add a question about which aspects of the Head Start standards the provider may already be performing.
- Add a question about how the training requirements are fitting together with requirements previously in place, such as for child care licensure or other funding stream.

Thank you again for the opportunity to provide comments; if you have any questions, please contact me at [edaniels@nafcc.org](mailto:edaniels@nafcc.org).

Sincerely,



Eva Daniels  
Executive Director



NATIONAL HEAD START ASSOCIATION

July 31, 2015

Administration for Children and Families  
Office of Planning, Research, and Evaluation  
370 L'Enfant Promenade SW  
Washington, DC 20447

Attn: OPRE Reports Clearance Officer

To whom it may concern:

Thank you for providing us with the opportunity to submit our comments regarding the proposed Study of Early Head Start-Child Care Partnerships (Federal Register Volume 80, Number 108 (Friday, June 5, 2015) Page 32135). This study has the potential to offer valuable insights into the care, effort, and relationship-building that have gone into the design of newly funded Early Head Start-Child Care Partnerships.

The National Head Start Association believes that every child, regardless of circumstances at birth, has the ability to succeed in life if given the opportunity that Head Start offers to children and their families. NHSA is the national voice of more than a million children in Head Start and Early Head Start programs in the United States. Head Start and Early Head Start represent a national commitment to providing early learning opportunities for the children who are most at-risk and who have been proven to benefit most from early learning experiences – and Early Head Start-Child Care Partnerships are scaling investments in infants and toddlers for tens of thousands of families in 2015 alone.

The descriptive design of this study offers the chance to learn about the choices made by Partnership grantees and partner organizations, which is important as partnerships get underway, but we strongly urge OPRE to consider further work once partnerships are established to understand whether any particular feature common to all programs or unique to a few relates to outcomes for children, families, or providers. NHSA also encourages follow-up efforts that incorporate the Office of Head Start's newly explicit focus on data collection for continuous quality improvement based on Early Learning Outcomes and Parent, Family, and Community Engagement in order to gauge the effect of the variation and commonality across Head Start programs.

In order to increase the quality, utility, and clarity of the findings of this information collection, NHSA proposes the following additions or amendments to the collection documents:

*Partnership Grantee Director Survey and Child Care Partner Survey*

- For Partnership Grantee Directors, ask specifically about the numbers of expansion and partnership slots in new grants
- For Partnership Grantee Directors, in addition to recruitment strategies ask about priorities for selection of partners including location, language or cultural competency, values, and experience with the population served by Early Head Start
- For contracts, add additional items about whether contracts include payment rates and schedules, procedures and compensation for vacancies, and procedures for resolving disputes
- Include technology (hardware or systems) as a possible use of partnership funds on checklists
- Probe the frequency of all quality improvement activities

1651 Prince Street, Alexandria, VA 22314  
Tel: (703) 739-0875 - Fax: (703) 739-0878 - [www.nhsa.org](http://www.nhsa.org)

The National Head Start Association, an independent membership organization, advocates on behalf of the entire Head Start community and provides training and resources to Head programs nationwide.



NATIONAL HEAD START ASSOCIATION

- Ask about the provision of substitutes during child care partner staff training in addition to funding for release time
- Add options to ascertain whether enrollment priorities include homelessness or foster care
- Be careful to spell out “CCDF” and acknowledge that in some states the funding stream is renamed and blended with state dollars; not all recipients may associate the term CCDF with their funding
- Add questions to focus on whether partnership agreements were focused on changing partners’ income stability and provider income and whether they have done so
- Include a specific question about whether training provided for child care partner staff is focused on earning credentials or credits
- For question RC7 on the Child Care Partner Survey, adjust options 4 and 5 to read “I feel like a professional” rather than pejorative wording that implies only changes in providers’ behavior would lead to professional sensibility

*Family Child Care Provider Focus Group Guide and Child Care Center Director Focus Group Guide*

- Add a question about whether roles and responsibilities of the grantee and partner are clear
- Ask if the partnership has offered increased stability of income for the business’s income and if the incomes or benefits of teachers or providers working directly with children have increased or decreased

*Child Care Center Teacher Focus Group Guide*

- Probe whether the partnership has led staff to pursue or earn credentials or credits

*Parent Focus Group Guide*

- Specifically ask families about barriers they have experienced related to subsidy receipt either before or since enrolling in the partnership, as well as any efforts by the grantee or partner staff to support the process

The Study of Early Head Start-Child Care Partnerships represents an exciting opportunity to document Head Start’s legacy of collaboration, innovative practices, and high-quality comprehensive services for the children who need them most. It is our hope that you will pursue this collection with the goals of the early childhood field in mind: to improve the early environment and educational opportunities of children in poverty. Thank you again for the opportunity to provide comments; if you have any questions, you can reach me at [yvinci@nhsa.org](mailto:yvinci@nhsa.org).

Sincerely,

Executive Director  
National Head Start Association

1651 Prince Street, Alexandria, VA 22314  
Tel: (703) 739-0875 - Fax: (703) 739-0878 - [www.nhsa.org](http://www.nhsa.org)

The National Head Start Association, an independent membership organization, advocates on behalf of the entire Head Start community and provides training and resources to Head programs nationwide.



## Federal Register Notice and 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 a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on June 5, 2015, Volume 80, Number 108, page 23,135 and provided a sixty-day period for public comment. A copy of this notice is attached as Appendix L. During the notice and comment period, 6 requests for copies of the information collection instruments and 4 substantive comments were received.

Copies of the draft instruments were sent by email to each of the 6 requestors. Four provided substantive comments on the proposed information collection. Those comments included strong support for this descriptive study and primarily requested adding questions to the partnership grantee director survey, child care partner survey, and focus group guides. The requested addition of items, response options, and probes focused primarily on the following topics: descriptive information about the Early Head Start (EHS)-child care partnerships, components included in partnership agreements, quality improvement activities including professional development opportunities, and child care subsidies. The study team reviewed the comments and ensured that these topics of interest are being addressed in the proposed plan for this descriptive study and, in some cases, incorporated the suggested additions to the extent possible. For example, the study team added items to the partnership grantee director and child care partner surveys requesting the number of EHS expansion slots, partnership slots in child care centers, and partnership slots in family child care (FCC) settings to obtain more detailed information about the EHS-child care partnership grants. Additionally, the study team expanded the response options to include enhancements of teacher/staff salaries to help determine the various components contained in partnership agreements. Further, to enhance the information collected on quality improvement activities information, the study team added items and response options regarding the frequency and types of professional opportunities for child care staff including earning certifications, credentials, or licensure. Lastly, the study team included questions about child care subsidy receipt and efforts by partnership staff to support the process of applying for or using child care subsidies in the parent focus group guide.

Please note that in response to commenters' concerns, all readiness to change items (RC1-RC7) were removed from the child care partner survey. Also, all acronyms such as CCDF have been spelled out and the surveys have undergone cognitive testing to help ensure that any terms included in the surveys and questionnaires are understandable to participants.