

CLASP

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; The Role of Licensing in Early Care and Education (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; The Role of Licensing in Early Care and Education (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 for the work you are pursuing. Based on this work and other knowledge and work from across our organization, we’d offer the following considerations for the study:

1. While the distribution of surveys will be random, 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 provider characteristics such as: race/ethnicity, primary language, geography, and provider type.
2. Non-licensed providers who may fall under the categories of registered, regulated, or relative caregivers should also be included in the groups surveyed. To truly deepen and broaden the understanding of the child care and early education licensing system, it is pertinent to understand the current challenges and barriers deterring providers from acquiring licensing. However, there should be additional privacy and confidentiality considerations for these provider types, to avoid unintended harmful impacts due to their licensing status.
3. 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 licensing system. However, it is important to ensure that responses are not identifiable to ensure the privacy of respondents.
4. The methods to distribute and complete the surveys should be as accessible as possible, to ensure equity. The proposed methods of web-based and telephone surveys are useful, but additional considerations should be applied to create equitable opportunities to provide

feedback. For example, the web-based surveys should be formatted and accessible through not only computers, but smartphones, tablets, etc. Additionally, the content should be reviewed to ensure plain, non-academic text and accessible color and design are in use.

5. Further, in a random selection of the groups to be surveyed, there may be individuals whose first language is not English. If they are more comfortable taking the survey in a different language, they should have access to a translated version.
6. You may consider methods beyond surveying, such as focus groups or interviews, to gather information to gain more detailed insights from participants.

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. Directly impacted people, for this information collection activity, should include those who are on the front lines of implementing and navigating programs. This could include licensing staff, administrators, and providers at various stages of the licensing process as well as those who potentially could be licensed but are experiencing barriers to complete the necessary requirements. Those implementing and navigating, or who have potential to navigate, the system would be the most impacted by policy changes.

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. While the proposed information collection will use only surveys, many of these practices can still be applied to better center equity throughout the data process:

- Interrogate whose knowledge (i.e., evidence, lived experiences, and perspectives) is considered central to the policymaking and advocacy process, and whose knowledge can be viewed as secondary or supplemental.
- 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 brought to bear;
- Create space and shift power to allow those who are most directly impacted 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.
- Engage in authentic conversations with directly impacted community members to capture their perspectives;

- Respectfully partner with community-based connectors and organizing entities 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 and 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 are relevant for surveys specifically.

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.