

Child Care Interstate Background Check (CC-IBaCs) Environmental Scan

**Formative Data Collections for ACF Research
OMB Information Collection Request
0970 - 0356**

Supporting Statement

Part B

February 2019

Submitted By:
Office of Planning, Research and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services

4th Floor, Mary E. Switzer Building
330 C Street, SW
Washington, D.C. 20201

Project Officers:

Meryl Yoches Barofsky, Ph.D, Social Science Research Analyst
Office of Planning, Research, and Evaluation

B1. Respondent Universe and Sampling Methods

Web-based Survey

The universe of Child Care and Development Fund (CCDF) Administrators for the 56 States and Territories will be invited to complete the web-based survey. These administrators are responsible for the implementation of the background check requirements mandated by the Child Care and Development Block Grant (CCDBG) Act of 2014. CCDF Administrators will be identified from the *Administration for Children and Families (ACF) State and Territory Child Care and Development Fund Administrators Contact Information List*, which is updated monthly. It is necessary to sample the entire universe of CCDF Administrators because each state and territory has a unique structure that impacts how it can access and share criminal justice, sex offender records, and child abuse and neglect data. For example, in some states, criminal justice and sex offender records are housed in the same agency, while in others they may be housed across agencies. Critically, many states have unique laws and restrictions to sharing data for employment or other non-criminal justice purposes both within states and across state lines. In order for the Office of Child Care to provide technical assistance to all states in complying with the CCDBG Act, it is necessary to understand each states' process and context.

Semi-structured Interviews

For the semi-structured interviews, we will pursue the entire universe of state and territory agencies to participate in interviews for the project. The entire universe is necessary for the sample for the reasons outlined in the web-based survey description above. The universe of respondents for these interviews will include:

- 56 state and territory child care lead agency administrators.
- 56 representatives from state and territory criminal justice information service (CJIS) agencies. We expect that in most cases the CJIS agencies will also be responsible for the state sex offender registry (SOR). In those cases, we expect to conduct one interview to cover questions related to interstate checks of both the criminal history repository and SOR. This interview may include more than one respondent (e.g., a criminal history repository specialist and a SOR custodian specialist) based on agency preferences. In 20 states, we expect the interview to include only the SOR specialist because in the 20 National Fingerprint File (NFF) states, we will not ask the criminal history-related questions¹.
- 56 representatives of state and territory agencies that are the custodians of the child abuse and neglect (CAN) registry.
- 5 representatives of state and territory agencies that are the custodians of the SOR in states where this agency is different from the CJIS agency. Including these agencies will ensure that the universe of SOR custodians has been invited to participate.

A sample of the following respondent types will also be invited to participate in an interview:

- 5 representatives of other state agencies/systems that have implemented interstate background checks, such as for the purchase of firearms or for long-term care employees.

¹ Because the FBI national criminal history check provides the same information as an interstate criminal history check for NFF states, interstate criminal history checks are not required for these states. We minimize the data collection burden by not asking for information on implementation issues where interstate checks are not required to be implemented.

- 5 representatives of other state agencies/systems with an interest in CAN registry searches, such as education, child welfare, or foster care/adoption agencies, particularly those who are working toward implementation of criminal history checks as required in the Family First Prevention Services Act.
- 10 state-level non-governmental stakeholders (representatives of advocacy groups or industry) identified as active stakeholders by a child care lead agency administrator.

These individuals will be key informants identified by child care lead agencies on the web-based survey or by other respondents in response to the interview question “Are there any other people in your state from other programs or interested agencies that you think we should interview for this study?” By identifying the sample in this manner, we will ensure our respondents in these categories are individuals who are seen by others to be actively engaged in the study issues. We do not expect that large numbers of respondents will be identified in these categories. If more are identified than expected, we will ask selected members of our expert panel for help in identifying those that will be most useful to interview.

It is possible some respondents might suggest we interview stakeholders that have not been identified in our groups proposed for interviews. For instance, respondents could suggest we interview specific child care providers, state government attorneys working on legislation, or local police departments that process fingerprints and receive criminal histories for the program. When potential key informants are identified that are not in our proposed groups, we will consider whether the individual is likely to be able to speak to the types of information we are looking for with regard to interstate checks when deciding whether to pursue the individual for an interview. We will not pursue individual child care providers for interviews, but could pursue an interview with a state government attorney working on legislation related to child care background checks. In this case, we would use the child care lead agency interview guide, but only ask those questions relevant to legislative authority.

Four representatives from relevant national organizations will also be invited to participate in an interview:

- 2 FBI representatives with expertise in Next Generation Identification (NGI) and the National Sex Offender Registry (NSOR).
- A representative of the National Law Enforcement Telecommunications System (Nlets).
- A representative of the National Electronic Interstate Compact Enterprise (NEICE).

B2. Procedures for Collection of Information

The data collection process will begin immediately after receiving notification of final OMB clearance. Within one week, the Contractor, on behalf of the ACF Office of Child Care (OCC), will disseminate a letter to state CCDF Administrators requesting their participation in this study. (See **Appendix J—Letter from the Office of Child Care on the Web-based Survey.**) The letter will describe the study, explain that there will be a phone call interview for the second stage of data collection, and ask respondents to complete the questionnaire within two weeks. For this study, data collection will be conducted in two overlapping phases, which will use separate instruments and data collection approaches.

Web-based Survey

The OCC letter that initiates the data collection process will be followed by notification of how to access a web-based survey (**Appendix K—Web-based Survey E-mail Invitation**). For this phase of the data collection, a web-based questionnaire will be administered using the online survey software Checkbox. Checkbox allows users to develop and deploy online questionnaires for personal computers (PCs), tablets, and smart phones. A link to the online survey will be sent to all CCDF lead agency Administrators identified from the *ACF State and Territory Child Care and Development Fund Administrators Contact Information List*, which is updated monthly. It may be that the CCDF Administrator is not the best person at the lead agency to respond to the survey. If this is case, we will ask the CCDF Administrator to forward the survey link to the most appropriate person. The respondent will be able to save a partially-completed survey and come back to it later if the respondent needs to gather information from others or wants to pass the survey to a colleague for completion.

Reminder emails (**Appendix L—Web-based Survey Reminder Email**) will be sent to all initial invitation email recipients to maximize response rates. The Contractor will send an email reminder two days before the deadline for survey completion to those who have not completed the questionnaire and a second email reminder the day after the deadline. Final telephone follow-ups requesting the participation of non-respondent states will be conducted three days after the second email reminder. The final telephone follow-up (**Appendix M—Web-based Survey Completion Telephone Follow-up**) will ask the child care lead agency contact if they would prefer to complete the web survey questions as part of our in-depth interview. Responses will be monitored through the online survey platform, Checkbox, and user support questions from states will be answered via email or phone as needed.

Those who do not respond after the final telephone follow-up will be considered non-responders. For states in which follow-up efforts do not result in a completed web survey, we will pursue in-depth interviews with CJIS, CAN, and SOR representatives in the state. All information collected will be kept on secure, password-protected servers.

Semi-structured Interviews

The second phase of data collection will consist of in-depth, semi-structured telephone interviews. Recruitment for these interviews will begin immediately after a state completes their survey, and therefore, the two phases of data collection will overlap. The interviews will allow us to probe deeply into the challenges that states have encountered while attempting to implement the requirements of the CCDBG Act.

The initial contact with potential respondents will be by phone (preferred) or email, depending on the contact information available for the individual (**Appendix N—Interview Phone Script Invitation, Word Version** and **Appendix O—Interview Email Invitation, Word Version**). If they agree to be interviewed, a follow-up email will be sent confirming the date and time of the interview and including a letter from OCC and the interview guide as attachments (**Appendix P—Interview Email Confirmation, Word Version** and **Appendix Q – Letter from the Office of Child Care**). Over the course of 10 business days, interview recruiters will follow-up with each potential respondent via telephone or email before moving on to an alternate contact

(Appendix R—Interview Phone Script Follow-up, Word Version and Appendix S – Interview Email Follow-up, Word Version).

Once a respondent has agreed to an interview, the Contractor will schedule a one-hour phone interview for the child care lead agency, CJIS, CAN, and SOR custodian interviews and a 30 minute phone interview with other respondent types. The typical process will be to conduct interviews one-on-one with a single point of contact. However, the Contractor will accommodate small group interviews with up to three respondents if an organization requests them. It is likely that respondents will request a group interview only when more than one person at their agency has the knowledge needed to respond to the interview questions, which they will see in advance. We will use the same interview guide for these group interviews as used for single person interviews. Interviews will not be recorded. Interviewers will take notes during the phone interview and have time allotted in the work plan to transcribe their notes into a readable document following each interview.

B3. Methods to Maximize Response Rates and Deal with Nonresponse

Expected Response Rates

We estimate a response rate for the web-based survey and the child care lead agency interview of 85 percent of contacted respondents. We believe this population will be motivated to respond to the survey and interview request because they understand the difficulties they are experiencing in complying with CCDBG Act requirements and the consequences of non-compliance. They will want to provide input into how ACF can support them in their efforts to comply with the background check requirements.

We estimate a response rate of 75 percent for interviews with other respondent types. Our expected response rate is lower for respondents other than for the child care lead agencies because these respondents are not responsible for implementation of the child care background check requirements, although the requirements have directly impacted the operations of most of the respondent types through increased volume of background screening requests. Because we are asking the child care lead agencies to identify potential interview respondents on the web-based survey, we expect that the majority of respondents we pursue for these interviews will have been actively involved in the implementation process for child care worker background checks in their states. They will understand the issues and have an interest in providing feedback through the interview process.

For states in which follow-up efforts do not result in a completed web survey, we will pursue in-depth interviews with CJIS, CAN, and SOR representatives in the state. Initial contacts for these agencies will be obtained from the list of State CJIS Officers available on the FBI CJIS and compact council websites, the online list of *State Contacts for Child Abuse Registries*, and state SOR websites.

Dealing with Nonresponse and Maximizing Response Rates

Web-based Survey

Participation in the web-based survey is voluntary. However, a determined effort will be made to maximize the rate of response. The web-based survey was designed with particular focus on clarity of questions and response options and includes 31 closed-ended questions out of a total of 35, thereby minimizing response burden.

Following the distribution of an invitation letter from OCC and an email invitation from the Contractor to participate in the web-based survey, (see **Appendix J—Letter from the Office of Child Care on the Web-Based Survey** and **Appendix K—Web-based Survey E-mail Invitation Word Version**), respondents will have two weeks to complete the instrument. Two reminder emails will be sent to participants, one to two days before the survey due date and another one day after the survey closes (see **Appendix L—Web-based Survey Reminder Email, Word Version**). Finally, non-respondents will receive a follow-up telephone call two days following the second email reminder (**Appendix M—Web-based Survey Completion Telephone Follow-up**). Through the telephone follow-up, the option to complete the survey questions as part of the in-depth interview will be offered. Providing another mode for survey completion will increase the likelihood that a particular individual will respond, therefore maximizing the response rate.

Importantly, recruitment materials will stress that survey responses will be used for the sole purpose of gathering data to inform how ACF can better support state agencies in the implementation of interstate background checks and that responses will not be used for compliance determinations. There will be no negative consequences to responding to the survey or interview.

Semi-structured Interviews

Participation in the interviews is voluntary, but as with the survey, a determined effort will be made to maximize the rate of participation and response. The interview protocol includes a series of overarching key questions and additional probing questions focused on the challenges and successes of implementation of CCDBG Act interstate background check requirements, solutions and potential solutions to challenges, and the resources that would be most helpful to support implementation. Interview facilitators will skip questions, as appropriate, based on the responses to previous questions, thereby minimizing response burden and improving the flow of the interview.

The initial contact with potential respondents will be by phone (preferred) or email, depending on the contact information available for the individual (**Appendix N—Interview Phone Script Invitation, Word Version** and **Appendix O—Interview Email Invitation, Word Version**). If they agree to be interviewed, a follow-up email will be sent confirming the date and time of the interview and including a letter from OCC and the interview guide as attachments (**Appendix P—Interview Email Confirmation, Word Version** and **Appendix Q – Letter from the Office of Child Care**). Over the course of 10 business days, interview recruiters will follow-up with each potential respondent via telephone or email before moving on to an alternate contact (**Appendix R—Interview Phone Script Follow-up, Word Version** and **Appendix S – Interview Email Follow-up, Word Version**). The repeated outreach attempts will support maximized response rates. In order to accommodate respondents' schedules, the interview team will be flexible about the dates and times that interviews are scheduled. In addition, interview

participants will receive a copy of the interview guide prior to the interview, which will maximize the completeness of the information that they are able to provide.

When child care lead agencies do not complete a survey (or they complete a survey without identifying potential respondents), the interview team will identify potential respondents using state agency websites so that interviews with state CAN registry, SOR, and CJIS representatives are pursued in each state.

B4. Tests of Procedures or Methods to be Undertaken

The survey was pilot tested with four states. Four individuals completed the survey for the pilot test and participated in a 30-minute interview to provide feedback on the survey questions. Survey question were revised based on feedback collected during the pilot test.

During the pilot test for the survey, data on the estimated time required to complete the survey was collected. For the survey, the time to complete the instrument including time for reviewing instructions, gathering needed information and completing the instrument, ranged between 15 to 30 minutes. For the purposes of estimating burden hours, the upper limit of this range (i.e., 30 minutes) is used.

The interview protocol was also pilot tested. Pilot test interviews were conducted with representatives from three child care lead agencies, two combined state CJIS/SOR agencies, one SOR custodian, and three state CAN registry custodians. (Two pilot test states are NFF states; no CJIS interviews will be conducted in NFF states.) The Contractor has revised the content of the interview instruments based on the feedback provided during the pilot test of the interview guides.

B5. Individual(s) Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data

Name and Contact Information	Organization	Role on Project
Meryl Yoches Barofsky, Ph.D. Senior Social Science Research Analyst Email: Meryl.Barofsky@acf.hhs.gov Phone: 202-401-5541	ACF, OPRE	Contracting Officer’s Representative
Sarah Blankenship, Ph.D. SRCD/AAAS Science & Technology Policy Fellow Email: Sarah.Blankenship@acf.hhs.gov Phone: 202-565-0115	SRCD/AAAS	CC-IBaCs Co-lead
Delilah P. Barton, MBA Associate Director, Safety and Security	CNA	Project Director

Email: bartond@cna.org Phone: 703-824-2994		
Joyce McMahon, Ph.D. Email: mcmahonj@cna.org Phone: 803-293-2992	CNA	Principal Investigator
Ernest Baumann Email: baumannr@cna.org Phone: 202-577-5567	CNA	Senior Technical Advisor, Interviewer (National Organizations)
CaraLee Starnes Program Manager Email: starnesc@cna.org	CNA	Interviewer (National Organizations)
Juliana Pearson, MA Associate Research Analyst Email: pearsonj@cna.org Phone: 703-824-2447	CNA	Interviewer, data analyst
Brittany Cunningham, Ph.D. Research Scientist Email: Cunninghamb@cna.org Phone: (571) 225-5080	CNA	Interviewer
Rachel Mathieu Research Analyst Email: mathhieur@cna.org Phone: 703-824-2679	CNA	Data analyst
Mary Gabay, MS Senior Study Director Email: marygabay@westat.com Phone: 301-294-2811	Westat	Project Manager, Environmental Scan
Eileen Graf, Ph.D. Research Scientist Email: graf-eileen@norc.org Phone: (312) 978-6190	NORC at the University of Chicago	Lead Interviewer
Julie Kubelka, MS Senior Research Analyst Kubelka-Julie@norc.org	NORC at the University of Chicago	Interviewer