# THE SUPPORTING STATEMENT

The Office of Management and Budget (OMB) requires that for approval under the Paperwork Reduction Act a Supporting Statement must be prepared in the format specified below. Information in the Supporting Statement should be provided in a manner that is responsive to the OMB instructions, and each item must be identified using the numbering system given by OMB. If the Supporting Statement exceeds 10 single-spaced pages in length, there should be a summary not exceeding one page in length which precedes it.

Every effort should be made to keep the Supporting Statement to a length of 10-12 pages. When possible, detailed information should be placed in an attachment, which is then referenced in an appropriate place in the Supporting Statement so that interested reviewers can peruse it. Each attachment should be referenced in the text, so that a reviewer knows why it has been included and which portions may be of particular interest. <u>Brevity</u> and <u>clarity</u> with respect to both the text of the Supporting Statement and any attachments are highly desirable; only the information requested by the OMB outline and needed to understand the project should be included.

This annotated electronic version of the OMB outline for a Supporting Statement has been prepared by the ACF, Office of Planning, Research and Evaluation (OPRE), to assist in the preparation of a request for clearance of an information collection. This template can be downloaded from the PRA E-Office information collection web site.

## **General Instructions**

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must be entered in worksheet I. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.

### THE SUPPORTING STATEMENT

Tribal Maternal, Infant, and Early Childhood Home Visiting Program Implementation Plan Guidance and Form 1: Demographic and Service Utilization Data

### **Specific Instructions**

#### A. Justification

1. Circumstances Making the Collection of Information Necessary

Social Security Act, Title V, Section 511 (42 U.S.C. §711), as amended by the Medicare Access and Children's Health Insurance Program (CHIP) Reauthorization Act of 2015 (Public Law (Pub.L.) 114-10), created the Maternal, Infant, and Early Childhood Home Visiting Program (MIECHV) and authorized the Secretary of HHS (in Section 511(h)(2)(A)) to award grants to Indian tribes (or a consortium of Indian tribes), tribal organizations, or urban Indian organizations to conduct an early childhood home visiting program. The legislation set aside 3 percent of the total MIECHV program appropriation (authorized in Section 511(j)) for grants to tribal entities. Tribal MIECHV grants, to the greatest extent practicable, are to be consistent with the requirements of the MIECHV grants to states and jurisdictions (authorized in Section 511(c)), and include conducting a needs assessment and establishing quantifiable, measurable benchmarks.

The Administration for Children and Families, Office of Child Care and Office of the Deputy Assistant Secretary for Early Childhood Development, in collaboration with the Health Resources and Services Administration, Maternal and Child Health Bureau, plans to awarded grants for the Tribal MIECHV Program. The Tribal MIECHV grant awards support 5-year cooperative agreements to conduct community needs assessments, plan for and implement high-quality, culturally-relevant, evidence-based home visiting programs in at-risk Tribal communities, and participate in research and evaluation activities to build the knowledge base on home visiting among Native populations.

In Year 1 of the cooperative agreement, grantees must (1) conduct a comprehensive community needs and readiness assessment and (2) develop a plan to respond to

identified needs. Specifically, grantees will be required to conduct or update a needs and readiness assessment, and develop an implementation plan to respond to those needs, including a plan for performance measurement and CQI and participating in or conducting rigorous evaluation activities. Grantees are expected to submit the implementation plan by the end of Year 1 of the grant, with draft submission milestones throughout the first year. As part of the non-competing continuation application for Years 3-5 of the grant, Tribal MIECHV grantees will update their implementation plans as necessary to ensure that the plan accurately reflects activities to be completed throughout the remainder of the grant.

Following each year that Tribal MIECHV grantees implement home visiting services, they must also submit Form 1: Demographic and Service Utilization Data.

2. Purpose and Use of the Information Collection

The purpose of the information collection is to receive Tribal MIECHV Program grantees' needs and readiness assessments and plans for implementation so that they can be reviewed and approved as a condition for program implementation, data collection, and evaluation (Implementation Phase, Years 2-5). The Form 1 data are used to help ACF better understand the population receiving services from Tribal MIECHV grantees and the degree to which they are using services, as well as better understanding of the Tribal MIECHV workforce. Overall, this information collection will provide valuable information to HHS that will guide understanding of Tribal MIECHV grantees and the provision of technical assistance to Tribal MIECHV Program grantees.

- 3. Use of Improved Information Technology and Burden Reduction This information will be collected via submission to GrantSolutions and a federal data reporting system.
- 4. Efforts to Identify Duplication and Use of Similar Information The information is not available from any other source.
- 5. Impact on Small Businesses or Other Small Entities

The information being requested has been held to the absolute minimum required for the intended use.

6. Consequences of Collecting the Information Less Frequently

This is a submission that Tribal Home Visiting grantees make as a requirement of the cooperative agreement. If grantees do not submit implementation plans at the end of Year 1, with an annual update as part of their non-competing continuation applications, ACF will be unable to award non-competing continuation funds. Less frequent than annual data on demographics and service utilization would limit ACF's ability to provide technical assistance and oversight to grantees in the implementation and evaluation of their programs.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The collection of information will be conducted in accordance with 5 CFR 1320.5.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

There were no comments submitted in response to the 60-day Federal Register Notice. HHS did consult extensively with Tribal MIECHV TA providers to develop the revised guidance to identify opportunities to provide technical assistance to grantees for the purposes of supporting the development of grantee implementation plans. HHS will work closely with grantees as they develop their implementation plans and non-competing continuation applications, per the cooperative agreement mechanism.

9. Explanation of Any Payment or Gift to Respondents

No payments or gifts are provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

The information collection is not of a confidential nature, and therefore does not require assurance of confidentiality.

11. Justification for Sensitive Questions

There are no personal questions of a sensitive nature.

### 12. Estimates of Annualized Burden Hours and Costs

The following table outlines revised burdened estimates broken out by Years. Given grantees are expected to submit their Implementation Plans by the end of the first year of their cooperative agreements, the burden hours for the Implementation Plan Guidance take place in Year1and are not expected to impact Years 2 and 3. In Years 2 and 3, annual burden

estimates reflect hours related to reporting on Form 1, Demographic and Service Utilization Data. An average annual burden estimate is then provided.

Year 1 Tribal Maternal, Infant, and Early Childhood Home Visiting Implementatio n Plan Guidance	25	1	1000	25,000
Total Estimated Year 1 Burden Hours:				25,000
Year 2 Tribal MIECHV Form 1 Demographic & Service Utilization Data & Service Delivery Data	25	1	500	12,500
Total Estimated Year 2 Annual Burden Hours:				12,500
Year 3 Tribal MIECHV Form 1 Demographic & Service Utilization Data & Service Delivery Data	25	1	500	12,500
Total Estimated Year 3 Burden Hours:				12,500
Average Annual Burden Estimate				16,666

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

None

14. Annualized Cost to the Federal Government

None

15. Explanation for Program Changes or Adjustments

This is an expired information collection with significant changes. Significant changes have been made for two reasons. First, there will be new grantees submitting implementation plans with grants for either Tribal MIECHV Development and Implementation or Tribal MIECHV Implementation and Expansion grant programs. Revisions were therefore made to provide guidance for both types of grantees and reflect burden hours that are more accurate and refined. It is important to note that for both grant programs, grantees will be required to conduct or update a needs and readiness assessment, and develop an implementation plan to respond to those needs, including a plan for demographic and service utilization data, performance measurement and CQI, and participating in or conducting rigorous evaluation activities. Grantees are expected to submit the implementation plan by the end of Year 1 of the grant, with draft submission milestones throughout the first year. As part of the non-competing continuation application for Years 3-5 of the grant, Tribal MIECHV grantees will update their implementation plans as necessary to ensure that the plan accurately reflects activities to be completed throughout the remainder of the grant. In addition, significant changes were made due to lessons learned from current work with the first three cohorts of grantees, along with the technical assistance needed to support grantee planning, development and implementation of their programs. The intention is that the changes reflected in the revised guidance will provide better direction and support to new grantees. Finally, Form 1 was added to allow for the annual collection of Demographic and Service Utilization Data that help ACF better understand the population receiving services from Tribal MIECHV grantees and the degree to which they are using services, as well as better understanding of the Tribal MIECHV workforce.

16. Plans for Tabulation and Publication and Project Time Schedule

Per the FY 2016 Funding Opportunity Announcements (<u>HHS-2016-ACF-OCC-1161</u> and <u>HHS-2016-ACF-OCC-1162</u>) for the Tribal Home Visiting Program, at the time of award, ACF must provide grantees with detailed guidance for submitting both the needs assessment and implementation plan. FY 2016 grantees are expected to submit the implementation plan by the end of Year 1 of the grant, with draft submission milestones throughout the first year. As part of the non-competing continuation application for Years 3-5 of the grant, Tribal MIECHV grantees will update their implementation plans as necessary to ensure that the plan accurately reflects activities to be completed

throughout the remainder of the grant. Following each year that Tribal MIECHV grantees implement home visiting services, they must also submit Form 1: Demographic and Service Utilization Data.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

The expiration date for this collection expired before the program was reauthorized in FY 2016 and new grants could be awarded.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions.

**B.** Statistical Methods (used for collection of information employing statistical methods)

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When item 16 is checked "Yes," the following documentation should be included in the supporting statement to the extent that it applies to the methods proposed:

Not applicable. Statistical methods will not be used for data collection.

- 1. Respondent Universe and Sampling Methods
- 2. Procedures for the Collection of Information
- 3. Methods to Maximize Response Rates and Deal with Nonresponse
- 4. Test of Procedures or Methods to be Undertaken

5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data