

Tribal Maternal, Infant, and Early Childhood Home
Visiting Program

Performance Reporting Form 2

**OMB Information Collection Request
0970 – NEW**

Supporting Statement

Part A

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Submitted By:
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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, through 3 percent of the total MIECHV program appropriation (authorized in Section 511(j)) for grants to tribal entities. The implementation of the program is a collaborative endeavor between Health Resources Services Administration (HRSA) and the Administration for Children and Families (ACF). HRSA administers the State MIECHV program while ACF administers the Tribal MIECHV program. The goal of the Tribal MIECHV program is to support the development of happy, healthy, and successful American Indian and Alaska Native (AIAN) children and families through a coordinated home visiting system. 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.

Specifically, the MIECHV legislation requires State and Tribal MIECHV grantees to collect data to measure improvements for eligible families in six specified areas (referred to as "benchmark areas") that encompass the major goals for the program and are listed below:

1. Improved maternal and newborn health;
2. Prevention of child injuries, child abuse, neglect, or maltreatment, and reduction in emergency department visits;
3. Improvement in school readiness and achievement;
4. Reduction in crime or domestic violence;
5. Improvement in family economic self-sufficiency;
6. Improvement in the coordination and referrals for other community resources and supports

As part of their implementation plans, Tribal MIECHV grantees are required to propose a plan for meeting the benchmark requirements specified in the legislation and must report data annually to HHS, with improvement assessed at the end of Year 4 and Year 5 of their 5-year grants, (i.e. after 3 years of implementation and at the end of their 5-year

grant).

2. Purpose and Use of the Information Collection

The proposed Tribal MIECHV Form 2 (Appendix 1) will be used by Tribal MIECHV grantees to annually report their benchmark performance measures. As stipulated in the MIECHV legislation, the Tribal MIECHV grantees, like their State counterparts, must meet the required reporting of benchmark areas. The Tribal MIECHV Form 2 will be used by Tribal MIECHV grantees to begin collecting performance data in October 2017 (pending OMB approval) and then reporting performance data in October 2018 on an annual basis thereafter. The Tribal MIECHV Form 2 is new to the MIECHV Program information system and is somewhat similar to the currently-approved Tribal MIECHV Form 3 (OMB #0915-0357 Expiration: 07/31/17). The creation of Tribal MIECHV Form 2 is due to the added level of specificity and revised performance reporting requirements for grantees to report benchmarks data.

Specifically, ACF will use the proposed Tribal MIECHV Form 2 to:

- Track and improve the quality of benchmark measure data submitted by the Tribal MIECHV grantees;
- Improve program monitoring and oversight; and
- Ensure adequate and timely reporting of program data to relevant federal agencies and stakeholders including the Congress, and members of the public.

Tribal MIECHV Form 2 will provide a template for Tribal MIECHV grantees to report data on their progress under the six benchmark areas. Overall, this information collection will provide valuable information to HHS that will guide understanding of Tribal MIECHV grantees and the provision of technical assistance.

3. Use of Improved Information Technology and Burden Reduction

This information will be collected via submission to a web-based federal data reporting system that is currently under construction. ACF will utilize information technology by developing a data reporting system that is tailored to Tribal MIECHV grantee performance measures in order to minimize respondent burden and to collect data efficiently. Grantees will also submit their Demographic and Service Utilization Data (Form 1 OMB Control Number: 0970-0389 Expiration: 08/31/2019) and Quarterly Reporting Form 4 (OMB Control Number 0906-0016 Expiration: 03/31/2019) through this web-based data entry and 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, given the range of Tribal MIECHV grantees, some of which are small entities, serving small communities.

6. Consequences of Collecting the Information Less Frequently

Section 511 of Title V of the Social Security Act requires Tribal MIECHV grantees to collect data to measure improvements for eligible families in the six specified benchmark areas. A less frequent collection of performance measure information would be inconsistent with HHS grants policy and undermine the federal government's ability to track progress of grantees in achieving improvement and would limit the ability to provide technical assistance in a timely and targeted manner during the period defined in legislation.

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

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 January 23, 2017, Volume 82, Number 13, page 7836 and provided a sixty-day period for public comment. A copy of this notice is attached as Appendix 2. During the notice and comment period, one set of comments were received from consultants representing the Navajo Nation (See Appendix 3).

HHS also consulted extensively with Tribal MIECHV technical assistance providers to develop the revised performance measures and to identify opportunities to provide technical assistance to grantees for the purposes of supporting the development of grantee implementation plans, including a plan for meeting the benchmark requirements. In order to support the development of individual grantee performance reporting plans, the Tribal Evaluation Institute (TEI) at James Bell Associates, the technical assistance provider for performance reporting and evaluation for Tribal MIECHV, will provide technical assistance. HHS will work closely with grantees as they develop their plans, 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

Questions in surveys and other instruments on which respondents will base their reporting may be potentially sensitive for program participants. Parents or primary caregivers are asked by home visitors about topics such as substance abuse, family income or intimate partner violence in the course of assessment and delivery of care. The forms are part of program operations. All data will be reported to ACF in the aggregate.

12. Estimates of Annualized Burden Hours and Costs

The following table outlines burdened estimates broken out by year. The estimate was calculated to factor in data entry, analysis and reporting. Respondents are identified as individual grantees, with the number of respondents representing each grantee. An average annual burden estimate is then provided. This is an average. It is expected that the actual number of burden hours will vary across grantees.

ANNUAL BURDEN ESTIMATES

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Tribal Maternal, Infant, and Early Childhood Home Visiting Performance Reporting Form	20	1	500	10,000
Estimated Total Annual Burden Hours:				10,000

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

There is no additional capital or start-up cost for this activity. Grantees are expected to utilize their existing management information systems and other equipment (e.g., computers and software) to carry out this task. These costs were anticipated and built into the grantees' budgets under management information systems.

14. Annualized Cost to the Federal Government

For the proposed Tribal MIECHV Form 2 data collection instrument, we estimate the annual cost of federal work group meeting time (6-10 persons convening for one hour 2-4 times per month) and individual or small group review time outside of regular meetings to be approximately \$50,000. In addition, we anticipate 20% of one ACF staff person's time at the GS-13 FTE, to be \$30,000, including salary and benefits for an average annual cost of \$80,000. In addition, about \$400,000 in contract costs will be required annually for the operation of the system for automated reporting and analysis of data under the contract for developing and maintaining the federal Tribal MIECHV data reporting system currently under construction. On this basis, the total estimated annual cost to the Federal government is \$480,000.

15. Explanation for Program Changes or Adjustments

The Tribal MIECHV Form 2 is new to the MIECHV Program information system and is somewhat similar to the currently-approved Tribal MIECHV Form 3 (OMB #0915-0357). The creation of Tribal MIECHV Form 2 is due to the added level of specificity and revised performance reporting requirements for grantees to report benchmarks data. (Appendix 4) ACF discovered the past benchmarks reporting requirements were burdensome for grantees with multiple constructs and with significant variation across grantees and thus, proved challenging for ACF to collect and aggregate the data. In order to improve ACF's ongoing understanding of individual and collective grantee performance and assist with targeting technical assistance efforts, in 2015 ACF conducted a series of listening sessions with current and past grantees to solicit feedback regarding the previous Tribal MIECHV benchmarks requirements and establish priorities for modifying the requirements moving forward. The goal of the redesign of performance requirements was to reduce data collection, management, and reporting burden, increase standardization across grantees (where appropriate) while also incorporating opportunities for grantee flexibility to choose locally meaningful measures. The proposed Tribal MIECHV Form 2 will be used by Tribal MIECHV grantees to report on the revised benchmark performance reporting requirements.

16. Plans for Tabulation and Publication and Project Time Schedule

Per the FY 2016 Funding Opportunity Announcements ([HHS-2016-ACF-OCC-1161](#) and [HHS-2016-ACF-OCC-1162](#)) grantees are expected to submit their implementation plans by the end of Year 1 of the grant, and with draft submission milestones throughout the first year. Tribal MIECHV grantees will begin collecting performance data using the proposed MIECHV Form 2 starting October 2017 (pending OMB approval) and will begin to report performance data in October 2018 and annually thereafter.

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

There is no reason for the expiration date not to be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions.

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

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