

Supporting Statement A

Tribal Maternal, Infant, and Early Childhood Home Visiting Program Quarterly Data Collection

OMB Control No. 0970-xxxx-New

Terms of Clearance: None

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Administration for Children and Families (ACF) is requesting the Office of Management and Budget (OMB) to review and approve a quarterly data collection form for the Tribal Maternal, Infant, and Early Childhood Home Visiting Program (Tribal MIECHV).

The MIECHV program is designed to support voluntary, evidence-based home visiting services during pregnancy and to parents with young children up to kindergarten entry. Tribal entities are eligible to receive funding from the MIECHV program and have the flexibility to tailor the program to serve the specific needs of their communities.

The Bipartisan Budget Act of 2018 (Pub.L. 115-123). Section 511(h)(2)(A) of Title V of the Social Security Act requires that MIECHV grantees collect data to measure improvements for eligible families in six specified benchmark areas that encompass the major goals of the program. These areas are:

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

According to the legislation, MIECHV grants to tribes, tribal organizations, and urban Indian organizations, *to the extent practicable*, are to be consistent with the grants to

states and territories. The statute requires that Tribal MIECHV grantees establish 3- and 5-year benchmarks for demonstrating improvement.

In addition to providing data on these six benchmark areas, Tribal MIECHV grantees are required to submit annual reports that summarize the demographic, service utilization, and other administrative data related to program implementation (OMB control number 0970 -0389 expiration 8/31/2019).

In order to continuously monitor, provide grant oversight, quality improvement guidance, and technical assistance to Tribal MIECHV grantees, ACF is seeking to collect services utilization data on a quarterly basis.

2. Purpose and Use of Information Collection

ACF is seeking approval for a form that will be used to collect quarterly data from Tribal MIECHV grantees. Quarterly Data Reporting Form (Attachment 1) is made up of five categories of data – Program capacity, place-based services, family engagement, staff recruitment and retention and staff vacancies. This form will be used by Tribal MIECHV grantees that receive grants under the Tribal MIECHV program administered by ACF, to collect data in order to determine the caseload capacity grantees are achieving, where services are being delivered, the retention and attrition of enrolled families, and the retention and attrition of program staff on a quarterly basis.

The objectives for this data collection activity is to provide ACF with timely updates to service utilization and performance data variables that have the potential to change on a frequent basis. ACF will use this information to assist in grants monitoring activities and to target technical assistance resources to underperforming grantees.

3. Use of Improved Information Technology and Burden Reduction

Improved information technology will be utilized, where appropriate. Grantees will collect information from home visiting participants using their own established methods. Grantees will aggregate and report this information to ACF using the Tribal Home Visiting Reporting System (THVRS) which is an electronic reporting tool used by all Tribal MIECHV program grantees for annual performance reporting. This system will be modified to include the form that constitutes this information collection request.

4. Efforts to Identify Duplication and Use of Similar Information

The information collected through this request is not available from another source. Only Tribal MIECHV grantees can supply the requested information.

5. Impact on Small Businesses or Other Small Entities

Information will be collected from individuals by program staff but may include small impacts on small businesses, such as model developers. The information being requested has been held to the absolute minimum necessary for the intended use of the data.

6. Consequences of Collecting the Information Less Frequently

The information collected through this request will be reported on a quarterly basis. The intended use of this information is to assist ACF in monitoring and oversight activities and to target technical assistance resources more efficiently. This information is also likely to change more frequently than other measures Tribal MIECHV grantees are required to report on an annual basis. As such, quarterly reporting is required in order to for ACF to have the most accurate information possible when assessing grantee performance and making decisions about program policy and resources.

There are no legal obstacles to reduce the burden.

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

The request fully complies with the regulation.

8. Comments in Response to the Federal Register Notice/Outside Consultation

Section 8A:

A 60-day Federal Register Notice was published in the *Federal Register* (83, FR 45603, 9/10/18). There were no public comments.

Section 8B:

ACF worked collaboratively to define the requirements for this information collection request and to develop the data collection forms. A number of federal staff and Tribal MIECHV Technical Assistance providers were consulted during the development. Including the Tribal Evaluation Institute (TEI), technical assistance providers for Tribal MIECHV on performance reporting, data systems, continuous quality improvement (CQI) and rigorous evaluation.

9. Explanation of any Payment/Gift to Respondents

Respondents will not receive any payments or gifts.

10. Assurance of Confidentiality Provided to Respondents

No personally identifiable information (PII) is being collected through this information collection request. All data will be reported in aggregate by the grantee. This project does not require IRB approval.

11. Justification for Sensitive Questions

No questions of a sensitive nature will be asked of respondents.

12. Estimates of Annualized Hour and Cost Burden

12A. Estimated Annualized Burden Hours

Type of Respondent	Form Name	No. of Respondents	No. Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Tribal MIECHV Grantees	Tribal MIECHV Quarterly Reporting Form	25	4	24	2,400
Total					2,400

12B.

Estimated Annualized Burden Costs

Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
MIECHV Grantees	2,400	\$28.11	\$67,464

13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs

Other than their time, there is no cost to respondents.

14. Annualized Cost to Federal Government

Costs to the federal government fall into two categories:

- Costs of contractual support for modifying the reporting system, maintenance, data cleaning and aggregation of data
- Cost of federal staff time for project oversight and development

Type of Cost	Description of Services	Annual Cost
Tribal Home Visiting Reporting System (THVRS) Development – Contracted	Modifications, maintenance, data cleaning and aggregation of the electronic reporting system for quarterly data collection	\$75,000
Government Program Analyst (10%)	Project management and oversight, consultation, and analysis of data	\$9,990
Total Estimated Annual Cost		\$84,990

Government costs include personnel costs for federal staff involved in project and contract oversight, instrument design, and analysis which includes approximately 10% of a GS-13 Program Analyst.

15. Explanation for Program Changes or Adjustments

This is a new information collection.

16. Plans for Tabulation, Publication, and Project Time Schedule

Aggregation and descriptive statistics on quarterly service utilization data will be conducted in order to summarize the performance of grantees, as well as the program as a whole. This summary information may be made public through data briefs, fact sheets, professional presentations, and/or published manuscripts.

ACF is requesting a three-year clearance for this data collection activity.

Project Timeline

Activity	Time Schedule
Distribute data collection forms and instructions to Tribal MIECHV grantees	Immediately following OMB approval
Quarterly Report 1 Reporting (10/1-12/31)	Due by 3/1/19
Quarterly Report 2 Reporting (1/1-3/31)	Due by 5/31/19
Quarterly Report 3 Reporting (4/1-6/30)	Due by 8/30/19
Quarterly Report 4 Reporting (7/1-9/30)	Due by 11/30/19
Quarterly reporting will continue on an annual schedule throughout the OMB approved clearance timeframe	

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

The OMB number and Expiration date will be displayed on every page of every form/instrument.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.