

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

**OMB Information Collection Request**  
0970 - 0389

**Supporting Statement Part A -  
Justification**

May 2019

Submitted By:  
Office of Child Care, Tribal Maternal, Infant and Early Childhood Home Visiting Program  
Administration for Children and Families  
U.S. Department of Health and Human Services

## **SUPPORTING STATEMENT A – JUSTIFICATION**

### **Summary**

#### **1. Circumstances Making the Collection of Information Necessary**

Section 511 of the Social Security Act, created the Maternal, Infant, and Early Childhood Home Visiting Program (MIECHV) and authorized the Secretary of the Department of Health and Human Services (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 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 and include conducting a needs assessment and establishing quantifiable, measurable benchmarks.

The Administration for Children and Families (ACF), Office of Child Care, in collaboration with the Health Resources and Services Administration, Maternal and Child Health Bureau, awards grants for the Tribal MIECHV Program. The Tribal MIECHV grant awards support 5-year cooperative agreements to implement high-quality, culturally-relevant, evidence-based home visiting programs in at-risk Tribal communities.

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. In Years 2-5 when Tribal MIECHV grantees implement home visiting services, they must submit to ACF Form 1: Demographic and Service Utilization Data.

#### **2. Purpose and Use of the Information Collection**

The purpose of this information collection request is to renew and revise the existing approval under OMB No.: 0970-0389 (expires 8/31/19) to remove the Tribal Maternal, Infant, and Early Childhood Home Visiting Program Implementation Plan Guidance and only include Form 1: Demographic and Service Utilization Data.

The Implementation Plan Guidance was specifically created to assist Tribal MIECHV Development and Implementation, and Implementation and Expansion grantees who originally received awards in FY2016 to develop their implementation plans (a requirement of their grant). These grantees successfully submitted their plans in 2018 and

the guidance is no longer necessary.

The Form 1 data are used to help ACF better understand the population receiving services from Tribal MIECHV grantees, the degree to which they are using services, as well as staffing data to better understand the Tribal MIECHV workforce. This includes data such as numbers of newly enrolled and continuing participants, educational level and poverty status of participants, gender and ethnicity of staff, and number of home visits. Overall, this information collection will provide valuable information to HHS that will guide understanding of Tribal MIECHV grantees and the provision of technical assistance needed to support the Tribal MIECHV Program. There are only minor changes proposed to the previously approved Form 1. Changes are meant to provide clearer guidance and refine some definitions. The data fields have not changed.

### 3. Use of Improved Information Technology and Burden Reduction

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 quarterly, annual demographic and service utilization data and performance reporting.

### 4. Efforts to Identify Duplication and Use of Similar Information

This information is not available from any other source and is specific to the Tribal MIECHV program.

### 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

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

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 March 8, 2019, Volume 84, Number 46, page 8528, and provided a sixty-day period for public comment. During the notice and comment period, we received one set of comments from the Association of State and Tribal Home Visiting Initiatives (ASTHVI). The letter and our response to these comments can be found in Attachment A. In addition, ACF consulted outside the agency with James Bell and Associates, Tribal MIECHV’s data and evaluation TA provider.

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

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
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Tribal MIECHV Form 1	25	1	500	12,500	\$34.10	\$426,250
<b>Estimated Annual Burden Total:</b>				12,500	<b>Estimated Annual Cost Total:</b>	\$426,250

**Example of description of costs for Social and Human Services Assistants with 100 hours of burden:**

The job code is 21-1093 and wage data from May 2017 is \$17.50 per hours. Therefore to account for fringe benefits and overhead the rate is multiplied by two which is \$34.10. The estimate of annualized cost to respondents for hour burden is \$34.10 times 500 or \$17,050.

<https://www.bls.gov/oes/current/oes211093.htm>

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

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

14. Annualized Cost to the Federal Government

Costs to the federal government fall into two categories:

1. Costs of contractual support for modifying the reporting system, maintenance, data cleaning and aggregation of data.
2. 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	\$11,200

Total Estimated Annual Cost	\$86,200
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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-14 Program Analyst.

15. Explanation for Program Changes or Adjustments

The current collection includes guidance that was specifically created to assist Tribal MIECHV Development and Implementation and Implementation and Expansion grantees who originally received awards in FY2016 to develop their implementation plans (a requirement of their grant). These grantees successfully submitted their plans in 2018 and the guidance is no longer necessary. The program is therefore revising the collection to only include Tribal MIECHV Form 1, the form grantees use to submit their demographic and service utilization data. There are some changes proposed to the previously approved Form 1 to provide clearer guidance and refine some definitions. The data fields have not changed.

16. Plans for Tabulation and Publication and Project Time Schedule

Aggregation and descriptive statistics on demographic and service utilization data will be conducted in order to summarize the performance of grantees, and to provide vital demographic information for TA purposes. 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

<b>Activity</b>	<b>Time Schedule</b>
Continue to distribute data collection forms and instructions to Tribal MIECHV grantees	Immediately following OMB renewal
Current Tribal MIECHV Form 1 Reporting Period (10/1/18-9/30/19)	Due by 12/31/19
Form 1 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.