

## ATTACHMENT A

Response to 60 Day Federal Register Notice:

March 8, 2019, Volume 84, Number 46, page 8528

From: The Association of State and Tribal Home Visiting Initiatives (ASTHVI)

### SECTION A: PARTICIPANT DEMOGRAPHICS AND SERVICE UTILIZATION

#### Table 16. Priority Population Household Characteristics (Newly Enrolled)

- **Question 3: Household has a history of child abuse or neglect or has had interactions with child welfare services**

ASTHVI Recommendation:

Asking for, and receiving, honest responses for this self-report information is challenging for home visitors and families, and pushing to ascertain this information too early in the relationship between the family and the home visitor can damage that relationship and hamper the effectiveness of the home visits. Remove Question 3 from Table 16, so that it does not need to be asked of newly enrolled families; or that responses be made optional; or narrow the question to the index parent and child.

ACF Response:

Section 511 of the Social Security Act, created the Maternal, Infant, and Early Childhood Home Visiting Program (MIECHV) and Tribal MIECHV grants, to the greatest extent practicable, are to be consistent with the requirements of the MIECHV grants to states and jurisdictions. Table 16 collects data on the extent to which grantees are serving legislatively-mandated priority populations (Section 511(d)(4) of Title V of the Social Security Act). One of the nine priority populations is “eligible families that have a history of child abuse or neglect or have had interactions with child welfare services”. Collecting data on the family’s history of child maltreatment responds to the parameters set forth within the legislation and is also critical to understanding not only the individual characteristics of the primary caregiver and index child - - but the household that the caregiver and child reside in. This helps ACF and the grantees understand the possible risk factors families may be exposed to within the household in order to respond to their needs. While ACF appreciates the concern collecting this data on newly enrolled families, and the possible effect it may have on the home visitor/family relationship, we are required by the legislation to do so. In order to track progress over time, collection of data on these indicators must begin at enrollment. That said, we have recognized the challenges and have removed specific references to certain data sources from Table 16 in order to give grantees the option of selecting the appropriate data source. ACF will also provide technical assistance to grantees on the best methods for collecting this

information from families in ways that do not disrupt the home visitor/family relationship.

- **Question 6: Someone in the household has attained low student achievement or has a child with low student achievement**

ASTHVI Recommendation:

The current definition for this self-report question is whether an adult participant perceives themselves or others and their children in the household as having low student achievement. This definition is open to a wide range of interpretation, leaving grantees unsure how to operationalize this question. Home visitors have limited time with program participants, significant amounts of which are used asking the participant to run through the perceived educational attainment of every adult and child in their household. Limiting the universe of adults and children encompassed in this question, and more clearly defining “low student achievement” would help reduce the data collection burden and make the information more useful.

ACF Response:

Please see ACF’s response above regarding limiting the data to be collected on adults and children in Table 16. One of the nine legislatively-mandated priority populations for home visiting services is “eligible families that are or have children with low student achievement”. ACF appreciated the request to clearly define what is meant by low student achievement. However, we purposefully leave the priority population categories relatively vague to allow flexibility for grantees to interpret them in the most relevant ways for their populations.

## SECTION B: PROGRAM STAFF DEMOGRAPHICS

- **Table 20 Program Staff by Age and Other Staff Demographics**

ASTHVI Recommendation:

Several grantees feel that reporting on staff demographics such as age violates human resource policies, and at least one Tribal program’s HR department does not track this level of personal information. When considering the question posed in the Federal Register notice asking whether the information to be collected is necessary for program functions and has practical utility, grantees are unsure of the relevance of staff demographics. Administrators encourage ACF to remove the questions that violate human resource policies, and to consider whether the remaining staff demographic questions are useful when evaluating program performance.

ACF Response:

ACF appreciates the concern of asking certain questions in Section B regarding staff demographics, such as age. We stress that we do not use the ages of staff to assess grantee performance; rather, we are interested in the age ranges of staff as a way to understand the demographics of the home visiting field as a whole, in order to support continued professional development and support capacity. In addition, all the data in Form 1 is aggregated and the identities of those being reported on, whether an individual, index child, household, or staff person, is not collected.

## REDUCTIONS IN BURDEN

ASTHVI Recommendation:

Provide additional flexibility on what grantees report to reduce the level of burden and allow grantees to tailor the reporting to their area and the model(s) they implement.

ACF Response:

ACF understands that in addition to the reporting requirements associated with the MIECHV program, there is an additional data collection burden that home visiting models(s) require and this varies from model to model. Because ACF must collect and report Form 1 data for the entire Tribal MIECHV program, as mandated by the legislation, we must report on all legislatively mandated data and be able to standardize and aggregate this data as much as possible. Given the multiple home visiting models grantees are using, we cannot customize nor have grantees select the types of data they wish to collect. That said, in order to better streamline and reduce burden, ACF now has its own data reporting system that has been customized to allow grantees to import their Form 1 data. Anecdotally, we have been told by grantees this has helped reduce the time associated with reporting this data.