Tribal Maternal, Infant, and Early Childhood Home Visiting Program Guidance for Submitting an Annual Report to the Secretary

OMB Information Collection Request 0970-0409

Supporting Statement Part A - Justification

August 2021

1. Circumstances Making the Collection of Information Necessary

Title V Section 511(e)(8)(A) of the Social Security Act, requires grantees under the Maternal, Infant, and Early Childhood Home Visiting (MIECHV) program for states and jurisdictions submit an annual report to the Secretary of Health and Human Services regarding the program and activities carried out under the program, including such data and information as the Secretary shall require. Section 511 further states that the requirements for the MIECHV grants to tribes, tribal organizations, and urban Indian organizations are to be consistent, to the greatest extent practicable, with the requirements for grantees under the MIECHV program for states and jurisdictions.

The Administration for Children and Families, Office of Child Care, in collaboration with the Health Resources and Services Administration, Maternal and Child Health Bureau, has awarded grants for the Tribal Maternal, Infant, and Early Childhood Home Visiting Program (Tribal Home Visiting) since 2010. The Tribal Home Visiting discretionary grants support 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; establish, measure, and report on progress toward meeting performance measures in six legislatively-mandated benchmark areas; and participate in rigorous evaluation activities to build the knowledge base on home visiting among Native populations.

Tribal Home Visiting grantees have been notified that in every year of their grant, after the first year, they must comply with the requirement for submitting an Annual Report to the Secretary and during the final year of their grants, a Final Report to the Secretary that should feature activities carried out under the program during the past reporting period. In order to assist grantees with meeting the requirements, ACF created guidance for grantees to use when writing their annual and final reports. The guidance has and will continue to provide sections where grantees must address the following:

- Update on Home Visiting Program Goals and Objectives
- Update on the Implementation of Home Visiting Program in Targeted Community(ies)
- Progress toward Meeting Legislatively Mandated Benchmark Requirements
- Update on Rigorous Evaluation Activities
- Home Visiting Program Continuous Quality Improvement (CQI) Efforts
- Administration of Home Visiting Program
- Technical Assistance Needs

The current request updates the guidance to remove guidance about the final report, as that guidance is undergoing further updates and will be submitted separately for review and approval.

2. Purpose and Use of the Information Collection

The purpose of the guidance is to provide instructions for grantees to submit an annual report on the progress of their program to the Secretary. These reports have provided valuable information to HHS and have been used for a number of different purposes including guiding the provision of training and technical assistance to Tribal Home Visiting program grantees, a report to Congress on the status of the program, dissemination activities that highlight the successes and lessons learned of the program, as well as information that assists ACF in developing future policy, program, and collaboration efforts with tribal communities. A future request will update this information collection to include guidance to grantees related to the required final report to the Secretary.

3. Use of Improved Information Technology and Burden Reduction

Reports shall be submitted via GrantSolutions.gov per instructions provided to each grantee by the Federal Project Officer.

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 and should not have any impact on small businesses or small entities.

6. Consequences of Collecting the Information Less Frequently

This is an annual submission that Tribal Home Visiting grantees must submit after the first year of their grants. Collecting information less frequently would make it difficult to assess grantee progress throughout the life of the grant, and would make it more difficult to effectively target and provide technical assistance to grantees. The guidance provides valuable information to grantees to meet the requirement to provide an annual report that summarizes the progress grantees made on meeting all the goals and objectives set forth at the beginning of their grants. Grantees are also required to submit a final report. Guidance for the final report is currently being revised and will be submitted for review and approval when finalized. The final report is also a reporting requirement for grantees and the guidance will help grantees meet this requirement.

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 June 15, 2021 Volume 86, Number 113, page 31719, and provided a sixty-day period for public comment. During the notice and comment period, we received no comments from the public.

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 estimated time per response is based on experience since requiring the reports from grantees. The time includes the number of hours is takes a respondent to gather and then report information on the topics listed.

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
Tribal MIECHV Annual Report to the Secretary	23	1	25	575	\$36.76	\$21,137

To calculate the estimated annual cost to respondents, we used 2020 wage data from the Bureau of Labor Statistics for job code 21-1093 (Social and Human Service Assistants), which is \$18.38 per hour. To account for fringe benefits and overhead, the rate is multiplied by two which is \$36.76.

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

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

There are no additional costs to respondents.

14. Annualized Cost to the Federal Government

Costs to the federal government fall into one category:

1. Cost of federal staff time for project oversight and development.

Type of Cost	Description of Services	Annual Cost
Government Program Analyst (10%)	Project management and oversight, and consultation.	\$14,295
Total Estimated Annual Cost		\$14,295

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 Federal Project Officer.

15. Explanation for Program Changes or Adjustments

There are only minor changes to the Tribal MIECHV Guidance for Submitting an Annual Report to the Secretary. The Guidance for Submitting a Final Report to the Secretary has been removed, and will be submitted for approval as a separate instrument. For that reason, the estimated time per response has reduced to only be specific to the annual reports.

16. Plans for Tabulation and Publication and Project Time Schedule

Tribal Home Visiting grantees were notified that after the first year of their grant, they must comply with the requirement for submission of an Annual Report to the Secretary regarding the program and activities carried out under the program. This report shall be submitted to HHS by Tribal Annual Report grantees as instructed by ACF at the end of each operating year of the grant ("annual report"), or in the final year of the grant ("final report"). Grantees will continue to submit their reports annually. ACF has no plans to publish the report to the Secretary. However, some aggregate information may be published.

Project Timeline

Activity	Time Schedule
Continue to distribute guidance to Tribal MIECHV grantees	Ongoing
Current Tribal MIECHV Annual Report to the Secretary	Due by 12/31/21
Tribal MIECHV Grantee Annual Reports to th	e Secretary will continue on an annual

Tribal MIECHV Grantee Annual Reports to the Secretary 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.