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

February 2022

Submitted By:

Office of Child Care

Administration for Children and Families

U.S. Department of Health and Human Services

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. In Years 2-5 when Tribal MIECHV grantees are implementing home visiting services, they must submit to ACF Form 1: Demographic and Service Utilization Data to satisfy the legislative requirements of the program. Overall, this information collection provides valuable information to HHS that will guide understanding of Tribal MIECHV grantees and the provision of technical assistance (TA) needed to support the Tribal MIECHV Program.

This request is for an extension with minor changes. Changes include adding a virtual home visit field and revising certain terms and definitions to make reporting on the areas more concise and easier for grantees to report.

1. **Purpose and Use of the Information Collection**

The Tribal MIECHV Program 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, education level of staff and number of home visits.

ACF uses the information collected to provide appropriate technical assistance to support the Tribal MIECHV Program. Certain aggregated data is also used for various publications such as data infographics, fact sheets, professional presentations to highlight the progress of grantees. Data from Form 1 is also used for policy decisions by ACF.

1. **Use of Improved Information Technology and Burden Reduction**

Grantees will continue to 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.

1. **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 per the legislation.

1. **Impact on Small Businesses or Other Small Entities**

The information being requested has been held to the absolute minimum required for the intended use.

1. **Consequences of Collecting the Information Less Frequently**

Annual reporting of this information is required by legislation. Additionally, 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.

1. **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.

1. **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 November 22, 2021, Volume 86, Number 222, page 66314-66315, and provided a sixty-day period for public comment. During the notice and comment period, we did not receive comments.

1. **Explanation of Any Payment or Gift to Respondents**

No payments or gifts are provided to respondents.

1. **Assurance of Confidentiality Provided to Respondents**

The information collection is not of a confidential nature, and therefore does not require assurance of confidentiality.

1. **Justification for Sensitive Questions**

There are no questions of a sensitive nature.

1. **Estimates of Annualized Burden Hours and Costs**

Tribal MIECHV Program funding recipients complete this form. There are currently 23 grantees. Based on previous years of data collection, we estimate 500 hours per annual response.

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| --- | --- | --- | --- | --- | --- | --- |
| 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 Form 1 | 23 | 1 | 500 | 11,500 | $36.76 | $422,740 |

To calculate cost, we used wage data for Social and Human Services Assistants (job code 21-1093) from 2020, which is $18.38 per hours. To account for fringe benefits and overhead the rate is multiplied by two which is $36.76.

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

There are no other costs to respondents.

1. **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 | $78,000 |
| Government Program Analyst (10%) | Project management and oversight, consultation, and analysis of data | $15,000  |
| Total Estimated Annual Cost | $93,000 |

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.

1. **Explanation for Program Changes or Adjustments**

Changes from the previous Form 1 are minor, including adding a virtual home visit field and revising certain terms and definitions to make reporting on the areas more concise and easier for grantees to report. There are no changes to the estimated response time, but the number of respondents has been reduced to reflect the current number of grantees.

1. **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.

Project Timeline

|  |  |
| --- | --- |
| **Activity** | **Time Schedule** |
| Continue to distribute data collection forms and instructions to Tribal MIECHV grantees | Immediately following OMB renewal |
| Current Tribal MIECHV Form 1 Reporting Period (10/1/21-9/30/22)  | Due by 12/31/22 |
| Form 1 reporting will continue on an annual schedule throughout the OMB approved clearance timeframe.  |

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

The OMB number and Expiration date will be displayed on the form.

1. **Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification.