

Response to 30 Day Federal Register Notice:

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

Dated March 4, 2022

ACF Response:

We appreciate the comments from ASTHVI acknowledging the collaborative approach the Tribal MIECHV program prioritizes when soliciting feedback from the field. ACF understands and is grateful for the context provided by ASTHVI related to the overall administrative burden needed to collect the demographic and service utilization data associated with Tribal MIECHV Form 1. Because ACF must collect and report Form 1 data for the Tribal MIECHV program, (as mandated by the legislation) we continue to maximize the utility of collecting this data in a number of ways that not only benefit ACF but also the grantees. Below is a listing of the key points from the ASTHVI commentary to the Federal Register with our responses:

Reducing Administrative Reporting Burden:

- In order to reduce burden when reporting data, ACF continues to try and make the reporting process as easy and streamlined as possible. A few years ago, ACF developed its own data reporting system that has been customized to allow grantees to import their Form 1 data. We have been told by grantees this has helped reduce the time associated with reporting this data and has condensed the burden for reporting into the system. As was referenced in the letter from ASTHVI, revisions to Form 1 include a field for reporting virtual home visits, as well as refining and clarifying certain terms and definitions. We made these revisions based on feedback we have received from grantees as well as in consultation with our TA providers. The intention is these revisions will help clarify and therefore reduce the reporting burden for grantees.

Time Required by Home Visitors to Collect Data When Conducting Home Visits:

- ACF is sensitive to and understands the impact collecting data by home visitors when conducting a home visit (whether in-person and virtual) has when interacting with families. This issue is one that effects the entire home visiting field and continues to be an area that needs attention. Support of the home visiting workforce is a high priority for ACF, including the burden data collection requirements have on home visitors. ACF has provided webinars targeting the home visitor workforce and is committed to elevating the field through supports to home visitors. This commitment is a balance between the needs of grantees, the intention of the MIECHV legislation and future policy considerations that benefit the Tribal MIECHV program and the home visiting field as a whole. ACF recently hosted a webinar dedicated to the Tribal early childhood workforce and has conducted workshops and trainings associated with using screening and assessments for home visitors and workshops for supervisors on supporting home visitor self-care and other staff supports to address workforce burnout and turnover. Collecting data on Form 1 such as the number of home visits, demographic data of families served and demographic data on home visiting staff is vital information in Form 1 ACF uses to

understand the needs of the home visitor workforce and is critical to understanding the needs of families. All of this is done while striking a balance that includes the obligation ACF has in fulfilling the intention of the MIECHV legislation. We will continue to use the information collected in Form 1 and through additional grantee collaborations to understand the impact the program has on families, as well as the impacts on the administrative functions of the program including home visitor staff to make improvements on how ACF supports grantees.

Addressing the Financial Cost Needed for TMIECHV Data Collection, Analysis and Reporting:

- ACF continues to develop ways to provide better guidance to grantees when making budgeting decisions for their Tribal Home Visiting programs, including costs associated with data collection and reporting. ACF delivers technical assistance and resources for grantees when making these decisions. In addition, ACF Federal Project Officers work closely with grantees and provide guidance on budgeting decisions throughout the lifecycle of their grants. In addition, this past year Tribal MIECHV grantees received supplemental funding as part of the American Recovery Plan Act (ARPA) and many grantees opted to invest these additional funds towards data reporting, both through hiring additional staff and in data reporting technology. ACF will continue to support grantees in the areas of data reporting investments.