

Tribal Maternal, Infant, and Early Childhood
Home Visiting Program
Form 2: Grantee Performance Measures

OMB Information Collection Request

0970-0500

**Supporting Statement Part A -
Justification**

October 2022

Submitted By:
Office of Early Childhood Development
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.

The Administration for Children and Families (ACF), Office of Early Childhood Development (ECD), in collaboration with the Health Resources and Services Administration (HRSA), 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.

Tribal MIECHV grants, to the greatest extent practicable, are to be consistent with the requirements of the MIECHV grants to states and jurisdictions (authorized in Section 511(c)), and include conducting a needs assessment and establishing quantifiable, measurable benchmarks.

Specifically, the MIECHV legislation requires State and Tribal MIECHV grantees to collect data to measure improvements for eligible families in six specified areas (referred to as "benchmark areas") that encompass the major goals for the program and are listed below:

1. Improved maternal and newborn health
2. Prevention of child injuries, child abuse, neglect, or maltreatment, and reduction in emergency department visits
3. Improvement in school readiness and achievement
4. Reduction in crime or domestic violence
5. Improvement in family economic self-sufficiency
6. Improvement in the coordination and referrals for other community resources and supports

As part of their implementation plans, Tribal MIECHV grantees are required to propose a plan for meeting the benchmark requirements specified in the legislation and must report performance data to HHS, with improvement assessed at the end of Year 4 and Year 5 of their 5-year grants. (With the American Rescue Plan Act, 19 of the 23 grantees received an additional year of funding and will report a "Year 6" of performance data). The Tribal Home Visiting (HV) Form 2 provides a template for Tribal MIECHV grantees to report data on their progress in improving performance under the six benchmark areas, as stipulated in the legislation.

This request is for an extension with no changes to the Tribal MIECHV Form 2.

2. Purpose and Use of the Information Collection

The purpose of this information collected through the Tribal MIECHV Form 2 is to:

- Track and improve the quality of benchmark measures data submitted by the Tribal grantees;
- Improve program monitoring and oversight;
- Improve rigorous data analyses that help to assess the effectiveness of the programs and enable ACF to better monitor projects; and
- Ensure adequate and timely reporting of program data to relevant federal agencies and stakeholders including Congress and members of the public.

3. Use of Improved Information Technology and Burden Reduction

Grantees collect information from home visiting participants using their own established methods. Grantees then aggregate and report this information using Form 2 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

There are no small businesses responding to this data request. Some organizations may be considered small entities (i.e. non-profit organizations), in this case the information being requested has been held to the absolute minimum required by the legislation for its intended use.

6. Consequences of Collecting the Information Less Frequently

Section 511 of Title V of the Social Security Act requires Tribal MIECHV grantees to collect data to measure improvements for eligible families in the six specified benchmark areas on an annual basis. A less frequent collection of performance measure information would be inconsistent with HHS grants policy and undermine the federal government's ability to track progress of grantees in achieving improvement and would limit the ability to provide technical assistance in a timely and targeted manner during the period defined in legislation.

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 July 21, 2022, Volume 87, Number 139, page 43529, and provided a sixty-day period for public comment. During the notice ACF received one comment from the Association for State and Tribal Home Visiting Initiatives. The comment and ACF’s response can be found in Attachment B.

Consultation

Grantees are currently in their final year of the grants and ACF plans to review reporting processes and associated burden for future funding recipients. Grantee feedback will be solicited, as appropriate, to inform revisions to information collection requests for future Tribal MIECHV funding recipients. If changes are identified, a revision request will be submitted to OMB and will include the standard time for public comments.

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
Tribal MIECHV Form 2	23	1	500	11,500	\$38.90	\$447,350

The number of respondents is based on the current number of Tribal MIECHV grantees. The average burden estimate is based on experience to date and has not changed since the prior approval. Grantees are currently in their final year of the grants and ACF plans to review reporting processes and associated burden for future funding recipients. Grantee feedback will be solicited, as appropriate.

To calculate cost, we used wage data for Social and Human Services Assistants (job code 21-1093) from 2021, which is \$19.45 per hours. To account for fringe benefits and overhead the rate is multiplied by two which is \$38.90. <https://www.bls.gov/oes/current/oes211093.htm>

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

There are no other costs 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) Contracted	Modifications, maintenance, data cleaning and aggregation of the electronic reporting system.	\$78,000
Government Program Analyst (10%)	Project management and oversight, and consultation.	\$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.

15. Explanation for Program Changes or Adjustments

There are no changes proposed to the current form.

16. Plans for Tabulation and Publication and Project Time Schedule

Aggregation and descriptive statistics on performance data will be conducted to summarize the performance of grantees, and to provide vital 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 extension for this data collection activity.

Project Timeline

Activity	Time Schedule
Continue to distribute data collection forms and instructions to Tribal MIECHV grantees	Ongoing
Current Tribal MIECHV Form 2 Reporting Period (10/1/21-9/30/22)	Due by 12/31/22
Form 2 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.