

Attachment B

**ACF Response to Public Comments on the Tribal Maternal, Infant, and Early
Childhood Home Visiting Program: Form 2 Grantee Performance Measures
(OMB #0970-0500)**

The Association for State and Tribal Home Visiting Initiative (ASTHVI) Tribal Committee provided comments during the 60-day comment period (87 FR 43529) for the request to extend approval of Tribal Maternal, Infant, and Early Childhood Home Visiting Program: Form 2 Grantee Performance Measures (OMB #0970-0500). After reviewing the comments, ACF has provided the following responses.

ASTHVI Comment	ACF Response
<p>Tribal MIECHV grants are much smaller than the grants that are awarded to states, and the administrative burden of meeting Tribal MIECHV requirements is proportionally greater. Most Tribes have proportionally fewer staff to assist with reporting associated with MIECHV grants.</p>	<p>ACF is sensitive to the administrative burden of meeting the Tribal Maternal, Infant, and Early Childhood Home Visiting (Tribal MIECHV) reporting requirements, including reporting on performance data associated with Form 2. In anticipation of the MIECHV program being reauthorized, ACF is reviewing all reporting requirements, including Form 2, to see if there are opportunities to reduce burden and eliminate redundancies. Because 23 of the current Tribal MIECHV grant recipients are in their final year of the grants, ACF elected to renew Form 2 as-is, to not cause any disruptions in the reporting process for these grant recipients. We appreciate this feedback and will factor it in regarding any future policy decisions, pending reauthorization. ACF plans to review current requirements and will engage grant recipients to inform potential updates to reporting for future funding recipients.</p> <p>It is also important to remember that current MIECHV legislation (Section 511 of the Social Security Act) requires that State and Tribal MIECHV awardees collect performance data to measure improvements for eligible families in six specified areas (referred to as "benchmark areas") that encompass the major goals for the program. Stipulated in the legislation, the Tribal MIECHV recipients, like their state counterparts, must meet the required reporting of benchmark areas. Tribal MIECHV awardees are required to propose a plan for meeting the benchmark requirements specified in the legislation and must report on improvement on constructs under each benchmark area.</p>
<p>When asked if the new proposed annual burden of 500 hours for each respondent was an accurate reflection of the work required for Form 2 reporting, most</p>	<p>ACF appreciates the opportunity to provide additional information on how it calculates the average burden hours. Per OMB guidance, ACF estimates the time it takes for a respondent to</p>

<p>attendees disagreed. Although this is a significant increase from previous estimates, Tribal Committee members feel that this estimate does not account for the countless hours put in by staff whose salaries are not paid by MIECHV to complete this report—hours that awardees may not even be able to track or count themselves. Staff supported by MIECHV funds carry out work including capturing missing data, organizing, compiling, carrying out quality control on, and analyzing data, and completing forms.</p>	<p>complete the form. In the case Form 2 performance data, ACF considers the average time and the effort required to fulfill a request along with the financial cost. In general, estimated time includes the time for reviewing instructions, compiling and reviewing for data quality and reporting the data. The estimated time to complete and how it is calculated varies greatly among grant recipients based on the differences among recipient program size, staffing, each program’s organizational reporting structure, etc. Since programs vary across many factors, ACF then tries to come up with an average time per response. Absent additional concrete evidence of higher burden, ACF feels that the updated burden estimates (which were based on experience over the past 8 years with Form 2 reporting) accurately reflect the average burden to recipients. ACF will take into consideration all feedback and consultation regarding burden and will factor this in when preparing for future funding recipients.</p>
<p>Even awardees who agreed that 500 hours a year was a fair estimate pointed out that 500 hours represents nearly 25% of just one staff person’s annual FTE for this single form. A 500 hour burden means that staff spend, on average, 10 hours a week (and, awardees suggest, that estimate is the low end of the range) just working on Form 2. Tribal Committee members would like to take this opportunity to reiterate their belief that a better balance is needed between gathering the crucial information the agency needs to best serve families and children, and knowing when the burden of collecting information outweighs the value of what is collected.</p>	<p>ACF has heard from grant recipients individually as well as in consultation, concerns on the amount of time staff must dedicate to reporting performance measures (along with other grant requirements) and the potential time taken away from providing services. While reporting on these benchmark areas is required for tribal grant recipients per the MIECHV legislation, ACF understands and takes very seriously the fundamental goal of the Tribal MIECHV program is to provide critical home visiting services to children and families. Over the last 10 years ACF has repeatedly made attempts to reduce burden to ensure that while satisfying the legislative mandates, information collected by grant recipients is also important information they can use individually to assess and improve their own program’s performance. Examples of this process include the redesign of performance measures in 2016, development of the Tribal Home Visiting Reporting System (THVRS) to make submitting data easier and to streamline the process, creating grantee tools and resources, as well as targeted and individualized technical assistance with the</p>

	<p>intention of reducing administrative burden for awardees. ACF has also increased focus on continuous quality improvement efforts that support Tribal MIECHV grant recipients to engage with and use performance data to meet their own goals and continually improve practice.</p> <p>While there are additional reports grantees submit as part of their cooperative agreement requirements, each report is different in certain critical areas and provide vital information to ACF and as was stated above - useful information to reflect and continually improve practice and to tell the story of grant recipients to the broader field. Information collected also informs development of current and future funding opportunities and the kinds of supports needed for grant recipients. We look forward to continuing to make these improvements to the program and receiving feedback from organizations like ASTHVI and its Tribal Committee will inform how ACF can support future grant recipients.</p>
<p>Tribal Committee members continue to believe that while some data reporting is essential, it would be helpful to analyze the percentage of the relatively small Tribal MIECHV awards dedicated to reporting and administrative costs.</p>	<p>ACF appreciates the suggestion to analyze the average costs smaller programs dedicate to the reporting requirements for the program and considers this useful information towards future policy decisions. ACF wants to stress as part of the cooperative agreement, project officers work closely with grant recipients to review the budgets recipients submit to ensure each program is functioning adequately. The investment in data for Tribal MIECHV grants goes beyond reporting and supports quality improvement and accountability that is critical to the success of programs. Often, the same staff who support reporting are also supporting quality improvement and accountability processes.</p>