

**Tribal Maternal, Infant, and Early Childhood
Home Visiting Program
Data Reports:**

**Demographic and Service Utilization
Grantee Performance Measures
Quarterly Performance Reporting**

OMB Information Collection Request

**Supporting Statement Part A -
Justification**

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Submitted By:
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Tribal Maternal, Infant and Early Childhood Home Visiting Program
Administration for Children and Families
U.S. Department of Health and Human Services

1. Circumstances Making the Collection of Information Necessary

Section 511 Title V of the Social Security Act created the Maternal, Infant, and Early Childhood Home Visiting (MIECHV) Program and authorized the Secretary of the Department of Health and Human Services (HHS) to award grants to Indian tribes (or a consortium of Indian tribes), tribal organizations, or urban Indian organizations. The most recent reauthorization of the MIECHV program set aside 6 percent of the total MIECHV program appropriation for grants to tribal entities and indicates that the Tribal MIECHV grants, to the greatest extent practicable, be consistent with the requirements of the MIECHV grants to states and territories and include conducting a needs assessment and establishing benchmarks.

The goals of the Tribal MIECHV home visiting program are to support healthy, happy, successful American Indian and Alaska Native (AIAN) children and families through a coordinated, high-quality, evidence-based home visiting strategy, and to continue to build the evidence base for home visiting in tribal communities. The Administration for Children and Families (ACF) and the Health Resources and Services Administration (HRSA), the agencies collaborating to implement the MIECHV program within HHS, also intend for the program to result in a coordinated system of early childhood home visiting in tribal communities that has the capacity to provide infrastructure and supports to assure high-quality, evidence-based practice.

The Tribal MIECHV 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.

There are two types of Tribal MIECHV grant programs: Tribal MIECHV Development and Implementation Grants (DIG) and Tribal MIECHV Implementation and Expansion Grants (IEG). In the first year of their grants, Tribal MIECHV DIG and IEG grant recipients must develop an implementation plan on how they will meet the requirements of the program (the Tribal MIECHV Program Implementation Plan Guidance is currently under review at OMB. See ICR Ref No. 202304-0970-002). In years 2-5 of their grants, grantees are required to submit the following reports, which are the focus of this request:

- Demographic and Service Utilization Data Report
- Performance Measurement Data Report
- Quarterly Performance Data Report

Current Tribal MIECHV grantees that are reporting on the final year of their grants are using versions of these reporting forms that had been previously approved by OMB¹. In comparison to

¹ These are currently approved under OMB #s 0970-0500 and 0970-0389.

the previous forms, these forms have certain data elements and updates to instructions. Updates are intended to ensure the data collection is relevant to these new grantees and to reduce burden by streamlining reporting and to clarify certain terms and definitions to make reporting more concise and easier for grantees to report. ACF did not want to cause confusion for current grantees who are completing reporting requirements and also wanted to consolidate data collections under one number for transparency. Therefore, it was decided to submit these reports and guidance for OMB approval under one new information collection to be used with future cohorts of grantees that will be awarded in FY 23.

2. Purpose and Use of the Information Collection

The purpose of the Tribal MIECHV Reports, is to gather critical information to document how AIAN families are receiving services through the Tribal MIECHV program. There are three types of reports.

- **Tribal MIECHV Demographic and Service Utilization Report** is designed to collect demographic and service utilization data to ensure grantees are serving families that are the most in need of home visiting services including data on the number of newly enrolled and continuing participants, educational level and poverty status of participants, education level of staff and number of home visits. Data from this report is used by ACF to track how grantees are progressing on meeting the goals they identified in their implementation plans and for aggregated reporting that describes and highlights the characteristics of the Tribal MIECHV program.
- **Tribal MIECHV Performance Measures Report** is designed to collect performance data to measure improvements for eligible families in six legislatively mandated areas (referred to as “benchmark areas”) that encompass the major goals for the program. Stipulated in the legislation, data from this report will be used to document improvement of the benchmark areas by grantees. ACF will share this data with grantees for monitoring, discuss successes and challenges and whether technical supports are needed for grantees to meet the requirement.
- **Tribal MIECHV Quarterly Performance Report** collects data on caseload capacity, retention and attrition of enrolled families, and the retention and attrition of program staff. Collecting this information on a quarterly basis tracks how grantees are progressing and helps ACF determine if a grantee is meeting their goals or in need of assistance in a recurring way. It also allows grantees to reflect on the services they are providing.

Overall, ACF will use this information towards monitoring of grantee compliance, and to inform any future technical assistance and policy decisions. Some of this data may also be used to respond to reauthorization provisions regarding an annual report to Congress and an outcomes dashboard.

3. Use of Improved Information Technology and Burden Reduction

The forms and guidance will assist grantees submitting their data reports via the Tribal Home Visiting Reporting System (THVRS).

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

Tribal Home Visiting grantees must comply with the requirement to submit demographic and service utilization data once they begin to provide services, and then on an annual basis. Grantees also begin to report quarterly on caseloads and family and staff retention once they begin implementing their programs. To meet the benchmarks requirement, grantees submit their performance data once they begin providing services to show demonstration of improvement over time. To assist grantees with meeting these requirements, ACF created these reporting forms and guidance for grantees to use to meet the goals and objectives set forth at the beginning of their grants. A less frequent collection of these data would be inconsistent with HHS grants policy and the MIECHV legislative requirements and would undermine the federal government's ability to track progress of improvement and would limit the ability to provide technical assistance in a timely and targeted manner.

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 April 10, 23 (88 FR 21192) and provided a sixty-day period for public comment. During the notice and comment period, we received no comments from the public.

Consultations

This information collection and the program it supports was informed by broad engagement of tribal communities, including these notices inviting public comment, as well as feedback from listening sessions with current grant recipients on their experiences meeting program requirements, including the requirements on reporting. Feedback was factored into streamlining the reporting process by reducing some areas to decrease burden and to better clarify reporting instructions. Collaboration with technical assistance providers was also used to help assist with developing the reports and any information to help assist respondents. Through these activities, ACF did not request the same information of more than nine respondents and therefore they were not subject to the Paperwork Reduction Act.

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 questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

At the end of FY23, it is estimated there will be 55 grantees. To calculate the burden estimate, ACF considered the following:

- a. the estimated time per response for a grantee based on experience from previous cohorts of grantees,
- b. feedback from grantees as part of the consultation process,
- c. discussions with TA providers, and
- d. a review of each data field to determine if there is any data that ACF requires that grantees are not already reporting. Considerations included whether grantees collect this data already because of their own organization's information collection or part of the home visiting model that is being implemented. After the review, ACF determined there was only one data point required under the MIECHV legislation that grantees would not already collect in the course of home visiting implementation (Demographic and Service Utilization Report Table 16. Priority Population Household Characteristics - Newly Enrolled). Based on all these considerations, the estimated burden includes the average number of families served and the average number of hours it takes a grantee to

gather and then report information on the topics listed and the average number of minutes it takes a family to respond to the one data element.

Based on the above, we have calculated burden estimates as follows:

- **Tribal MIECHV Demographic & Service Utilization Data Report:**
 - We estimate average the number of families that will be served with this new information collection by first estimating the number of families served by grantees in FY22. Twenty-three grantees served 1668 families in FY 2022, which averages to about 72 families per grantee. We estimate 3 hours for data collection, entry, cleanup per family (217 hours). We estimate 100 hours per grantee for reporting. Therefore, the average burden hours per grantee is estimated to be 317 hours per year.
 - We estimate the burden for families to respond to the one additional data element required by ACF to be 30 seconds. Based on 1668 families responding once to this data element, the average burden per family is estimated to be 14 minutes.
- **Tribal MIECHV Performance Measures Report:** Based on an average of 72 families per grantee, we estimate 4 hours for data collection, analysis and reporting (2 hours per family and 2 hours to clean and submit data). Therefore, the average burden hours per grantee is estimated to be 288 hours per year.
- **Tribal MIECHV Quarterly Performance Report:** We estimate the quarterly reports take an average of 2.5 hours per quarter to complete. All 55 grantees will complete these.

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Annual Cost
Tribal MIECHV Demographic & Service Utilization Data Report (Grantees)	55	1	317	17,435	\$40.00	\$697,400
Tribal MIECHV Demographic & Service Utilization Data Report (Families)	1668	1	14 minutes	389	\$7.00	\$2,723
Tribal MIECHV Performance Measures Report	55	1	288	15,840	\$40.00	\$633,600
Tribal MIECHV Quarterly Performance Report	55	4	2.5	550	\$40.00	\$22,000
Estimated Totals:				34,214		\$1,355,723

To calculate the estimated annual cost to grantee respondents, we used 2022 wage data from the Bureau of Labor Statistics for job code 21-1093 (Social and Human Service Assistants), which is \$20.00 per hour. To account for fringe benefits and overhead, the rate is multiplied by two which is \$40.00. To calculate the estimated annual cost per family respondent, we used the 2023 HHS Poverty Guidelines which averages out to \$7.00 an hour.

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

<https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

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
Tribal Home Visiting Reporting System (THVRS) (Contracted)	Modifications, maintenance, data cleaning and aggregation of the electronic reporting system.	\$78,000
Government 5 Program Analysts (20%)	Project management and oversight, and consultation.	\$155,000
Total Estimated Annual Cost		\$233,000

Government costs include personnel costs for federal staff involved in project and contract oversight, instrument design, and analysis which includes approximately 20% of 5 GS-13 Federal Project Officers.

15. Explanation for Program Changes or Adjustments

This is a new information collection.

16. Plans for Tabulation and Publication and Project Time Schedule

Aggregation and descriptive statistics on demographic and service utilization and 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 reports to Congress, data dashboards, data briefs, fact sheets, professional

presentations, and/or published manuscripts.

Project Timeline

The following schedule reflects the dates when IEG & DIG grantees begin reporting. For DIG grantees, data collection starts after their implementation plans have been approved at the end of their first year. For IEG grantees, because they are already providing services, data collection begins at the start of their grant awards. Tribal Home Visiting Reporting Forms will then continue on an annual/quarterly schedule throughout the OMB approved clearance timeframe.

Activity	Time Schedule IEG	Time Schedule DIG
Tribal MIECHV Demographic & Service Utilization Report	9/29/23	9/29/2024
Tribal MIECHV Performance Measures Report	9/29/23	9/29/2024
Tribal MIECHV Quarterly Performance Report	9/29/23	9/29/2024

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

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

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.