

Attachment A

**ACF Response to Public Comments on the Tribal Maternal, Infant, and Early
Childhood Home Visiting Program: Implementation Plan Guidance**

The Association for State and Tribal Home Visiting Initiative (ASTHVI) Tribal Committee provided comments during the 60-day comment period (FR Vol. 88 No.25 7978) for the Tribal Maternal, Infant, and Early Childhood Home Visiting Program: Implementation Plan Guidance. After reviewing the comments, ACF has provided the following responses.

ASTHVI Comment	ACF Response
<p>For all Tribal applicants, new and returning, additional technical assistance for future opportunities would be appreciated and heavily utilized by grantees. For new applicants in particular, ASTHVI Tribal Committee members believe that the administrative burden associated with completing this application is more than double what ACF has estimated; our members believe 2500 hours is a more accurate representation of time spent on this application. Multiple ASTHVI members recalled spending a full 6 months working alongside additional staff, focused full-time on preparing their first application. For returning grantees, Tribal Committee members agreed with ACF’s estimate of 1000 hours, as that has been the experience of returning applicants in the past.</p>	<p>ACF appreciates ASTHVI’s feedback on reauthorization of the Maternal, Infant, and Early Childhood Home Visiting (MIECHV) program and the Tribal MIECHV program. It appears that feedback from ASTHVI is in response to the number of hours it takes to apply for either Development and Implementation Grants (DIG) or Implementation and Expansion Grants (IEG). Currently ACF has Notice of Funding Opportunity (NOFO) announcements published for both DIG and IEG programs. While the response regarding burden is not specific to the Federal Register Notice and the Tribal MIECHV Implementation Plan (IP) Guidance documents, we want to assure ASTHVI that we understand it takes a lot of time and effort to apply. To that end, ACF recently hosted two webinars for prospective applicants, one for Development and Implementation and one for Implementation and Expansion NOFO’s, which can be found on the Tribal MIECHV website at ACF. https://www.acf.hhs.gov/ecd/tribal/tribal-home-visiting</p> <p>We look forward to working with future grant recipients and have developed the IP Guidance based on listening sessions with current grantees and reflections shared in sources like grantee progress reports and Annual Reports to the Secretary to gauge their experiences meeting the requirements. We also worked with technical assistance (TA) providers to develop the guidance and the supports grant recipients may need during the critical first year of their grants. Including engaging with their communities on their needs and priorities when developing a program plan that reflects the goals of each grantee so they can be successful providing critical home visiting services to their communities.</p>