

# **Tribal Maternal, Infant, and Early Childhood Home Visiting Program Implementation Plan Guidance**

**OMB Information Collection Request**

## **Supporting Statement Part A - Justification**

**April 2023**

Submitted By:  
Office of Early Childhood Development  
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**

As part of the Consolidated Appropriations Act, 2023 (Public Law 117-328), Section 511 of Title V of the Social Security Act authorizes 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 to conduct an early childhood home visiting program. The legislation sets aside 6 percent of the total Maternal, Infant, Early Childhood Home Visiting (MIECHV) appropriation for grants to tribal entities and requires that the tribal 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 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 Home Visiting discretionary grants support cooperative agreements to conduct community needs assessments; plan for and implement high-quality, culturally grounded, 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 Implementation Plan Guidance consists of guidance for these grant programs for developing their implementation plans.

## **2. Purpose and Use of the Information Collection**

The purpose of the Tribal MIECHV Implementation Guidance is to assist DIG and IEG grant recipients during the planning phase, by providing critical information and resources during Year 1 of their grants, so recipients understand the requirements and develop implementation plans that reflect the needs of their communities and as a condition for receiving non-competing continuation funding for program implementation. (Implementation Phase, Years 2-5).

ACF will also use the information from grantee implementation plans as the guidance is intended for a blueprint on how to support grant recipients as they come on board with their new grant awards. Guidance for both programs has vital information for recipients to determine how they will provide services to families, and will ensure ACF receives necessary information to monitor recipients when implementing their programs and to inform and provide technical assistance.

**3. Use of Improved Information Technology and Burden Reduction**

The guidance will assist grantees submitting their implementation plans via GrantSolutions.gov per instructions provided to each grantee by the Federal Project Officer.

**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 during year 1 of their cooperative agreements to submit an implementation plan that should feature planned activities to be carried out under the program in years 2-5 of their grants. To assist grantees with meeting these requirements, ACF created guidance for grantees to use when writing their plans in Year 1. The guidance will only be utilized in the first year unless a grantee must revise portions of their plans to meet the goals and objectives set forth at the beginning of their grants.

**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, February 7, 2023, Vol.88, No. 25 (Pages 7978 and 7979) and provided a sixty-day period for public comment. During the notice and comment period, we received one comment from the public, from the Association of State and Tribal Home Visiting Initiatives (ASTHVI). Attachment A includes ACF’s response to these comments. 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, correspondence from home visiting associations, and technical assistance providers.

**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**

The estimated time per response is based on experience providing guidance and technical assistance support to grantees from previous cohorts. The guidance has been refined and streamlined and an extensive 15-month for DIG and 12-month for IEG technical assistance plan has been developed between technical assistance providers and Federal Project Officers. The time includes the average number of hours it takes a respondent to gather and then report information on the topics listed.

Information Collection Title	Total Number of	Annual Number of	Average Burden	Annual Burden	Average Hourly	Total Annual/Final
------------------------------	-----------------	------------------	----------------	---------------	----------------	--------------------

	Respondents	Responses Per Respondent	Hours Per Response	Hours	Wage	Cost
Implementation Plan Guidance for Development and Implementation Grantees	13	1	1,000	13,000	\$38.90	\$38,900
Implementation Plan Guidance for Implementation and Expansion Grantees	35	1	1,000	35,000	\$38.90	\$38,900
Estimated Totals:				48,000		\$77,800

\*Note that this estimate is for Year 1 of the grants. There may be rare occasions where a grantee may revise a small portion of their implementation plans and may refer back to the guidance. The time to complete revisions is expected to be minimal and the current burden estimate is expected to cover those revisions.

To calculate the estimated annual cost to respondents, we used 2021 wage data from the Bureau of Labor Statistics for job code 21-1093 (Social and Human Service Assistants), which is \$19.45 per hour. 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 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
5 Government Program Analysts (40%)	Project management and oversight, and consultation.	\$310,000
Total Estimated Annual Cost		\$310,000

Government costs include personnel costs for 5 federal staff involved in project oversight, which includes reviewing and approving grantee implementation plans which this guidance supports which includes approximately 40% 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**

The Implementation Plan Guidance consists of guidance for two types of Tribal MIECHV grant programs: Tribal MIECHV DIG and Tribal MIECHV IEG. In the first year of their grants, Tribal MIECHV DIG and IEG grant recipients are required to develop an implementation plan on how they will meet the requirements of the program. ACF has no plans to publish grantee implementation plans. However, some aggregate information may be submitted per MIECHV reauthorization, annual report to Congress.

Project Timeline

<b>Activity</b>	<b>Time Schedule</b>
Distribute guidance to Tribal MIECHV Development & Implementation & Implementation Grantees	7/1/2023
Distribute guidance to Tribal MIECHV Implementation & Implementation and Expansion Grantees	9/29/2023
Tribal MIECHV Grantee Implementation Plan Guidance will continue on an annual schedule throughout the OMB approved clearance timeframe in the event there are new cohorts of grantees awarded during the clearance timeframe.	

**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.