

# **Tribal Maternal, Infant, and Early Childhood Home Visiting Program: Guidance for Submitting an Annual Report to the Secretary**

**OMB Information Collection Request  
0970 - 0409**

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

**September 2024**

**Type of Request: Revision**

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

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 (AI/AN) 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.

After the first grant year, Tribal Home Visiting grant recipients must comply with the legislative requirement to submit an Annual Report to the Secretary that should feature activities carried out under the program during the past reporting period. To assist grant recipients with meeting these requirements, ACF created guidance for grant recipients to use when writing their annual reports. The guidance specifies that grant recipients must address the following:

- Update on the implementation of the Home Visiting Program in targeted community(ies)
- Update on the collection, reporting, and use of data
- Progress toward fidelity monitoring, program management, and improvement
- Update on contribution to MIECHV Learning Agenda through participation in research and evaluation projects
- Dissemination
- Technical Assistance Supports

Previously, the guidance included information about both the annual and the final reports from grant recipients. This request includes updates to the guidance to make it specific to just the annual reports while we determine if the annual report guidance could be used for the final report. If it is decided that guidance specific to the final report would be beneficial, we will submit a request to OMB in the future. We have also revised the annual report to streamline significantly and align with the previous estimated burden. At this time, we are requesting to extend approval of this information collection for an additional three years with the changes implemented.

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

The purpose of the guidance is to provide instructions for grant recipients to submit an annual report on the progress of their program to the Secretary. These reports have provided valuable information to HHS and have been used for a number of different purposes including guiding the provision of training and technical assistance to Tribal Home Visiting program grant recipients, a report to Congress on the status of the program, dissemination activities that highlight the successes and lessons learned of the program, as well as information that assists ACF in developing future policy, program, and collaboration efforts with tribal communities. ACF reviewed the annual report guidance to identify areas where information could be clarified and/or streamlined while still fulfilling the purpose and use of this data collection. While the purpose and use remains the same, we have significantly streamlined the report. We also plan to remove the final report guidance for now and will either use the annual report guidance for final reports or will submit a request specific to new final report guidance, if ACF deems it necessary for the final year.

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

Reports shall be submitted via GrantSolutions.gov per instructions provided to each grant recipient 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**

This is an annual submission that Tribal Home Visiting grant recipients must submit after the first year of their grants. Collecting information less frequently would violate the MIECHV statute and would make it difficult to assess grant recipient progress throughout the life of the

grant and effectively target and provide technical assistance to grant recipients. The guidance provides valuable information to grant recipients to meet the requirement to provide an annual report that summarizes the progress grant recipients made on meeting all 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 June 5, 2024 (89 FR 48168) and provided a sixty-day period for public comment. During the notice and comment period, one comment was received, which is described below.

During the notice and comment period, we received a single public comment from the Association of State and Tribal Home Visiting Initiatives (ASTHVI). The comment covered various aspects of the Guidance for Submitting Annual Reports, such as the estimate of burden hours, duplication among reporting, TA reporting, the timing of reporting, monthly calls, automated reporting opportunities, and feedback considerations. These recommendations were carefully considered, and each one was addressed individually. ACF's comprehensive response to these comments and the changes being considered for each recommendation can be found in Attachment A, all aimed at improving the Tribal MIECHV Program and addressing the concerns raised in the public comment.

In addition, as part of a collaborative effort to improve the Tribal MIECHV Program, Tribal Home Visiting ACF engaged grant recipients through unstructured and individualized discussions to learn about their experiences and gain valuable feedback. One of the topics discussed was administrative burden, including the challenges associated with the forms and reports of the Tribal MIECHV Program. ACF also discussed with grant recipients about the utility of the annual report, clarity of the instructions, reporting format, and views on the data elements being recorded. The information learned through these discussions with home visiting associations and technical assistance providers was crucial in shaping our decisions when revising the Guidance for Submitting Annual Reports.

## **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 since requiring the reports from grant recipients. The time includes the number of hours it takes a respondent to gather and then report information on the topics listed. Fifty-three total respondents are projected to be implementing home visiting services by FY 2027 and will be required to submit an annual report to the Secretary regarding the program and activities carried out under the program. Although the estimated time per response remains the same as previously estimated, ACF realized that the effort for the previously approved annual report was more than the estimated average of 25 hours. As such, ACF made an effort to review the guidance, engage grant recipients, and make substantial edits. With these edits, ACF believes the estimated average time of 25 hours to complete the annual report is now accurate.

| 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 |
|---|-----------------------------|---|-----------------------------------|---------------------|---------------------|-------------------|
| Guidance for Submitting Annual Reports to the Secretary | 53                          | 1   | 25                                | 1,325               | \$42.54             | \$56,366          |

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Service Assistants [21-1093] and wage data from May 2023, which is \$21.27 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$42.54.

[https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.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 includes federal staff time for project oversight and development. 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-13 Program Specialist.

| Type of Cost                     | Description of Services                             | Annual Cost |
|----------------------------------|---|-------------|
| Government Program Analyst (10%) | Project management and oversight, and consultation. | \$14,295    |

**15. Explanation for Program Changes or Adjustments**

Section 511(h)(6)(A)(iii) of Title V of the Social Security Act requires the Secretary of Health and Human Services to reduce the burden on states and public and private implementing agencies at the local level of administrating MIECHV. This includes reviewing paperwork and data collection requirements for tribal grant recipients and exploring, in consultation with tribes and tribal organizations, ways to reduce administrative burden, respect tribal sovereignty, and acknowledge the different focus points for tribal recipients. ACF acknowledges that the prior burden estimate under estimated the level of effort for grant recipients and therefore made a concerted effort to reduce the burden by doing a thorough review of the guidance and engaging grant recipients. As a result, substantial edits were made to the annual report which have resulted in a version that is in line with the average estimated time to complete of 25 hours.

The Tribal MIECHV Program is being expanded. For the fiscal years 2023-2027, Congress has increased the Tribal MIECHV set aside from 3 percent to 6 percent as part of the Consolidated Appropriations Act, 2023 (Public Law 117-328). Section 511 of Title V of the Social Security Act gives the Secretary of Health and Human Services (HHS) the authority to provide grants to Indian tribes, tribal organizations, or urban Indian organizations for conducting early childhood home visiting programs. With these new awards, the number of tribal entities implementing home-visiting services is estimated to increase from 41 to 53 by FY 2027.

**16. Plans for Tabulation and Publication and Project Time Schedule**

Tribal Home Visiting grant recipients were notified that after the first year of their grant, they must comply with the requirement for submission of an Annual Report to the Secretary regarding the program and activities carried out under the program. This report shall be submitted to HHS by Tribal grant recipients as instructed by ACF at the end of each operating year of the grant (“annual report”). Grant recipients will continue to submit their reports annually. ACF has no plans to publish the report to the Secretary. However, some aggregate information may be published.

**Project Timeline**

| Activity  | Time Schedule   |
|---|-----------------|
| Continue to distribute guidance to Tribal MIECHV grant recipients   | Ongoing         |
| Tribal MIECHV Annual Report   | Due by 12/31/25 |
| Tribal MIECHV Grant recipient Annual Reports 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.