

Attachment A

**Tribal Maternal, Infant, and Early Childhood Home Visiting (MIECHV)
program Guidance for Submitting Annual Reports**

The Association for State and Tribal Home Visiting Initiative (ASTHVI) Tribal Committee provided comments during the 60-day comment period (89 FR 48168) for the Tribal Maternal, Infant, and Early Childhood Home Visiting Program: Guidance for Submitting Annual Reports OMB #: 0970-0409). After reviewing the comments, ACF has provided the following responses.

ASTHVI Comment	ACF Response
<ol style="list-style-type: none"> 1. For annual reporting burden estimates, Tribal administrators believe the ACF estimate of 25 burden hours should at least be doubled; the reflection and organizing required of multiple staff members is time consuming and more likely to fall around 50 hours than 25. 2. Where possible, eliminate duplication among all reporting obligations. 3. While technical assistance is appreciated, the annual reporting requirement for information about TA feels burdensome and unnecessary. Administrators report feeling the need to provide lengthy information in order to show their support of TA, which is a time consuming process. 	<ol style="list-style-type: none"> 1. ACF appreciates ASTHVI's feedback on the proposed revisions to an approved information collection: Tribal Maternal, Infant, and Early Childhood Home Visiting (MIECHV) program Guidance for Submitting Annual Reports. Regarding the estimated number of burden hours, ACF used a 25-hour estimate in the previous guidance (i.e., Guidance for Submitting an Annual Report to the Secretary), but ACF agrees that this underestimated the actual burden hours for the last annual report. As a result, significant changes have been made, including a thorough review of the previous annual report to identify areas of duplication and streamline the annual report to reflect the 25-hour estimate more accurately. Further details about these changes are also provided below. 2. As requested, ACF worked diligently to reduce duplication (including eliminating the semi-annual Program Progress Report requirement). A significant change in the annual report was the streamlining of requirements, resulting in a 10-page reduction for the annual report guidance from 14 pages to 4. 3. Section 6, technical assistance, is designed to evaluate whether grant recipients' TA needs are met and, if not, what additional support would be helpful. ACF values the feedback of all recipients, whether their TA needs are met or not. To reduce unnecessary burden, ACF has modified the TA reporting section to allow recipients to respond "yes" if their TA needs are met

<p>4. Administrators request that they receive information on what will be asked of them for end of the year reporting at the beginning of the year, allowing them to track that information throughout the year and making final reporting easier.</p> <p>5. Reconsidering monthly phone calls regarding annual reporting, if information has already been shared and reflected on.</p>	<p>and "no" if they do not have any recommendations on improving TA support. However, ACF also wants to provide other recipients with unmet TA needs the opportunity to express those needs and share ideas for how ACF can fulfill them. It is therefore at the discretion of the grant recipient how much information they wish to include in response to this section.</p> <p>4. ACF recognizes that early communication is crucial in preparing recipients for their reporting obligations and reducing the burden of collecting information from grant recipients. At the start of each grant year, ACF provides recipients with a document laying out their reporting requirements for the coming year (at minimum). ACF communicates in the NOFO that after the first year of the grant, grant recipients are required to submit a detailed annual report to the Secretary. As grant recipients approach their second year of reporting, ACF will seek ways to integrate the annual report with the other reporting requirements specified in their Implementation Plan Guidance, making it easier for all administrators to track the information throughout the year and simplify final reporting.</p> <p>5. Tribal MIECHV recipients have the opportunity to discuss their annual reports during the grant recipient performance review call each February. Before the call, Federal Project Officers (FPOs) carefully evaluate the annual reports to ensure an effective discussion. Each February, FPOs hold a call with recipients to review their performance, including the annual report and other reporting requirements for Tribal MIECHV. It's important to note that the annual report (as well as other end of year reports) is only discussed during the</p>
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<p>6. Administrators are curious about automated reporting opportunities but do believe that, as no program has the same measurements, such efforts seem easier said than done; all Tribal programs have a different story to tell, and this may get lost in automation. However, an automated system that details what prior information regarding a specific reporting question has already been submitted would be very welcome as an option for reducing administrative burden.</p> <p>7. Tribal administrators also would appreciate detailed, timely feedback on their annual reports. As programs spend, according to their estimates, around 50 combined hours on this requirement, feedback on how the information provided is being used and by whom would be meaningful to programs and staff.</p>	<p>February call and not during any other monthly calls.</p> <p>6. ACF is grateful for the idea of automated reporting and agrees that it is a complex task, given the unique narratives of each Tribal program. Nevertheless, ACF is committed to reducing duplicative reporting and is actively working to understand the program's existing data needs through a comprehensive process. This involves reviewing existing data sources and documentation. In line with this, ACF will consider automation-led approaches where suitable to address reporting inquiries that have already been raised.</p> <p>7. The deadline for submitting annual reports is December 31st. Grant recipients receive feedback on their reports (including the annual report and the demographic and service utilization and performance measurement reports) in February following this submission, only a month later. This allows FPOs to review each report thoroughly in preparation for providing detailed feedback in February. ACF deeply appreciates the hard work and dedication put into completing these reports. The annual report aims to collect detailed, contextualized information that cannot be found in other Tribal MIECHV reporting. The annual reports provide unique insights, including qualitative information about program implementation, success stories, testimonials, and recommendations for improving ACF's support to grant recipients. The information recipients provide will help inform individual support and technical assistance and shape future</p>
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	<p>policy decisions. We at ACF are truly grateful for the amazing contributions of our grant recipients. Their support is essential in ensuring the continued success of the Tribal MIECHV Program.</p>
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