



Dr. Laurie Todd-Smith
Deputy Assistant Secretary for Early Childhood Development
Administration for Children and Families
U.S. Department of Health and Human Services
330 C St SW, Washington, DC 20201

June 26, 2025

Dear Dr. Todd-Smith,

The Association of State and Tribal Home Visiting Initiatives is grateful for the Administration for Children and Families' efforts to continuously strengthen and grow opportunities to serve families through home visiting and for the opportunity to comment on proposed changes to the Tribal Maternal, Infant, and Early Childhood Home Visiting (MIECHV) Program: Implementation Plan Guidance and Community Needs and Readiness Assessment (CNRA) Guidance (OMB #0970-0611). ASTHVI convened a meeting of its Tribal Home Visiting Committee for the purpose of discussing and responding to the FRN notice, and is pleased to share the observations below.

ASTHVI is a non-partisan, non-lobbying professional association of state and Tribal home visiting administrators dedicated to supporting members in the effective implementation and improvement of home visiting programs at the state, territory, and Tribal level. ASTHVI works through peer-to-peer support and cross-program collaboration to elevate best practices that maximize the benefit of home visiting initiatives to children, families, and society as a whole. As part of this work, the ASTHVI Tribal Committee holds quarterly meetings for Tribal members to share updates on their programs and exchange strategies for addressing common challenges.

Tribal Committee members are thankful for the progress ACF has made in reducing administrative burden for Tribal MIECHV awardees. It is clear to Tribal grantees that ACF incorporated feedback from implementation of previous CNRAs. For example, the decision to make the logic model optional was very well received by the Committee. ASTHVI members also appreciate that the implementation process is less scripted and more flexible. While the

majority of Tribal Committee members have already gone through the CNRA, all are supportive of efforts to make this process less burdensome for future awardees.

The Tribal Committee wishes to share the following feedback regarding the proposed changes to the implementation plan guidance and the CNRA:

- *Improve communication and reduce response times:* Some Tribal members reported waiting several weeks to receive responses from ACF to requests for guidance and feedback. As you know, program administrators are unable to begin the next stage of implementation until their plans are approved. Delayed responses inhibit administrators' ability to begin executing these proposals and can have implications for hiring, staff retention, family enrollment, local support, and other pieces of the complex puzzle that must be assembled for home visiting program success.
- *Extend the time to respond to required updates and changes:* Tribal MIECHV programs need more time to adjust to new Tribal MIECHV requirements. Many Tribal programs face staff shortages that limit their capacity to implement the requisite changes without impeding other work. Additionally, a number of Tribes are located in remote regions where inclement weather conditions make the in-person coordination required among community groups for implementation more difficult. In particular, any flexibility that can be given around the holiday and winter season is much appreciated.
- *Streamline the process for Tribes that have completed implementation:* Tribal awardees that have already completed and received approval of plans or reporting should be required to submit subsequent plans that detail only proposed changes or updates. HRSA has periodically implemented a similar policy for state reporting, and this reduction in administrative burden has been well received among ASTHVI members in state government.

ASTHVI members appreciate your request for and receptiveness to our members' feedback and your continued improvements to support Tribal MIECHV programs.

Sincerely,

Catriona Macdonald
Executive Director