

# **Tribal Home Visiting Program Information Collection for Revision to Community Needs Readiness Assessment (CNRA)**

**Formative Data Collections for Program Support**

**0970 – 0531**

## **Supporting Statement**

### **Part A - Justification**

**May 2024**

Submitted By:  
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Administration for Children and Families  
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## **A1. Necessity for the Data Collection**

The Office of Early Childhood Development (ECD) at the Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for completing a focus group with representatives from seven Tribal Maternal, Infant, and Early Childhood Home Visiting (Tribal MIECHV) grant recipient teams who recently planned and finalized a Community Needs and Readiness Assessment (CNRA)<sup>1</sup> as part of their requirements for the Tribal MIECHV Program: Development and Implementation Grants.

### ***Background***

The legislation requires that grant recipients under the MIECHV program for states and jurisdictions conduct a needs assessment. Similar to the assessment required for all States under subsection (b). Section 511 (h)(2)(A), the legislation states that the requirements for recipients under the MIECHV program for tribes, tribal organizations, and urban Indian organizations are to be consistent, to the greatest extent practicable, with the requirements for recipients under the MIECHV program for states and jurisdictions. To respond to the needs assessment requirement, ACF has instructed Tribal MIECHV grant recipients to conduct the Tribal MIECHV CNRA during the first year of the grant award. The CNRA assists grant recipients in determining the priorities, goals and hopes of their programs by engaging with community members and to determine which evidence-based home visiting model best suites the needs of their community.

Reauthorization of MIECHV in 2023 stipulated that Health Resources and Services Administration (HRSA)<sup>2</sup> and ACF examine and determine where there are opportunities to reduce burden to grant recipients. Per the requirement established by MIECHV reauthorization in Section 511(h)(6)(A)(iii), ECD has been engaging in dialogue with grant recipients regarding the administrative burden associated with Tribal MIECHV. Feedback provided by grant recipients indicated the needs assessment requirement and guidance are burdensome, focuses primarily on the risk factors outlined in the legislation rather than a balance of protective factors, and may not adequately respect tribal sovereignty by requiring grant recipients to collect data listed in the legislation, which focuses on legislative risk factors that fail to reflect the story of tribal communities adequately and undermines the Nation-to-Nation trust relationship that ECD is engaging in with tribes. In addition, some of the data requires recipients to gather data that may not be readily available at a level beneficial to their program planning and design (due to small sample sizes or lack of capacity to collect these data).

Based on this feedback, and also in response to [Executive Order 14112](#) regarding respecting tribal sovereignty, ECD is considering modifying the [Community Needs and Readiness Assessment \(CNRA\) guidance](#) to give grant recipients the flexibility to collect data that they feel would be more useful and appropriate for them to collect in order to plan, design, and implement their home visiting programs.

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<sup>1</sup> The CNRA is approved under OMB #: 0970-0611.

<sup>2</sup> The MIECHV program is administered by HRSA's Maternal and Child Health Bureau in partnership with the Administration of Children and Families (ACF), which administers the Tribal MIECHV Program

### ***Legal or Administrative Requirements that Necessitate the Collection***

There are no legal or administrative requirements that necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

## **A2. Purpose of Survey and Data Collection Procedures**

### ***Overview of Purpose and Use***

The proposed focus group would engage representatives from Development and Implementation Tribal Home Visiting grant recipients (anticipated fourteen to fifteen representatives) and is intended to identify opportunities to provide technical guidance on the CNRA to reduce duplication and streamline the process. The findings from the focus group will help ECD prioritize the knowledge and experiences of grant recipients who most recently completed the CNRA and have a vital understanding of the challenges and obstacles grant recipients face when undertaking CNRA in tribal communities.

Data collected from the focus group session will also assist ECD in making informed revisions and adjustments to the current CNRA that consider the unique needs, limited capacity, or significant barriers tribal communities face. These revisions and adjustments would reduce the burden, allow for more flexibility in reporting, and be responsive to tribal communities' programmatic needs while also highlighting community protective factors.

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531):

- Delivery of training or technical assistance (TA) and/or workflows related to program implementation or the development or refinement of program and grantee processes.
- Planning for provision of programmatic or evaluation-related T/TA.
- Obtaining feedback about processes and/or practices to inform ACF program development or support.

### ***Processes for Information Collection***

Information will be collected during one virtual focus group session with approximately fourteen to fifteen representatives from Development and Implementation grant recipients who recently completed the CNRA process. A semi-structured focus group guide will be used, and grantees will be asked about their experiences with the CNRA process, what was helpful during the process, and recommendations for reducing duplication and streamlining the CNRA requirements. To capture what is being said during the focus group session, the responses from the grant recipients will be recorded and transcribed for analysis, as well as chat discussions and polling results.

Following the focus group, ACF will review the feedback from grant recipients to identify revisions to the CNRA guidance and TA approach to supporting grant recipients. The revisions will be considered from the lens of feasibility and usefulness and each change will be documented clearly in a table format that crosswalks the current guidance, feedback from grant

recipients, and proposed revisions to the guidance. A similar table will be created outlining the current TA approach, feedback from grant recipients, and proposed changes to TA approach. The tables will be used for internal planning purposes.

### **A3. Improved Information Technology to Reduce Burden**

The focus group will take place in a secured cloud-based video conference room. Participants will be given a password-protected hyperlink to join the video conference room. Some questions may be asked over the poll function in the conference room. With respondent permission, the focus group will be recorded.

### **A4. Efforts to Identify Duplication**

There are no current assessments for evaluating and identifying the administrative burden associated with the CNRA. Also, no similar data collections exist for grant recipient feedback related to the CNRA.

### **A5. Involvement of Small Organizations**

The project will include tribal human service agencies. We will only request information required for the intended use. Participation in the focus group will be voluntary, and the scheduling of the focus group session will be at times convenient for the fourteen to fifteen grant recipients who confirm interest in participating.

### **A6. Consequences of Less Frequent Data Collection**

This is a one-time data collection.

### **A7. Special Circumstances**

There are no special circumstances for the proposed data collection efforts.

### **A8. Federal Register Notice and Consultation**

#### ***Federal Register Notice and Comments***

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 request to extend approval of the umbrella generic with minor changes. The notice was published on January 28, 2022, (87 FR 4603), and provided a sixty-day period for public comment. ACF did not receive any comments on the first notice. A second notice was published, allowing a thirty-day period for public comment, in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice.

### ***Consultation with Outside Experts***

Beyond the listening session mentioned above where the program received initial feedback, no other consultations have taken place with experts outside of the project team.

### **A9. Tokens of Appreciation for Respondents**

No tokens of appreciation for respondents are proposed for this information collection.

### **A10. Privacy of Respondents**

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private.

### **A11. Sensitive Questions**

There are no sensitive questions in this data collection.

### **A12. Estimation of Information Collection Burden**

#### ***Burden Estimates***

The focus group session will include fourteen to fifteen respondents: two individuals, usually the program coordinator and one other key staff member, per grant recipient for Development and Implementation Grantees Cohort 2 (DIG2). The focus group session will take 90 minutes, and the facilitators will use a semi-structured instrument.

#### ***Cost Estimates***

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)

Instrument	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Instrument 1: Tribal Home Visiting Program Information Collection for Revision to CNRA Focus Group Discussion Guide	15	1	1.5	22.5	\$42.54	\$957

### **A13. Cost Burden to Respondents or Record Keepers**

There are no additional costs to respondents.

**A14. Estimate of Cost to the Federal Government**

The total cost for the data collection activities under this current request will be \$893.

**A15. Change in Burden**

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531).

**A16. Plan and Time Schedule for Information Collection, Tabulation and Publication**

The focus group session, which will take place during a 90-minute session planned for May 2024, pending OMB approval. The results will be used to inform possible revisions to Section 1: CNRA of the Tribal MIECHV Implementation Plan Guidance (IPG) for up to 6 new grant recipients expected to start July 1, 2024.

**A17. Reasons Not to Display OMB Expiration Date**

All instruments will display the expiration date for OMB approval.

**A18. Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions are necessary for this information collection.

**Attachments**

Instrument 1: Tribal Home Visiting Program Information Collection for Revision to CNRA  
Focus Group Discussion Guide