

Tribal Maternal, Infant, and Early Childhood Home Visiting Program Community Needs and Readiness Assessment Guidance and Implementation Plan Guidance

**OMB Information Collection Request
0970 – 0611**

Supporting Statement Part A - Justification

May 2025

Type of Request: Revisions to an Approved
Information Collection

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 MIECHV 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 program, 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, 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 AI/AN populations.

The ACF Office of Early Childhood Development (ECD) developed the Tribal MIECHV Implementation Plan (IP) Guidance and the Community Needs Readiness Assessment (CNRA) guidance to assist grant recipients in developing their home visiting programs and meet the requirements of their cooperative agreements. This request includes proposed revisions that were identified to streamline the reporting process, eliminate unnecessary items, and clarify the requests.

2. Purpose and Use of the Information Collection

The first year of the Tribal MIECHV cooperative agreements are designated as “Year 1 activities”. Year 1 activities consist of a two-step process. First, grant recipients conduct a CNRA and the CNRA Guidance is designed to assist grant recipients by providing clear instructions for conducting the CNRA, including collecting data on community needs, assets,

strengths and opportunities assessments, and analyzing this data.

Second, grant recipients prioritize their findings from the CNRA analysis and use findings to create their IP. The IP Guidance offers detailed instructions for developing an implementation plan, including finalizing the program design, creating a program blueprint, and establishing a system for collecting and tracking performance data, demographic and service utilization data and quarterly data. In its entirety, grant recipient implementation plans provide vital information for recipients on how they will provide home visiting services to families.

Previous versions of the guidance combined CNRA and implementation activities into one document. This request includes proposed revisions to the process. The Tribal MIECHV program has revised the guidance by separating out the CNRA Guidance and IP Guidance to provide better clarity, lessen the burden on grant recipients and simplify reporting requirements. Through this process, the requests were updated for clarification and to delete any questions identified as redundant or unnecessary.

ACF/ECD reviews and approves grant recipient CNRA and Implementation Plans and this is a stipulation before grant recipients can implement their home visiting services. After approval, ACF/ECD will continue to use the information to monitor grant recipients to ensure grant recipients are implementing their programs in the manner in which they have documented, and to inform ACF on technical areas that may require technical assistance.

3. Use of Improved Information Technology and Burden Reduction

Grant recipients will submit their CNRA and IP's via ACF's GrantSolutions platform, an on-line system that allows grant recipients to upload their plans. Federal Project Officers will review grant recipient plans for approval and to monitor grant recipient performance and identify areas to provide technical assistance.

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

As part of meeting the requirements of their cooperative agreements, Tribal MIECHV grant recipients must comply with the CNRA and IP requirement during Year 1 and submit a plan

that should feature planned activities to be carried out under the program in years 2-5 of their grants. The revised CNRA and IP Guidance will assist grant recipients in Year 1 activities.

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 (PRA) 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 January 14, 2025, Volume 90, Number 8, pages 3224-3225, and provided a sixty-day period for public comment. During the notice and comment period, 2 comments were received. Both support the efforts by ACF to simplify the guidance documents and reduce burden.

In addition to the standard comment periods required by the PRA, this information collection and the program it supports was also informed by broad engagement of tribal communities, including from listening sessions with current grant recipients, correspondence from home visiting associations, and technical assistance providers. Listening sessions were approved by OMB under OMB #0970-0531.

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 includes the average number of hours it takes a respondent to gather and then report information on the topics listed and is based on:

- Experience providing guidance and technical assistance support to previous grant recipients.
- Proposed revisions, which include streamlining and the reporting process and elimination of information that has been determined as not necessary.

Based on this, estimated time per response has been reduced.

To provide annual estimates, ACF/ECD has estimated the total number of respondents over the next three years to provide a total burden estimate. This is based on the following assumptions:

- Six new grant recipients in 2025
- No new grant recipients in 2026
- Twenty-one new grant recipients in 2027

This provides a total of 27 respondents over a three-year period. To provide an annual estimate, the total burden was calculated for three years and divided by 3 .

Information Collection Title	Total Number of Respondents (3 Years)	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours (3 Years)	Average Annual Burden Hours	Average Hourly Wage	Total Cost
Tribal MIECHV Community Needs & Readiness Assessment Guidance	27	1	450	12,150	4,050	\$45.28	\$183,384
Tribal MIECHV Implementation Plan Guidance	27	1	450	12,150	4,050	\$45.28	\$183,384
Estimated Annual Burden and Cost Totals:				24,300	8,100		\$366,768

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for 21-1093 (Social and Human Service Assistants), which is \$22.64 per hour. To account for fringe benefits and overhead, the rate is multiplied by two which is \$45.28.

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 fall into one category:

1. Cost of federal staff time for project oversight and development.

Type of Cost	Description of Services	Average Annual Cost
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5 Government Federal Project Officers (40%)	Project management and oversight, and consultation.	\$212,220
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Government costs include personnel costs for 4 federal project officers involved in Year 1 project oversight, which includes reviewing and approving grant recipient CNRA and implementation plans which the guidance supports and includes approximately 40% of 4 GS-13 Federal Project Officers. The average estimated annual cost is based on the assumptions provided regarding the estimated number of respondents each year in section A12.

15. Explanation for Program Changes or Adjustments

This request is for significant modifications the guidance, which reduces burden estimates compared to previous versions. These changes, implemented after a thorough and careful review, include eliminating redundant sections that overlap with other reporting requirements, a reduction in the number of guiding questions, facilitation of shorter responses, and the separation of the CNRA Guidance from the IP Guidance. This change enables the CNRA Guidance to serve as an independent document, allowing for greater clarity and usability, rather than being incorporated within the IP Guidance.

In addition to the reduction in estimated time per response, the number of respondents has been updated to reflect the current number of grant recipients.

16. Plans for Tabulation and Publication and Project Time Schedule

In the first year of their grants, recipients are required to develop a CNRA and IP 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 the MIECHV reauthorization, annual report to Congress.

Project Timeline

Activity	*Time Schedule
Distribute guidance to a planned new cohort of Tribal MIECHV Grant Recipients	7/1/2025
*The Tribal MIECHV CNRA and Implementation Plan Guidance will continue to be issued to new grant recipients on an annual schedule, as grants are awarded. Current estimates for number of awards is provided in section A12 and span 2025-2027.	

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

No exceptions are necessary for this information collection.