



The Honorable Dr. Laurie Todd-Smith
Deputy Assistant Secretary
Office of Early Childhood Development
Administration for Children and Families
330 C Street, SW
Washington, DC 20024

April 22, 2026

Dear Dr. Todd-Smith,

The Association of State and Tribal Home Visiting Initiatives (ASTHVI) 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 respond to the changes proposed in the Tribal Maternal, Infant, and Early Childhood Home Visiting (MIECHV) Program: Demographic and Service Utilization Data Report and Performance Measurement Data Report notice (OMB #0970-0614).

ASTHVI is the professional association of state and Tribal administrators of federal MIECHV funds. ASTHVI's Tribal Committee met to discuss the proposed changes to MIECHV reporting, and provided feedback to inform this response.

Agreement with Proposed Revisions

Our members wish to convey their support of ECD's continued efforts to reduce administrative burden on grantees. Grantees expressed no concerns with the removal of Quarterly Performance Reporting (QPR), the reduction of elements in the Demographic Service Utilization Report (DSUR), or the continued use of the Performance Measurement Report (PMR) as an annual performance tool.

Additional Recommendation on Postpartum Care Measure

As ECD works to update and streamline requirements, Tribal MIECHV grantees further recommend that ACF align its postpartum care measure with current clinical guidance regarding the timeline for postpartum visits. Obstetric providers typically have up to 12 weeks postpartum to conduct follow-up care, and HRSA has updated its reporting to reflect this timeframe. While programs often encourage earlier visits, ACF's current 8-week measure may create confusion for

families and challenges in coordination, data collection and reporting. Aligning the ACF measure with clinical practice would better support care delivery while still reinforcing timely screening.

Recommendations for Monthly Verbal Reporting

Recently, ACF has moved to replace some written quarterly reports with monthly verbal reporting. This change reduces the paperwork burden on Tribal MIECHV administrators while permitting ECD staff to identify potential issues such as dropping caseloads and provide timely technical assistance and support to the grantee. This change is welcomed and appreciated. Tribal Committee members also expressed concerns about sharing data that are potentially incomplete, as home visitors may not have finalized all documentation and some families' status may still be in transition, and concerns that semi-annual and annual reporting may not align with the informal monthly updates. Tribal Committee members recommend continued communication regarding expectations for the informal monthly data updates, how monthly information will be used, whether it will be formally documented or referenced later, and how it will be reconciled with DSUR and PMR reporting.

ASTHVI's Tribal Committee reiterates its support for ECD's efforts to streamline reporting and reduce administrative burden; our members appreciate the opportunity to provide these comments and look forward to providing additional clarifications if needed.

Sincerely,

Catriona Macdonald
Executive Director