# Tribal MIECHV Community Needs and Readiness Assessment and Implementation Plan Guidance Focus Groups

**Formative Data Collections for Program Support**

**0970 – 0531**

# Supporting Statement

# Part A - Justification

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Submitted By:
Office of Early Childhood Development
Administration for Children and Families
U.S. Department of Health and Human Services

4th Floor, Mary E. Switzer Building
330 C Street, SW
Washington, D.C. 20201

## A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval to conduct two virtual focus groups with Tribal Maternal, Infant, and Early Childhood Home Visiting (Tribal MIECHV) grant recipient teams to gather formative feedback on proposed revisions to the Community Needs and Readiness Assessment (CNRA) and Implementation Plan (IP) Guidance[1].

### *Background*

The MIECHV legislation requires grant recipients to conduct a needs assessment. For Tribal MIECHV grant recipients, this requirement is fulfilled through the CNRA, which supports program planning, design, and implementation. The CNRA is a foundational component that informs the development of the IP, which outlines how grant recipients will carry out home visiting services.

In 2024, consistent with Section 511(h)(6)(A)(iii) of Title V of the Social Security Act, which directs HHS to reduce administrative burden and consult with tribal entities, ACF undertook a comprehensive revision of the CNRA and IP guidance under OMB #: 0970-0611. These revisions were informed by engagement with Tribal MIECHV grant recipients, technical assistance providers, and stakeholders, including discussions focused on administrative burden, clarity of instructions, duplication across reporting requirements, and the overall usability of program guidance. Feedback from these efforts highlighted the need to streamline requirements, reduce duplication, and improve alignment across program planning and reporting processes.

As a result, ACF implemented significant changes to the CNRA and IP guidance, including reducing the number of required questions, eliminating duplicative sections, simplifying response expectations, and separating the CNRA from the IP guidance to improve clarity and usability. These revisions were designed to reduce burden and improve the feasibility of completing required program planning activities.

Following implementation of the revised guidance, ACF has continued to engage with grant recipients and program staff to understand how the updated CNRA and IP function in practice. Early feedback and internal discussions indicate that while improvements have been made, additional opportunities exist to further refine the guidance. These include addressing variability in how grant recipients interpret and respond to CNRA requirements, improving clarity in sections that may be overly open-ended, and ensuring that guidance consistently supports high-quality, actionable program planning.

Additional feedback suggests that external factors, such as the level of evaluation support available to grant recipients, may influence how guidance is implemented, making it important to better distinguish between challenges related to guidance design and those related to implementation supports. There is also emerging evidence that prior burden estimates may not fully reflect the range of experiences across grant recipients, indicating a need to reassess assumptions about burden and identify further opportunities for reduction.

[1] CNRA and IP Guidance are approved under OMB #: 0970-0611.

These factors make it clear there is a need to support continuous improvement of CNRA and IP guidance and to ensure that these tools effectively support Tribal MIECHV program planning and implementation. This information collection directly supports this work by soliciting targeted, experience-based feedback from grant recipients who have recently completed the CNRA and/or are in the process of developing or implementing their IP. The main goal is to identify opportunities to reduce administrative burden, improve clarity, and streamline guidance across the CNRA, IP, and associated planning components. Based on feedback, ACF will begin to draft revised versions that further streamline requirements, reduce burden, and improve clarity, while ensuring that the guidance remains responsive to the needs, priorities, and sovereignty of Tribal communities.

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

There are no legal or administrative requirements that necessitate this specific data collection. ACF is undertaking this collection at the discretion of the agency to inform program improvement.

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

The purpose of this information collection is to obtain targeted, experience-based feedback from Tribal MIECHV grant recipients to inform ongoing revisions to the CNRA and IP guidance. These focus groups are designed to identify opportunities to further reduce administrative burden, improve clarity, and enhance the usability of these program planning tools.

This data collection will consist of two virtual focus groups with Tribal MIECHV grant recipients. One focus group will include Development and Implementation Grant recipients who have recently completed both the CNRA and IP processes and will provide feedback on the alignment, clarity, and usability of both guidance documents. A second focus group will include grant recipients who have recently completed the CNRA and will provide more targeted feedback on CNRA-specific components, including planning requirements and data collection expectations. This approach allows ACF to gather detailed feedback from participants with different experiences using the guidance and to identify both shared and distinct challenges.

The information collected will be used by ACF to:

- Obtain feedback about processes, guidance, and practices to inform ACF program development and refinement of the CNRA and IP guidance.
- Plan for and improve the provision of programmatic technical assistance (TA) and tools to support Tribal MIECHV grant recipients in completing required program planning activities.
- Support the refinement of workflows and guidance related to CNRA and Implementation Plan development to reduce administrative burden and improve usability.

These uses directly support ACF's goal of reducing administrative burden and improving program implementation through iterative refinement of required guidance. Under the umbrella generic clearance for formative data collections for program support (0970-0531), this information is intended to support ACF program improvement activities. Findings will be used to inform specific updates to CNRA and IP guidance, as well as the development of TA

resources such as revised guidance documents, implementation tools, and supporting materials for grant recipients.

Findings may also be shared with internal and external partners, such as technical assistance providers (e.g., THRIVE) and Tribal Engagement Partners (TEP), to support interpretation of results and ensure that revisions to CNRA and Implementation Plan guidance reflect Tribal perspectives and program needs. In addition, findings may be incorporated into program support materials such as presentations and webinars for grant recipients, as well as technical assistance resources (e.g., guidance updates, tip sheets, or FAQs) designed to help current and future grant recipients understand and implement CNRA and IP requirements.

This information collection is formative in nature and is not intended to produce generalizable findings. In any dissemination of findings, ACF will describe the data collection methods and note limitations related to sample size and generalizability.

***Processes for Information Collection***

Information will be collected through two virtual focus group sessions with Tribal MIECHV grant recipients. Each session will be approximately 75 minutes in length and will use a semi-structured discussion guide tailored to the specific focus of the group. Two discussion guides have been developed: one focused on the CNRA and one focused on both the CNRA and IP guidance.

- The first focus group will include representatives from Development and Implementation Grant recipients who have recently completed both the CNRA and IP processes. This group will provide feedback on both the CNRA and IP guidance, including alignment between the two documents, clarity of instructions, and overall usability.
- The second focus group will include representatives from Tribal MIECHV grant recipients who have recently completed the CNRA. This group will provide more targeted feedback on CNRA-specific components, including planning requirements, data collection expectations, and areas of potential burden or confusion.

Participants will include up to two representatives per grant recipient, typically individuals most directly involved in completing the CNRA and/or IP, such as program managers, coordinators, or evaluators. Participation is voluntary.

The focus groups will be conducted using a secure, cloud-based virtual meeting platform. Participants will join using a password-protected link and will engage in facilitated discussion led by ACF staff and/or contractors. Participants will respond verbally to questions posed by the facilitator and may also provide input through chat within the virtual platform.

With participant consent, the sessions will be audio-recorded to support accurate capture of responses. In addition, facilitators will take notes during the discussion. Information collected may include verbal responses, chat inputs, and any polling results used during the session.

Following the sessions, ACF will review and synthesize the information collected to identify key themes and actionable feedback. Findings will be used for internal program improvement purposes, including informing revisions to CNRA and IP guidance and associated technical

assistance materials. Findings may also be incorporated into program support activities, such as technical assistance resources, presentations, or training materials for grant recipients.

### A3. Improved Information Technology to Reduce Burden

This information collection will use widely available and accessible technology to minimize burden on respondents. The focus groups will be conducted virtually using a secure, cloud-based video conferencing platform. Participants will receive a password-protected link via email to join the session, eliminating the need for travel and reducing time burden.

Participants will provide responses verbally during the session and may also use built-in features of the platform, such as chat, to provide input. No separate data submission or written response outside of the focus group session will be required.

With participant consent, sessions may be audio-recorded using the virtual platform to ensure accurate capture of responses. Facilitators may also take notes during the session.

All scheduling communications, including invitations and reminders, will be conducted via email. Any materials, such as discussion guides or background information, will be shared electronically in advance of the session.

The use of virtual technology reduces burden by allowing respondents to participate from their preferred location, minimizing time and resource commitments, and streamlining the data collection process.

### A4. Efforts to Identify Duplication

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

### A5. Involvement of Small Organizations

This information collection involves Tribal MIECHV grant recipients, which may include tribal organizations and agencies with limited staff and resources. ACF has taken steps to minimize burden on these entities.

Participation in this information collection is voluntary, and the number of respondents has been limited to the smallest number necessary to achieve the purpose of the collection. Focus groups will be scheduled at times convenient for participants, and the use of virtual technology eliminates the need for travel and reduces time burden.

The data collection is designed to be low burden, consisting of a single 75-minute session per participant, with no additional reporting or follow-up required. Participants will not be required to prepare written responses in advance or submit any materials outside of the focus group session.

These efforts are intended to minimize burden while still allowing ACF to obtain meaningful feedback to inform program improvement.

## 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 April 28, 2025, (90 FR 17603), 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 (90 FR 42248, in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice.

### *Consultation with Outside Experts*

No 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

We plan to host two virtual focus group sessions with Tribal MIECHV grant recipients. Up to two representatives from each of 12 grant recipients are expected to participate, for a total of 24 respondents across both focus groups.

Two focus group formats will be used. The CNRA-only focus group is estimated to last approximately 60 minutes (1 hour), and the CNRA and Implementation Plan (IP) focus group is

estimated to last approximately 75 minutes (1.25 hours). Each respondent will participate in one focus group session and provide one response.

The estimated time per response reflects the time required to participate in the focus group session, including listening to questions, providing responses, and engaging in group discussion. No additional time is required for preparation, follow-up, or submission of materials.

***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 2024, which is $22.64 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $45.28.

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 1A: CNRA Focus Group Discussion Guide | 12 | 1 | 1 | 12 | $45.28 | $543 |
| Instrument 1B: CNRA + IP Focus Group Discussion Guide | 12 | 1 | 1.25 | 15 | $45.28 | $679 |
| **Totals:** | **24** | **1** | **Avg: 1.125** | **27** | **$45.28** | **1,222** |

## 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 $1,000. This estimate includes Federal staff time for planning, coordinating, and facilitating the focus groups, as well as reviewing and synthesizing the information collected for program improvement purposes.

## 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 sessions are planned for June 2026, pending OMB approval. The results will be reviewed and synthesized by ACF staff and used to inform revisions to the CNRA and IP guidance. Findings will also be used to support program improvement activities, including the development of technical assistance resources, presentations, and training materials for grant

recipients. These revisions and materials are intended to support improved program planning and implementation for new Tribal MIECHV grant recipients expected to begin in July 2027.

### 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 1A: Tribal Home Visiting CNRA Focus Group Discussion Guide
- Instrument 1B: Tribal Home Visiting CNRA and Implementation Plan Focus Group Discussion Guide