



Ms. Cynthia Phillips
Acting Director, Division of Home Visiting and Early Childhood Services Maternal and Child
Health Bureau
Health Resources and Services Administration
Rockville, MD 20857

September 7, 2021

Dear Ms. Phillips,

The Association of State and Tribal Home Visiting Initiatives (ASTHVI) is a collaboration of administrators of home visiting funds dedicated to supporting the effective implementation and continuous quality improvement of home visiting programs. We are writing to respond to HRSA's submission of an Information Collection Request titled, *The Maternal, Infant, and Early Childhood Home Visiting Program Quarterly Data Collection, OMB Number: 0906-0016 – Revision*.

Over 35 members from around the country joined an ASTHVI Data Committee call to review the proposed changes to the MIECHV Quarterly Performance Report. The following comments address the two changes made to the definitions of key terms:

Table A.1: Program Capacity

Administrators expressed unanimous support for the updated definitions for this table. Replacing the gendered language in the current report with a definition that is more inclusive is a positive change.

Table A.2: Place-Based Services

While members recognize that clarification in this table is needed, administrators raised several concerns regarding the new definition for "counties and zip codes." The definition says that counties and zip codes should reflect the geographic distribution of households *served* during the quarterly reporting period. This would require a number of states to update their data reporting for this table, with many states currently reporting on the counties and zip codes that a LIA *can* serve during the reporting period. That distinction would increase the reporting burden, with household counties and zip codes served changing frequently across reporting periods. While states have county and zip

code data on file, it is often not in a format that is easy to pull from. Several administrators observed that information is pulled manually when needed.

Members also expressed curiosity regarding HRSA's interest in this particular data point. If states are ultimately required to report county and zip code data in this way, administrators would appreciate additional information regarding the use of this information at the federal level. ASTHVI members also suggest reporting county and zip code data on an annual rather than quarterly basis to reduce the burden.

Thank you for your attention to these comments. We look forward to working with you to improve health, child welfare, and early education outcomes for even more children across the county.

Sincerely,

Kasondra Branwen
ASTHVI Data Committee Co-Chair

Ginny Zawistowski
ASTHVI Data Committee Co-Chair