



Moushumi Beltangady
Program Manager
Administration for Children and Families
US Department of Health and Human Services
330 C St. SW, Washington DC 20201

June 2, 2021

Dear Ms. Beltangady,

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 in response to ACF's invitation to provide written comments in advance of the Tribal MIECHV listening session at the 2021 Virtual MIECHV All-Grantee meeting. Hosting a Tribal MIECHV listening session is greatly appreciated and we hope they will continue to be hosted on an annual basis. ASTHVI's Tribal Committee invited all Tribal MIECHV awardees to participate in a call to develop feedback in response to your invitation, and we are pleased to provide the summary below.

Distribution of emergency funding is on the minds of many Tribal awardees. ASTHVI understands that ACF plans to award American Rescue Plan Act (ARP) supplements no later than September 29, 2021, and will be in touch with grantees to discuss the application process and other next steps once the agency has received approval to proceed. Tribal grantees recognize these limitations, but expressed serious concerns about the anticipated application and spend down timelines. These concerns have been exacerbated by the compressed application process for state MIECHV ARP funding. Tribal awardees pointed out that, as you know, an extensive process of community consultation and consensus building may be needed to prepare for funding applications, and it is important that the funding availability announcement allow enough time for Tribes to undertake that process and still respond timely to application deadlines.

Accordingly, the Tribal Committee requests that ACF provide any and all possible additional information on ARP grants, even if the RFP is not yet available. In particular, it would help Tribal awardees be able to prepare if they had additional information on the following points:

- How much funding will be made available to Tribal grantees?
- Will there be one round of applications, or, like the state awards, will funds be divided into more than one round of applications?

- How much money will individual Tribal grantees be eligible to apply for? Will all Tribal awardees be eligible for grants of the same size, or will funding limits be determined by some other criteria?
- What activities and expenses are allowable under the emergency grants? Does ACF intend to take an expansive view of the funding, as HRSA did, to include not just emergency supplies and services but also expansion to serve additional children and families?

This list is not intended to be exhaustive, but highlights areas where additional guidance would be helpful for planning in advance of an official funding announcement.

Beyond questions and concerns about the ARP emergency funding, awardees expressed frustration at the evaluations that Tribal MIECHV programs are required to undertake. These evaluations, combined with the important but often cumbersome MIECHV data requirements, can strain program capacity and compete for time and resources with quality initiatives, innovations or expansion. This is a particular challenge for Tribal grantees that lack the extensive data teams and supports enjoyed by state MIECHV awardees.

The data collection, research, evaluation, and CQI required under MIECHV is extensive, and represents a disproportionate percentage of program costs for smaller programs. These activities necessitate the funding of appropriate levels of infrastructure, the cost of which is also disproportionately higher for smaller grants. While not feasible with current grant amounts, Tribal administrators expressed interest in bringing in data teams to improve the quality of data collection and reporting and significantly reduce the administrative burden currently placed on home visitors. In the words of one administrator, “Our forte is serving our community, and we’re not able to pay attention to serving our community when we have to split ourselves in half constantly to serve all these [funders’ requirements].”

Administrators also shared frustrations about the expectations for home visiting evaluations in Tribal communities. As you are aware, random control trials in which a portion of the community is denied services are extremely troubling to many Tribal members, and are not culturally appropriate in many communities. Subsequently, Tribal grantees often find it difficult to engage in some research activities. Awardees appreciate the efforts undertaken by the MUSE process to address research burdens in home visiting, but are frustrated by the lack of Tribal input that was accepted in modifying the MUSE research questions, goals and process and the requirement to opt in (or opt out) of MUSE participation before the research parameters had been established. Grantees feel that many evaluation requirements are excessive or unworkable in a Tribal context. Administrators would appreciate the opportunity to talk with the HHS staff who set evaluation requirements for Tribal MIECHV programs to communicate the burden of evaluation obligations on Tribal MIECHV programs and discuss potential solutions.

Looking ahead to the AGM, Tribal awardees raised questions about program equity for states and Tribes. There is often little interaction between these two elements of the MIECHV program at these national meetings, which limits the potential for collaboration and innovation across the broader home visiting field. Administrators appreciate the additional flexibilities that Tribal awardees have been granted in recognition of Tribal sovereignty and other unique aspects of implementing programs in Tribal communities. However, Tribal awardees have a sense that state MIECHV programs engage in more frequent conversations with federal regulators and would like to feel that they are kept more up to date on program developments and policy.

In recent weeks, ASTHVI has responded to HRSA's request for comment on proposed changes to MIECHV Forms 1 and 2 for state awardees. Does ACF also plan to update Forms 1 and 2 for Tribal MIECHV? If so, when would those changes go into effect? Tribal administrators are grateful for any information ACF can offer to help programs prepare. Administrators also encourage ACF to consider the updated state forms when making any changes. Like state awardees, Tribal grantees must work with model developers to incorporate any changes into model data systems. Models are understandably more responsive to updates when they align with state data collection practices.

Thank you for the invitation to share feedback in advance of the Tribal listening session and for your attention to these comments. ASTHVI looks forward to continuing to work with you to improve health, child welfare, and early education outcomes in Tribal communities across the country.

Sincerely,

Catriona Macdonald
ASTHVI Executive Director