



Mary B. Jones  
ACF/OPRE Certifying Officer  
Administration for Children and Families  
Office of Planning, Research and Evaluation (OPRE) 330 C Street SW  
Washington, D.C. 20201

March 4, 2022

Dear Ms. Jones,

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 the Administration for Children and Families' invitation to provide comments concerning proposed changes to existing Form 1: Demographic and Service Utilization. ASTHVI's Tribal Committee, comprised of administrators of Tribal Maternal, Infant, and Early Childhood Home Visiting (TMIECHV) grants, met to discuss this notice and share their thoughts and recommendations.

Before addressing the proposed changes, ASTHVI would like to express its gratitude to ACF for consistently engaging Tribal administrators in conversations about the changes to the TMIECHV data collection and performance measures. Our administrators appreciate the collaboration that has developed with ACF and are grateful for the opportunity to offer feedback on these potential revisions. ASTHVI believes the clarification of the definitions proposed in this notice will be helpful in standardizing data collection across TMIECHV grantees, and appreciates ACF's efforts to ensure consistency.

Data collection, analysis, and reporting represents a significant administrative burden throughout MIECHV. As smaller programs, with more limited budgets and administrative resources, it is disproportionately time-consuming and costly to Tribal MIECHV grantees. The cost of data collection and reporting is not limited to budgets and bottom lines; it is felt throughout the program, by families and home visitors as well as by administrators. In a home visit, as much as 50% of a home visitor's time with a family may be consumed by data generation and data entry, sometimes interfering with the development of the relationship between the family and the home visitor. The need to capture required data can sidetrack conversations away from the issues in which families are most interested and most desirous of

support, and can get in the way of home visitors' ability to cover all of the curriculum required for implementation with fidelity to an evidence-based model in the time allotted for home visits. It has been widely reported that the burden of data collection, entry and reporting contributes to home visitor burnout and turnover, as staff who entered the field for the purpose of delivering services to families find significant portions of their workload dedicated instead to data entry. Frequently, applicants accustomed to budgeting norms in other federally-funded programs underestimate the financial cost of, and FTE needed for, TMIECHV data collection, analysis and reporting. This results in insufficient funds and personnel for data activities, increasing the burden and exacerbating frustration, burnout, and costs.

ASTHVI appreciates that the primary purpose of the proposed revisions to Form 1 is to add a virtual home visiting data collection field and revise terms and definitions in an effort to streamline reporting. The Tribal Committee applauds efforts to make reporting less burdensome, but is uncertain that these revisions will make significant progress towards that goal. Overall, Tribal Committee members remain concerned about the overwhelming data burden that Form 1 presents to Tribal administrators in its current form, and are skeptical that term and definition revisions, alongside an additional data collection field, will prove impactful in reducing the cost - to families, home visitors, and programs - of these reporting obligations.

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 country.

Sincerely,

*Catriona Macdonald*

Catriona Macdonald  
Executive Director