



Katie Hamm

Deputy Assistant Secretary for Early Childhood Development Administration  
Administration for Children and Families  
U.S. Department of Health and Human Services  
330 C St SW, Washington, DC 20201

April 4, 2022

Dear Assistant Secretary Hamm,

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 comment on its Request for Information: Technical Assistance Needs and Priorities on Implementation and Coordination of Early Childhood Development Programs in American Indian and Alaska Native Communities. ASTHVI's Tribal Committee, comprised of administrators of Tribal Maternal, Infant, and Early Childhood Home Visiting (TMIECHV) grants, provided answers to the technical assistance questions posed in this request for information.

Tribal Committee members believe technical assistance (TA) is generally greatly needed for home visiting in Tribal Communities. As you know, Tribal MIECHV grants are much smaller than the grants that are awarded to states. Therefore, the administrative burden of meeting Tribal MIECHV requirements is proportionally greater, but Tribal awardees typically have proportionally fewer administrative staff to help support data collection, data quality, evaluation, and other activities associated with the grant. In many cases, applicants familiar with administering other programs and funding streams may not be aware of the significant administrative burden associated with Tribal MIECHV grants, and may under-budget for those responsibilities. Guidance to applicants, even before they submit their proposals, to help them appropriately budget, staff and plan for Tribal MIECHV programs would be helpful in setting up applicants for success.

Technical assistance may be helpful to relatively new Tribal awardees in developing systems for effective fiscal and administrative management of early childhood programs and grants, or those experiencing significant staff turnover. However, some grantees with significant experience managing Tribal MIECHV grants felt that the TA support actually increased the administrative burden, and suggested that some TA resources currently dedicated to grants

administration could be re-deployed to support Tribes in the following areas of early childhood programs and systems:

- Promoting development of language skills in early childhood, especially for children whose parents do not speak the language of instruction
- Implementation of health and nutrition services, particularly when such services are not readily available in the community
- Support for outreach and recruitment in order to effectively engage families, elders, and community members and promote family leadership
- Building, training, and retaining an effective early childhood workforce
- Gathering and utilizing community data
- Implementation of continuous quality improvement and evaluation initiatives
- Securing financial support to develop and maintain appropriate education facilities and licensing programs for early childhood services

ASTHVI members also observed that in some cases, the greatest barrier to building their early childhood system is not lack of technical assistance, but rather lack of resources to implement needed initiatives. Tribal Committee members pointed to developing and maintaining appropriate facilities; implementing licensing systems; and direct CQI and evaluation support as examples where Tribes need *funding*, rather than consultation or guidance, for progress to be made.

Thank you for requesting input to guide future TA plans, and for your attention to these comments. We look forward to working with you to support early childhood systems in Tribal communities across the country.

Sincerely,

*Catriona Macdonald*

Catriona Macdonald  
Executive Director