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

September 19, 2022

Dear Deputy 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.

ASTHVI's Tribal Committee met recently to discuss the *Proposed Information Collection Activity; Tribal Maternal, Infant, and Early Childhood Home Visiting Program Form 2: Grantee Performance Measures*. Tribal Committee members believe that ACF's efforts to gather crucial data about Tribal home visiting programs across the country is important and essential to administering MIECHV. As you know, Tribal MIECHV grants are much smaller than the grants that are awarded to states, and the administrative burden of meeting Tribal MIECHV requirements is proportionally greater. Most Tribes have proportionally fewer staff to assist with reporting associated with MIECHV grants.

When asked if the new proposed annual burden of 500 hours for each respondent was an accurate reflection of the work required for Form 2 reporting, most attendees disagreed. Although this is a significant increase from previous estimates, Tribal Committee members feel that this estimate does not account for the countless hours put in by staff whose salaries are not paid by MIECHV to complete this report—hours that grantees may not even be able to track or count themselves. Staff supported by MIECHV funds carry out work including capturing missing data, organizing, compiling, carrying out quality control on, and analyzing data, and completing forms. Many Tribal agencies require multiple levels of edits and approvals to submit

a report to ACF, which is an additional burden associated with Form 2 that is difficult or impossible for awardees to measure.

Even awardees who agreed that 500 hours a year was a fair estimate pointed out that 500 hours represents nearly 25% of just one staff person's annual FTE for this single form. A 500 hour burden means that staff spend, on average, 10 hours a week (and, awardees suggest, that estimate is the low end of the range) just working on Form 2. Tribal Committee members would like to take this opportunity to reiterate their belief that a better balance is needed between gathering the crucial information the agency needs to best serve families and children, and knowing when the burden of collecting information outweighs the value of what is collected. Tribal MIECHV awardees would welcome the opportunity to work with federal administrators to consider ways to streamline collection of useful, meaningful and usable information.

Tribal Committee members continue to believe that while some data reporting is essential, it would be helpful to analyze the percentage of the relatively small Tribal MIECHV awards dedicated to reporting and administrative costs. This would provide information that would inform ACF in striking an improved balance between data collection and responding to other programmatic demands.

Thank you for your attention to these comments and for the opportunity to share our thoughts on the proposed changes to Form 2. 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