



Ms. Maria Button, Director
Executive Secretariat, Office of Operations
Health Resources and Services Administration
Rockville, MD 20857

Implement Maternal, Infant, and Early Childhood Home Visiting Program 2022 Legislative Changes: Assessment of Administrative Burden, OMB No. 0906– xxxx—[New].

January 26, 2024

Dear Ms. Button,

The Association of State and Tribal Home Visiting Initiatives (ASTHVI) appreciates the opportunity to comment on the proposed survey of home visiting administrators to capture recommendations for meeting the statutory requirement to reduce the administrative burden of managing Maternal, Infant, and Early Childhood Home Visiting (MIECHV) funds by 15%. We appreciate the opportunity to provide feedback on the survey proposal, and look forward to working with the Health Resources and Services Administration and the Administration for Children and Families to reduce the administrative burden on state and Tribal staff, and free them up for activities that more directly support local programs and families.

ASTHVI members understand that, in the short run, the work of identifying administrative activities for greater efficiency will increase, rather than decrease, administrative burden. We appreciate the willingness to survey administrators and gather input directly from them, and believe that this feedback is critically important. However, consistent with ASTHVI's feedback in response to other Federal Register notices with time estimates for other administrative activities, we believe it is also important that the estimates accurately capture the expected time needed for completion.

It is entirely possible that the survey can be completed in 1.25 hours by a state or Tribal administrator who has all the information needed in front of him or her. However, most grants

are administered by teams of people that pull in the resources of accounting/fiscal staff, data and/or evaluation staff, or other full or part time contributors to program administration and oversight. Responding completely to all the questions likely requires some discussion and input from more than one team member. Further, very few staff have the authority to complete and submit the survey without review and approval by at least one other person in their agency or office. ASTHVI members who have looked at the announcement suggest that even if the survey can be completed by one person within 1.25 hours, the time needed to walk through the survey with a group, collect information, and receive approvals would increase the time needed to an average of approximately 10 hours.

We appreciate HRSA and ACF's continued partnership and look forward to working with both agencies to support home visiting administrators and reduce administrative burden.

Sincerely,

Catriona Macdonald

Catriona Macdonald
Executive Director