



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].*

February 20, 2024

Dear Ms. Button,

The Association of State and Tribal Home Visiting Initiatives (ASTHVI) appreciates the opportunity to respond to the Administration for Children and Families' efforts to reduce the administrative burden associated with Tribal Maternal, Infant, and Early Childhood Home Visiting (MIECHV) funds, including reviewing and responding to the proposed survey of Tribal MIECHV grantees.

Unfortunately, ASTHVI's Tribal members were unable to review the proposed survey. Ironically, several commented that they were prevented from doing so by the need to attend to pressing tasks associated with administering their T-MIECHV grants, particularly the obligations of the Community Resources and Needs Assessment (CRNA) process. As you are aware, many T-MIECHV awardees have only one or two staff who are responsible for overseeing their home visiting program, reviewing and submitting data, and completing all required forms and reports. ASTHVI's Tribal Committee did discuss the survey in its February 20 meeting, but attendees were unable to review the survey in advance of the deadline for responding to the Federal Register notice.

We are concerned that the same obstacles that prevented Tribal MIECHV awardees from reviewing and commenting in detail on the proposed survey will likely stand in the way of timely

and complete responses to the survey once it is issued. It is possible that additional approaches to soliciting and receiving feedback on administrative burden from T-MIECHV grantees may need to be developed and implemented to glean a complete and helpful picture of the administrative burden on Tribal administrators. ASTHVI members look forward to working with you to develop and execute strategies that will assist in achieving this goal.

Beyond the details of the survey, Tribal administrators would like to offer the following thoughts on Tribal MIECHV reporting requirements.

In our committee discussion, grantees cited examples of ACF's current efforts to reduce the paperwork burden faced by T-MIECHV administrators, even before the survey was disseminated. In particular, the discontinuation of period performance reports and reliance on the annual report, and the streamlining of Form 4, are much appreciated.

Tribal administrators shared their frustration at the timing of major deliverables and the perceived lack of flexibility in reporting timelines. Currently, for example, the due date for the CRNA requires a community assessment and engagement with Tribal Elders and other community members during the winter rest season and at a time when the weather can make community gatherings difficult or impossible. These challenges were exacerbated by the timing of the mandatory Tribal Home Visiting grantee meeting in Baltimore in December, which required grant administrators to travel and be out of the office for a week in the middle of conducting the assessment. T-MIECHV grantees suggested that due dates for major reports could be more culturally sensitive; requirements could be better sequenced; and flexibility in due dates could be offered to better accommodate disruptions due to weather, holidays, illnesses or family obligations that deplete already-limited staff resources.

Tribal administrators also observed that a meaningful portion of the information they report is duplicative. In some cases, information is contained in the grant application but then must be repeated in operational plans. In other cases, updates are provided to project officers through regular check-ins but then have to be repeated in other formats. Frequently, information that has already been submitted must be slightly re-written or reorganized to be responsive, requiring additional time to reconfigure information that has already been provided in other reports or documents. The slight adjustment of duplicative information does not feel like an impactful use of time on the part of staff who are already stretched to oversee their programs and respond to federal grant requirements.

T-MIECHV grantees also question how some requested information is used, and whether all of the information called for is really needed or used by ACF. For example, leadership at Tribal partner organizations can change, and some partner leaders are reluctant to have their names,

email addresses and phone numbers included in documents submitted to the federal government. If ACF plans to contact Tribal MIECHV partners, current names and contact information could be provided at the time by the T-MIECHV administrator.

Tribal MIECHV grantees appreciate the opportunity to share information that can result in the reduction of administrative burden of administering T-MIECHV grants, and regret that the burden of administering their grants prevented them from reviewing the proposed survey. ASTHVI and its Tribal Committee appreciate the continued partnership with ACF and look forward to working with you to support Tribal home visiting administrators and reduce administrative burden.

Sincerely,

*Catriona Macdonald*

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Executive Director