



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

*Agency Information Collection Activities: Proposed Collection: Public Comment Request;
Information Collection Request Title: The Maternal, Infant, and Early Childhood Home Visiting
Program Statewide Needs Assessment Update*

July 22, 2024

Dear Ms. Button,

The Association of State and Tribal Home Visiting Initiatives (ASTHVI) appreciates the opportunity to comment on the next update of the needs assessment under the Maternal, Infant, and Early Childhood Home Visiting (MIECHV) program. ASTHVI understands there are no changes proposed in this next needs assessment update, and that HRSA is seeking comment on the administrative burden on states and Tribes wishing to update their assessment. However, ASTHVI members would like to offer feedback on the assessment's content and highlight opportunities for further improvement in service of families in at-risk communities.

State administrators believe that the structure and rushed nature of the report's submission timeline does not allow adequate time for reflection and analysis given the complexity of determining which communities are truly "in need." Many counties that are impoverished simply do not meet the determined threshold; other counties that perhaps have improved and risen above the thresholds are, in many ways, being penalized for doing so, as their services are subsequently revoked.

Administrators have also shared examples of communities in need identified based on indicators that are not considered by the assessment, and their inability to designate

communities with legitimate need because of the limitations of the criteria outlined in the assessment. For example, the criteria create difficulties serving populations experiencing homelessness, who are unable to stay in the same geographic area long-term. These challenges are compounded by the rush to submit the needs assessment update—this last round was due the same month it was released—which left little time for states to do more than the bare minimum of analysis. The lack of flexibility and rushed nature of the needs assessment unintentionally contributes to inequities in provision of services.

ASTHVI members strongly recommend the immediate addition of a provision permitting continued services in a community if a needs assessment update finds that community to be marginally above the threshold. Every geographic area has some level of need, and allowance should be made for the needs assessment to reflect this fact. ASTHVI members additionally believe it imperative that a method of demonstrating need outside of a data threshold, and measuring genuine community engagement, be quantified and implemented as soon as feasible into the needs assessment, perhaps through additional opportunities for comment or listening sessions. Equity means something different to every grantee, and the needs assessment could be more equitable with more flexibility on what to emphasize and explore within the report.

ASTHVI shares HRSA's understanding that the needs assessment is a critical and foundational resource providing essential information to state and Tribal administrators in identifying and serving families in need. We appreciate the opportunity to share the feedback that ASTHVI members provided, in the spirit of improving this assessment and ensuring it continues to serve all families in need.

Sincerely,

Catriona Macdonald

Catriona Macdonald, Executive Director