



All children will develop, learn and grow to realize their full potential.

May 14, 2021

To whom it may concern:

On behalf of Parents as Teachers National Center (PATNC), thank you for the opportunity to provide feedback on the proposed revisions to the Maternal, Infant, and Early Childhood Home Visiting Program (MIECHV) Performance Measurement Information System (PMIS), OMB No. 0906–0017, Revision posted on Monday, April 19, 2021.

Parents as Teachers (PAT) is an evidence-based Maternal, Infant, and Early Childhood Home Visiting model that offers culturally competent care with a focus on families during pregnancy and the early years. PAT provides parents and other adults in the home with tools to help whole families thrive, with an emphasis on maternal and infant health and development. Our home visiting model operates in all 50 states and more than 110 tribal communities. Half our programs are in rural areas. As members of the communities they serve, PAT home visitors bring a critical understanding of how a family's culture and values impact parenting and health practices. As you know, PAT has met Health and Human Services criteria for evidence of effectiveness and is thus an approved model for implementation of the Maternal, Infant, and Early Childhood Home Visiting program (MIECHV).

PATNC appreciates HRSA's review and consideration of prior feedback shared on the proposed revisions to the MIECHV PMIS, OMB No. 0906–0017. Based on the most recent revisions, we recommend adding clarification to support states with collecting information on substance use screening and referrals within Form 2.

As it is written, proposed optional performance measure 1 states: "Percent of primary caregivers enrolled in home visiting who are screened for unhealthy alcohol use, nonmedical prescription drug use, and illicit drug use using a validated tool within 6 months of enrollment." Because screening must be done on three categories of substances (alcohol, nonmedical prescription drugs, illicit drugs), clarification is needed about the number of tools intended to be utilized in the screening. States may need to use multiple tools to be able to assess all substances, as most tools are only designed to assess for one substance (e.g., AUDIT assesses for alcohol use). Additionally, PATNC seeks clarification about whether a list of validated and approved tools for screening will be provided to states, and to what degree this performance measure is optional (i.e., is it optional to do the substance use screening, optional to report it to HRSA on Form 2, and/or optional for demonstrating improvement).

Thank you for providing the opportunity to provide input on the proposed changes to the PMIS. We look forward to further clarity and revisions to this proposal. Please feel free to contact me directly at Allison.Kemner@parentsasteachers.org with any questions.

Sincerely,

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Vice President, Research and Quality

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