



ASSOCIATION OF STATE AND TRIBAL HOME VISITING INITIATIVES

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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

March 29, 2023

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 invitation to offer public comments on the Tribal Maternal, Infant, and Early Childhood Home Visiting Program Implementation Plan Guidance for Development and Implementation and Implementation and Expansion Grantees. ASTHVI's Tribal Committee, which is comprised of administrators of Tribal MIECHV grants, met to discuss the updated administrative burden estimate associated with this application, as well as recommendations for how funding applications are managed and improvements that could be made to ensure an efficient process for all potential Tribal grantees.

Tribal grantees are grateful for the doubling of the Tribal set-aside included in the passage of the Jackie Walorski Maternal and Child Home Visiting Reauthorization Act. This funding will undoubtedly impact home visiting in some of the most vulnerable areas of the country and fund Tribal-led efforts to support families and children in communities across the nation. With this increase in funds and expansion of the number of grantees, from thirty-five to as many as one hundred, communities navigating this funding for the first time will certainly require additional support and technical assistance. Though the application for funding has already been announced with a deadline expanded from one month to three months, Tribal Committee members believe that for future opportunities, additional time would be extremely helpful to new applicants—especially smaller Tribes with limited capacity.

For all Tribal applicants, new and returning, additional technical assistance for future opportunities would be appreciated and heavily utilized by grantees. For new applicants in particular, ASTHVI Tribal Committee members believe that the administrative burden associated with completing this application is more than double what ACF has estimated; our members believe 2500 hours is a more accurate representation of time spent on this

application. Multiple ASTHVI members recalled spending a full 6 months working alongside additional staff, focused full-time on preparing their first application.

For returning grantees, Tribal Committee members agreed with ACF's estimate of 1000 hours, as that has been the experience of returning applicants in the past.

Thank you for the opportunity to share these recommendations. We look forward to continuing to work with you to support early childhood systems in Tribal communities across the country.

Sincerely,

Catriona Macdonald

Catriona Macdonald
Executive Director