

February 5, 2024

Carole Johnson

Administrator

Health Resources and Services Administration

U.S. Department of Health and Human Services

5600 Fishers Lane | Rockville, MD | 20857

Re: Proposed Information Collection Activity: Home Visiting Assessment of Implementation Quality Study: Exploring Family Voice and Leadership in Home Visiting

Dear Administrator Johnson,

The National Service Office (NSO) for Nurse-Family Partnership® (NFP) and Child First appreciates the opportunity to respond to the Health Resources and Services Administration's (the Department's) proposed study to examine specific components of the Home Visiting Implementation Quality Study to inform strategies for implementing high quality home visiting programs (88 FR 84339, published 12/5/2023). The NSO shares the Department's commitment to understanding and supporting families in leadership opportunities to inform and improve programs. As model developers we are dedicated to continuously studying how our models can inform the development of more responsive Home Visiting systems and more equitable health and family support services. We are committed to understanding families' experiences within home visiting and strategies our programs have used to address disparities in their work with families. Understanding how programs engage families and identifying "actionable strategies that MIECHV awardees and LIAs could take to engage families meaningfully and effectively in program decisions and to ensure that families' unique strengths, needs, cultures, and preferences drive service delivery" is critical for our health equity work. The NSO has reviewed the proposed study instruments and makes the following recommendations.

The NSO believes that the stated burden is an underestimation. Focus group participants should be given the opportunity to discuss these questions in advance with colleagues who may not participate in the focus group. In fact, that collaborative approach should be encouraged for fuller input. The interview may be one hour, but the preparation time would be at least 1-2 more hours per participant. The time to review, consider and decide to participate, and respond with the requested data should also be considered when estimating burden. LIA participation will involve more time and steps than stated in the documents. Organizations may have internal review processes to determine if participation in the study is safe, ethical and follows organizational procedures, like our NSO Research and Publications Communications Committee (RAPComm). Time accounted for these internal processes is not mentioned here or anywhere else in the document. We estimate this would be about 5-10 hours (if there are multiple people on an internal committee and each of them will need about an hour to review and discuss).

Introduction and Consent: When introducing this work, we recommend that the Department include evaluation questions in the introduction. In addition, the analytical methods being used should be presented in plain language.

When stating that the interview is not evaluating performance, we also recommend that the Department state that the interview is based on immediate memory of experiences. The protocol should include giving the instrument to interviewees in advance so that they can consider their responses. We also recommend that the Department explicitly add that participation in the interview will not affect employment, *or current or future grant status*.

Thank you for your consideration of these comments and your continued work to bring quality programs to families in need.

Regards,



Charlotte Min-Harris
President and CEO
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