



# The Navajo Nation **DR. BUU NYGREN** *PRESIDENT*

**Yideeskáadi Nitsáhákees** | *Think for the Future*

*Transmitted via email:* [infocollection@acf.hhs.gov](mailto:infocollection@acf.hhs.gov)

March 17, 2025

Mary C. Jones, ACF/OPRE Certifying Officer  
Office of Early Childhood Development  
Administration for Children and Families  
U.S. Department of Health and Human Services  
200 Independence Ave. SW  
Washington, DC 20201

**Re: Proposed Information Collection Activity; Tribal Maternal, Infant, and Early Childhood Home Visiting (MIECHV) Program Community Needs and Readiness Assessment Guidance and Implementation Plan Guidance**

Dear Certifying Officer Jones,

On behalf of the Navajo Nation ("**Nation**"), I appreciate the opportunity to submit written comments regarding the federal registry notice published on January 14, 2025. This notice concerns the proposed revisions and the potential three-year extension of approval for the Tribal Maternal, Infant, and Early Childhood Home Visiting Program Community Needs and Readiness Assessment ("**CNRA**") Guidance and Implementation Plan Guidance ("**IPG**") (Office of Management and Budget (**OMB**) #: 0970-0611; expiration June 30, 2026). These programs, administered by the Office of Early Childhood Development ("**ECD**") within the Administration for Children and Families ("**ACF**") under the Department of Health and Human Services ("**HHS**"), play a critical role in supporting the well-being of tribal children and families. The Navajo Nation strongly supports these efforts, as they directly impact the health and future of our children.

## **Background on the Navajo Nation**

The Nation is the largest land-based tribe in the United States, covering more than 27,000 square miles, an area slightly larger than West Virginia, with parts of Arizona, New Mexico, and Utah spanning across the Nation. With a population of over 400,000 enrolled members, approximately half reside on the Nation. The federal government has a long-standing obligation to provide healthcare, education, and other essential services to the Navajo people consistent with the Treaty of 1868. Programs such as those developed by the ECD are essential in fulfilling these commitments, particularly when it comes to ensuring the health and development of Navajo children. Therefore, the Nation is eager to provide input on the proposed revisions and extension of the CNRA Guidance and IPG.

## **Support for the Proposed Revisions**

The Nation supports the proposed revisions to the CNRA and IPG, particularly the effort to better distinguish the two components and reduce administrative burdens. Separating the CNRA from the IPG will enable tribal programs to better assess their organizational capacity, readiness, and

implementation strategies for home visiting programs. This distinction is crucial, as it allows tribes to focus on evaluating their needs without simultaneously having to navigate the complexities of an implementation plan.

For instance, the Navajo Treatment Center for Children and Their Families (“NTCCF”) provides essential outpatient and therapeutic services for Navajo children and families affected by trauma. Under the revised framework, NTCCF would be better positioned to assess its current functions, streamline processes, and focus on treatment delivery rather than being weighed down by administrative redundancies. Additionally, the separation of the CNRA from the IPG would allow NTCCF to identify programmatic needs more effectively, facilitating the development of a robust and culturally relevant Home Visiting Program. These revisions would also empower NTCCF to leverage partnerships and enhance service delivery, ensuring greater efficiency and improved outcomes for families in need.

### **Support for the Three-Year Extension**

The Nation also supports the proposed three-year extension of approval for the CNRA and IPG. Extending the approval period will provide tribal programs nationwide with the necessary time to align their assessments and implementation plans thoughtfully. A longer timeframe allows for deeper reflection on program effectiveness and enables tribes to refine their approaches based on real-world experience and evolving community needs. For example, NTCCF has made significant advancements in integrating traditional and cultural healing practices into its services. This progress was only possible through time and careful evaluation of client needs, highlighting the importance of providing programs with sufficient opportunity to develop evidence-based, culturally responsive approaches. By extending the approval period, tribal programs can strengthen their capacity to implement sustainable and effective home visiting initiatives that align with both community needs and federal requirements.

### **Conclusion**

The Nation strongly supports the proposed revisions and the three-year extension of the CNRA Guidance and IPG. These changes will enhance tribal programs’ ability to assess, plan, and implement home visiting services in a way that reduces administrative burdens while ensuring high-quality, culturally appropriate care for children and families. We appreciate the opportunity to provide these comments and look forward to continued collaboration with ACF to advance the health, safety, and well-being of our children. Should you or your staff have any questions, please contact Mr. Thomas Cody, Executive Director of the Navajo Division of Children and Family Services at (928) 871-6851 or via email at [Thomas.cody@ndcfs.org](mailto:Thomas.cody@ndcfs.org). You may also contact Mr. Justin C. Ahasteen, Executive Director of the Navajo Nation Washington Office at [jahasteen@nnwo.org](mailto:jahasteen@nnwo.org) or call (202) 682-7390. *Ahéhee’* (thank you).

Respectfully,

A handwritten signature in blue ink, appearing to read 'B. Nygren', with a long horizontal line extending to the right.

Buu Nygren, *President*  
**THE NAVAJO NATION**