



March 17, 2025

Submitted via email

Mary C. Jones
ACF/OPRE Certifying Officer
Department of Health and Human Services
infocollection@acf.hhs.gov

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 (OMB # 0970-0611)

Dear Ms. Jones,

On behalf of the Port Gamble S'Klallam Tribe, I write in response to the Administration for Children and Families (ACF), Office of Early Child Development (ECD) request for comments regarding proposed revisions to the Community Needs and Readiness Assessment (CNRA) Guidance and Implementation Plan Guidance (IPG) applicable to Tribal Maternal, Infant, and Early Childhood Home Visiting (MIECHV) grant recipients.

The Port Gamble S'Klallam Tribe is a sovereign nation of over 1,342 citizens located on the tip of the Kitsap Peninsula in Northwest Washington State. In our language, "S'Klallam" means "the Strong People," and despite having been displaced from our ancestral homelands and faced with challenges that threatened our way of life, our Tribe has survived, and thrived, because of the strength, determination, and wisdom of our ancestors. Those ancestors taught us that there is no resource that is more important to our future than our children.

Approximately two-thirds of our members live on our Reservation. The Tribe also provides services to approximately 800 other American Indians, Alaska Natives, and non-Indians living on the Reservation.

In 2023, the Tribe was awarded a five-year MIECHV grant to support its Together for Children (TFC) program. TFC provides culturally-responsive support for tribal families

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expecting or raising young children. Through TFC's home visiting program, staff provide resources to families to foster child development, parent involvement, and strong parent-child bonds.

While TFC maintains a distinct program within the Tribe's Child and Family Services Department, its collaborative relationships with other Tribal programs – such as the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and Kinship Care Program – allow the Tribe to offer comprehensive prenatal and early childhood services to the community. TFC also works with the Tribe's Child Welfare Department to direct preventative care services to at-risk families, helping to reduce the number of dependency cases and out-of-home placements involving young children.

As a condition of its MIECHV grant, TFC must conduct an annual CNR assessment and must prepare an implementation plan in accordance with Administration for Children and Family guidance. In TFC's experience, the current guidance's data collection requirements are unduly burdensome and do not align with TFC's unique program structure and objectives. We strongly support ACF's proposal to reduce the burden on grant recipients under the current guidance, specifically by eliminating redundant sections that overlap with other reporting requirements, reducing the number of guiding questions, and allowing for shorter responses.

Thank you in advance for your consideration of this comment. If we can be of any further assistance as you evaluate these proposed revisions, please contact Cheryl Miller at cmiller@pgst.nsn.us or (360)-297-9665.

Sincerely,

A handwritten signature in black ink that reads "Amber Caldera". The signature is fluid and cursive, with the first name "Amber" and last name "Caldera" clearly distinguishable.

Amber Caldera
Chairwoman