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U.S. Department of Health and Human
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Dear Dr. Heppel and Dr. Lombardi:

We write to submit additional suggestions regarding the implementation of the Maternal, Infant, and Early Childhood Home Visiting Program (“Home Visiting Program”). We appreciate your interest in considering our supplemental suggestions with respect to the following issues:

I. GUIDANCE REGARDING THE CRITERIA OF EFFECTIVENESS AND CLASSIFICATION OF PROGRAM MODELS BY OUTCOMES

The Home Visiting Program requires the Secretary to establish criteria for the evidence of effectiveness of the service delivery models in a transparent manner that allows for public input. Because no uniform definitions currently exist regarding the meaning of “well-designed and rigorous randomized controlled research designs,” “well-designed and rigorous quasi-experimental research designs” or promising programs, and other critical elements of the Program, defining these terms and setting forth the criteria with which to determine effectiveness for these categories of programs is essential in our view, to the successful implementation of the Home Visiting Program. Other key elements that require definition include “significant, sustained, positive outcomes” with respect to programs proven through randomized controlled research designs; and definitions of “significant, positive outcomes” with respect to programs proven through quasi-experimental research designs. Only by providing these foundational definitions and criteria can Eligible Entities know the rules by which programs will be allowed to participate in the Home Visiting Program. Moreover, we believe that defining these terms and identifying the criteria for evidence of effectiveness must occur before the Secretary can designate the service delivery models that fit within the categories of models that Eligible Entities may select. Providing this guidance along with the determinations will allow Eligible Entities to make informed decisions regarding the service delivery models and outcomes that best meet the needs of the high risk populations and communities identified in their needs assessment.

After the criteria for evidence of effectiveness are provided by the Secretary, NFP recommends that the Secretary designate the program models that meet the three categories of evidence for outcomes in the six benchmark areas with sufficient specificity to allow States to make informed decisions. We believe that it will be helpful to also provide States with information regarding the relative strengths of the program models and their outcomes based on the criteria for evidence of effectiveness. For these reasons, we suggest that the designation of approved home visiting program models include the following information:

- The specific program models that have outcomes in the six benchmark areas that meet the evidentiary criteria in categories 1, 2 or 3;
- For each outcome, information that distinguishes between intermediate outcomes (e.g. parent education about reducing preventable child injuries) vs. final outcomes (e.g. actual reductions in child injuries); and
- For each outcome, information regarding whether they meet the Secretary’s definition of “significant, positive outcomes,” as required for categories 1 and 2; and “significant, sustained, positive outcomes,” as required for category 1; versus smaller, impacts that do not fall within the Secretary’s definition of “significant” or short-term effects that are not sustained over time.

Without this level of detail, States will not have the information sufficient to determine which program models hold the most promise for achieving targeted outcomes.

II. FUNDS SHOULD BE DISTRIBUTED BASED ON A COMPETITIVE PROCESS OR A HYBRID FORMULA/COMPETITIVE PROCESS

The Home Visiting Program was enacted to help transform our health care system by promoting proven strategies that improve a broad range of child and family outcomes. That the Home Visiting Program requires States to meet quantifiable, measurable child and family health, educational and economic sufficiency benchmarks within 3 and 5 years underscores the importance of funding well-designed initiatives capable of achieving those outcomes. For these reasons, NFP urges the Department to consider an allocation process that is solely based on a competitive process. In the alternative, NFP suggests that the distribution of funds include a significant competitive component, such as a hybrid approach encompassing a combined formula and competitive process. Recognizing that the Department administers other grant programs that incorporate various types of hybrid models, such as the Ryan White Care Act Program, we envision that this approach could include the following factors:

- A defined percentage of grant funding per year, such as 50%, could be allocated to Eligible Entities based on an equitable formula that takes into account the percentage of families residing below a certain economic level. Thus, every State, Territory and Tribe submitting appropriate applications would receive funding to implement and/or expand their home visitation initiatives.
- A defined percentage of grant funding, such as 50%, could be distributed to the Eligible Entities that the Department determined to have submitted the strongest applications that present well-designed home visitation initiatives that exceed the requirements set forth by the Department.

- All Eligible Entities would only be required to submit one application for multi-year funding in their first year, rather than annual applications. This application would be reviewed to determine both formula and competitive funding amounts in the 1st-5th years. In addition, bonus funding could be awarded in the 3rd and 5th years to Eligible Entities that meet or exceed their benchmark goals. Eligible Entities that fail to receive bonus allocations would still be eligible for the bonus funding in the 3rd and 5th years.

We believe that this approach furthers the goals of the Home Visiting Program to provide States with critical funding to address the child and family needs of vulnerable populations but also hold Eligible Entities accountable for measurable improvements in important child and family outcomes. We also believe that this approach can be streamlined to prevent unnecessary bureaucracy.

Should the Department disperse funding based on a formula, NFP recommends that it evaluate applications rigorously based on whether the application is likely to meet appropriate benchmarks in the 3rd and 5th year. NFP recommends that the Department consider the following factors:

- The degree to which the home visiting program(s) chosen addresses the specific needs of the populations to be served;
- The appropriateness of the benchmarks and indicators established for the program models chosen;
- Whether the experience and specificity of plans submitted suggests that the Eligible Entity has adequate capability to implement the program model(s) as intended, with adequate local referral systems, state and local infrastructure to meet requirements for home visitation staff education, program implementation support, evaluation and quality improvement; and linkages with national home visiting program offices that employ thorough-going systems to support effective program implementation;
- Evaluation of the chosen national Home Visiting Program office's experience and capacity to support quality home visiting at scale; and
- An emphasis on the likelihood of achieving quality outcomes, rather than the number of children and families served.

III. TECHNICAL ASSISTANCE TO STATES IN ESTABLISHING BENCHMARKS

The Home Visiting Program statute requires Eligible Entities to establish quantifiable, measurable 3- and 5-year benchmarks for demonstrating program improvements in six areas. These benchmarks are subject to the approval of the Secretary. We write to clarify our original recommendations to recommend that the Secretary provide Eligible Entities with technical assistance to establish relevant benchmarks and appropriate indicators for each benchmark area. We believe that these benchmarks must take into account the indicators and baseline measures of each home visiting program model. In our initial recommendations, we proposed a set of indicators for the NFP program model that will enable States and Eligible Entities to identify and track progress toward meaningful benchmark goals.

IV. MAINTENANCE OF EFFORT

The recent economic downturn has caused dire fiscal projections for many States, Territories and Tribes, which have seen a dramatic increase in the number of children and families living in poverty and in need of effective home visiting services. In order to allow Eligible Entities a process to seek a waiver of the Maintenance of Effort requirements, we recommend that the Secretary devise a waiver or exception process for Eligible Entities unable to meet the Maintenance of Effort requirements. We believe that such a process, based on the discretion of the Secretary, will allow Eligible Entities facing significant fiscal challenges to continue to provide home visiting services to children and families in need.

NFP is grateful for your leadership in implementing this new Program. Please do not hesitate to contact us at tamar.bauer@nursefamilypartnership.org, 303-865-8374, or karen.howard@nursefamilypartnership.org, 303-865-8386 regarding these recommendations or if we can serve as a resource to you as you work toward implementation of this worthy program.

Sincerely,

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Karen S. Howard
Director of Policy & Government Affairs

Cc:
Robert Gordon
Kathy Stack
Audrey Yowell