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Naomi Goldstein
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U.S. Department of Health and Human Services
Administration for Children & Families
Office of Planning, Research, and Evaluation

August 16, 2021

Re: Title IV-E Prevention Services Clearinghouse Handbook of Standards and Procedures

Deputy Assistant Secretary Goldstein:

The American Public Human Services Association (APHSA), the bipartisan membership association representing state and local human services agencies, is pleased to submit comment in response to HHS/ACF's *Title IV-E Prevention Services Clearinghouse Handbook of Standards and Procedures* public comment. Through our affinity group of child welfare agency leaders – the National Association of Public Child Welfare Administrators (NAPCWA) – APHSA is uniquely positioned to understand how Title IV-E Prevention Services Clearinghouse (“Clearinghouse”) standards and procedures act as an enabler or deterrent in helping child welfare agencies fulfill the potential of the Family First Prevention Services Act (FFPSA).

Establishment of the Clearinghouse represents a monumental step forward to advance evidence-based strategies that help children and families stay safely together. Yet, without centering the design of the Clearinghouse in principles of equity, it produces unintended consequences that minimize efficacy of services delivered to children and families and has potential to reinforce disproportionality for non-white communities. Traditional, rigorous research methodologies the Clearinghouse relies on work best to build the evidence base for those that are most conveniently available and easy to evaluate – most typically white communities. Alternative practices that reflect the norms and cultures of underrepresented communities often do not conform to the parameters of “standard” evaluation criteria and agencies lack the evidence base for adapting eligible services to reflect the needs of these communities. Moreover, community voices are not at the table to share their lived expertise when prioritizing evidence and designing review processes.

Despite the charge within FFPSA to establish a Clearinghouse that includes “culturally specific, or location- or population-based adaptations of practices,” the evidence criteria developed in federal law and policy have resulted in a Clearinghouse that is ill-designed to fully reflect the priorities of the families for whom services in the Clearinghouse are intended to benefit. The Administration's [Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#) provides an important lens in which to reassess how the Clearinghouse's Handbook of

American Public Human Services Association advances the well-being of all people by influencing modern approaches to sound policy, building the capacity of public agencies to enable healthy families and communities, and connecting leaders to accelerate learning and generate practical solutions together.

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Standards and Procedures (“Handbook”) can be updated in a way that is centered in equity and equips child welfare agencies with the tools required to meet their communities’ needs.

Below, APHSA has summarized specific changes to the Handbook within each step of the review process that would aid child welfare agencies in their efforts to keep children and families safely together and address the systemic inequities that contribute to overrepresentation of communities of color in the child welfare system. Please reach out to Matthew Lyons, Director of Policy & Research, at mlyons@aphsa.org with any additional questions you may have.

Sheila Poole

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Chair, National Association of Public Child Welfare Administrators
Commissioner, New York Office of Children and Family Services

Matthew Lyons

A handwritten signature in black ink, appearing to read "Matthew Lyons", written in a cursive style.

Director, Policy and Research
American Public Human Services Association

Feedback on Handbook of Standards and Procedures

Chapter 1. Identify Programs and Services for Review

Summary of Current Process

The Handbook considers for review programs and services that are recommendations received in response to the 2018 Federal Register Notice and feedback from federal partners and other key stakeholders. Furthermore, the Clearinghouse conducts at least annually a call for program and service recommendations and may use additional environmental scans and literature reviews to identify programs or services. The Handbook states that particular consideration will be given to programs and services recommended by State or local government administrators and tribes; rated by other clearinghouses; recommended by federal partners; and/or evaluated as part of grants supported by the Children's Bureau.

Recommendations

APHSA recommends the following changes to the Handbook procedures for identifying programs and services for review:

Recommendation 1: Explicitly prioritize for review programs and services that are culturally specific or location- or population-based.

Recommendation 2: Convene a panel of people with lived expertise in the child welfare system to consult with on recommendations for programs and services to review.

Recommendation 3: Ensure diverse representation of Clearinghouse reviewers.

Discussion

To meet the Clearinghouse's charge set forth in statute, more explicit emphasis must be given to ensure culturally specific or location- or population-based programs and services are made available. Countering the systemic barriers building the evidence base for these programs and services requires intentional focus to name them as priority in the Clearinghouse's selection process. Similarly, the Handbook currently has no stated strategy for engaging people with lived expertise to inform their process of identifying program and services for review. Only relying on literature reviews, environmental scans, and conducting annual calls for programs and services through existing dissemination platforms to identify new programs and services further marginalizes underrepresented voices that programs in the Clearinghouse are intended to serve. Proactive engagement of people with lived expertise will serve to center the Clearinghouse's selection process in equity and better reflect the needs of impacted communities. Lastly, advancing racial equity requires a commitment from the Clearinghouse to support a space where researchers and institutions of color are leading voices in helping build the evidence in child welfare. For starters, the Clearinghouse can support this goal by prioritizing recruitment of reviewers that reflect the diverse communities and experiences of people in and served by the child welfare system.

Chapter 2: Select and Prioritize Programs and Services for Review

Summary of Current Process

The Clearinghouse may consider programs and services in four areas set forth in statute – mental health prevention and treatment services, substance abuse prevention and treatment programs and services, in-home parent skill-based programs or services, and kinship navigator programs. To be eligible for the Clearinghouse, programs and services must have available written protocols, manuals, or other documentation that describes how to implement or administer the practice. Adaptations to programs and services are reviewed separately for consideration in the Clearinghouse. Reviewers must determine whether a program or service impacts outcomes in at least one of the four areas, if it is in active use, and whether there are implementation or fidelity supports available in addition to a manual. Furthermore, reviewers are charged to prioritize representation across the four program and service areas.

Recommendations

APHSA recommends the following changes to the Handbook procedures for selecting and prioritizing programs and services for review:

Recommendation 1: Clarify the definition of “written protocols, manuals, or other documentation” to include policy guides, practice guidance, and other information captured (e.g. via traditional methods in Tribal communities).

Recommendation 2: Provide flexibility in assessing “replicability” of programs and services being considered for review that are specific to communities requiring culturally specific or location- or population-based services.

Recommendation 3: Prioritize in reviews representation of programs and services that are reflective of the diverse needs and characteristics of communities served.

Recommendation 4: Consider options for broadening permissible program and service areas such as concrete and economic supports.

Discussion

Recommendations for Section 2 of the Handbook are consistent with and build off those in Section 1. Recognizing the needs of communities with unique cultures, needs, and approaches that call for specialized and adapted services, the Handbook should provide greater flexibility in accepting programs or services that use alternative methods of documenting practice implementation and for which may have more limited replicability in other communities. Furthermore, while the Handbook directs reviewers to select and prioritize for review programs and services equitably across all four areas, there is no priority given for whether programs or services reflect the needs of the diverse range of communities involved in the child welfare system. Explicit examination should be given to what communities utilize the programs and services available and prioritize addressing gaps in communities that lack available programs and services that reflect their specific needs.

While FFPSA statute explicitly lists mental health and substance abuse prevention and treatment services, in-home parent skill-based programs, and kinship navigator programs as eligible prevention services, ACF should closely consider its options to include concrete and economic supports and other unaddressed service areas that have a clear and significant impact in reducing risk factors associated with child maltreatment. To realize the full potential of Family First, we must construct a prevention framework that considers the full range of risk factors and equips agencies and providers with all the tools they need to support child and family well-being.

Chapter 3: Literature Search

Summary of Current Process

The Clearinghouse conducts a literature search for each program or service prioritized for review by identifying citations from other evidence clearinghouse repositories, searching bibliographic databases, and scanning websites of organizations that sponsor or conduct relevant research.

Recommendations

APHS A recommends the following changes to the Handbook procedures for its literature search.

Recommendation 1: Expand its literature search to be language inclusive and include international studies for programs or services that are culturally specific or adapted to immigrant communities.

Recommendation 2: Consider studies and evidence developed by the HHS Substance Abuse and Mental Health Services Administration (SAMHSA) and its network of agencies and providers.

Discussion

The Clearinghouse will be more effective in meeting its charge to include culturally specific programs or services by expanding its literature search to explicitly include international research that is reflective of communities the identified programs or services are assisting. Whereas the 2018 FRN states only studies conducted in the United States, U.K., Canada, New Zealand, or Australia will be acceptable, immigrant communities from other countries may be best served by evidence established in their countries of origin. The Clearinghouse should consider these studies regardless of their language of publication, so long as they are reflective of the population that would be served in the United States.

Further, the Clearinghouse should ensure its review of substance abuse prevention and treatment programs and services is aligned with established evidence used by SAMHSA and its network of agencies and providers. For example, the National Institute on Drug Abuse's *Principles of Drug Addiction Treatment: A Research-Based Guide* offers nine evidence-based approaches to SUD treatment and identified interventions to address co-occurring mental health disorders, with specific evidence-based programs that are considered a best practice in SUD treatment. Given the significant risk factors for child maltreatment associated with substance use disorders, addressing the lack of inclusion of these evidence-based practices in the Clearinghouse remains an urgent priority.

Chapter 4: Study Eligibility Screening and Prioritization

Summary of Current Process

To be eligible for review, studies must be published or prepared in or after 1990, be available publicly through a peer-reviewed journal or in reports commissioned by public, research, or other funded entities, and be available in English. Studies must use a randomized or quasi-experimental group design with at least one intervention condition and at least one comparison condition. Further, studies must measure and report on at least one eligible target outcome specified in the Handbook. When multiple versions of a program or service are eligible for review, the Clearinghouse only reviews one version at a time and other versions may be reviewed as separate programs and services. Studies of a program or service that are substantially modified or adapted from the manual or version (such as a change to content or modality) cannot be considered for review. Studies are generally prioritized for review based on their design (i.e. use of RCTs or QEDs), sample size, duration of sustained effects, number of different outcome domains, and whether a study was pre-registered in a trial registry or has published study protocols.

Recommendations

APHSAs recommends the following changes to the Handbook procedures for its study eligibility screening and prioritization.

Recommendation 1: Develop outcome metrics for review that reduce disparities in child welfare involvement and consider satisfaction with programs and services across all four outcome domain areas.

Recommendation 2: Broaden acceptable study design criteria.

Discussion

The Clearinghouse should establish equity-centered outcome measures to guide the screening and prioritization of studies for review. Explicitly examining whether a program or service helps reduce disparities in child welfare involvement and accounts for participant satisfaction will help the Clearinghouse factor in family voice and better respond to systemic inequities in child welfare participation. Further, while FFPSA statute sets specific parameters in study design requirements the Clearinghouse must consider, ACF should consider what administrative authority it has to broaden acceptable study designs, particularly for programs and services that are culturally specific or location- or population-specific. Current criteria used by the Clearinghouse are overly restrictive and obstruct inclusion of programs and services for underrepresented communities that have particular barriers to meeting these requirements.

Chapter 5: Evidence Review Using the Design and Execution Standards

Summary of Current Process

The Handbook outlines its evidence review process for randomized controlled trial and quasi-experimental designs based upon design and execution ratings from multiple contrasts – comparison of a treated condition to a counterfactual condition on a specific outcome – and (if available) multiple

studies. Each contrast is rated by whether it has high, moderate, or low support of causal evidence for a specified outcome. Only randomized studies that meet high standards for integrity of random assignment and attrition standards can be deemed as “high” support of causal evidence. Further, study groups must meet a high threshold of baseline equivalence to receive “high” or “moderate” ratings. When a baseline equivalence assessment determines an impact model must control for a baseline variable to meet an evidence standard, the Handbook offers several approaches for statistical control that can be used. Further guidance is also provided on recording, correcting, and summarizing impact estimates and managing for other design and execution requirements.

Recommendations

APHSA recommends the following changes to the Handbook procedures for its Evidence Review Using the Design and Execution Standards.

Recommendation 1: Develop separate evidence review criteria for programs and services that meet a “promising” rating.

Recommendation 2: Adjust sample size requirements for underserved communities.

Recommendation 3: Provide an exception to the rule that services provided by only a single administrative unit are a confounding factor for programs or services that are culturally specific or location- or population-based.

Recommendation 4: Support the development of child welfare-specific outcomes for SUD programs and services that have been deemed supported or well-supported by other clearinghouses.

Discussion

Whereas FFPSA law requires that “supported” and “well-supported” practices meet specific thresholds of quasi-experimental or randomized controlled trial design standards, the Clearinghouse has broader flexibility in the evidence standards used to determine “promising” practices. However, the Handbook currently bases its determination of promising practices on the same design and execution standards used for “supported” and “well-supported” practices – requiring at least one contrast in a study that achieves a rating of moderate or high using those standards. Recognizing the barriers these standards place to having equitable, person-centered programs and services in the Clearinghouse, ACF should establish new, separate standards for reviewing “promising” practices that provide better consideration for services that reflect the priorities of people with lived expertise and that are culturally specific or location- or population-based.

The Clearinghouse can also advance more equitable practices by providing exemptions to sample size and administrative unit requirements for programs or services which serve specific communities or cultures and for which such requirements are more difficult to meet. Services for tribal and immigrant communities, families that do not speak English as their first language, and LGBTQ+ children may have particular challenges in meeting these requirements, with specific adaptations needed and limited numbers of appropriate providers. Lastly, the Clearinghouse should make intentional effort to work with



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SUD programs and services well-established as best practices in the substance use field but for which specific child welfare outcome measures may not have been collected in prior studies. Prioritizing additional data collection on child welfare outcomes as needed to be able to assess these for inclusion in the Clearinghouse is important to equip agencies with the best tools needed to support substance use prevention and treatment needs.