



Administration for Children and Families  
U.S. Department of Health and Human Services  
Via email: [preventionservices@abtassoc.com](mailto:preventionservices@abtassoc.com)

**Re: Title IV-E PSC FRN comment  
Request for Public Comment on the Title IV-E Prevention Services Clearinghouse  
Document number 15065**

Dear Administration for Children and Families:

The Family First Prevention Services Act (Family First) was designed to “provide enhanced support to children and families and prevent foster care placements through the provision of mental health and substance abuse prevention and treatment services, in-home parent skill- based programs, and kinship navigator services” (42 USC 622). By identifying and reviewing programs for their eligibility to receive federal funds, the Title IV-E Prevention Services Clearinghouse (Clearinghouse) plays a critical role in achieving this goal. As you know, preventing entry into foster care can support more equitable outcomes for children and families of color. Our recommendations here provide opportunities to achieve this goal and expand the evidence-based service array for families.

We are grateful for this opportunity to share our ideas on how to improve and strengthen the Clearinghouse. Child Trends is a highly respected, nonpartisan research organization focused exclusively on improving the lives and prospects of children, youth, and their families. For nearly 40 years, decision makers have relied on our rigorous research, unbiased analyses, and clear communication to improve public policies and interventions that serve children and families. Our researchers and evaluators have decades of experience working closely with child welfare agencies, communities, and programs to develop and implement evaluations of interventions that are designed to prevent maltreatment.

As noted in the request for comment, this is an ideal time to re-examine the Clearinghouse standards and procedures, based on early lessons learned from the review process and states’ implementation of Family First. We see opportunities for the Clearinghouse to better support equity efforts; play a role in expanding the evidence base; and, through those efforts, support children and families. There are many steps that the Clearinghouse can take to ensure federal funding eligibility for a more robust, culturally and linguistically responsive set of prevention programs that will meet the diverse needs of children, families, and communities. Throughout our comments, we note the applicable chapter of the *Prevention Services Clearinghouse Handbook of Standards and Procedures (Handbook)*.

**Recommendation 1: The review process should be updated to more effectively support and expand the field of evidence-based prevention programs, especially programs designed to serve specific populations and achieve equity for populations at a higher risk of child welfare involvement.**

We applaud ACF’s commitment to revise and update the Clearinghouse standards and procedures to advance racial equity and better support the children and families who are underserved by existing support mechanisms. We believe those goals could be better achieved by taking the following steps:

- **Recruit a diverse group of families and youth to advise and guide the work of the Clearinghouse.** Families and youth with child welfare experience can bring important expertise to the review process by informing Clearinghouse reviewers of the programs that have been most impactful in their lives and ensuring that their perspectives on positive outcomes (and for whom) are fully represented in the Clearinghouse, as well as in individual evaluations. Specifically, we recommend that the Clearinghouse engage a diverse advisory group with experience as service recipients and service providers, including individuals with tribal expertise, to inform the work of the Clearinghouse. Both social science research and child welfare agencies have a history of excluding those most directly impacted by their work from decision making related to the design and evaluation of services. We encourage the Clearinghouse to form a constituent advisory group to inform its work, including current and future updates to its standards and procedures. The panel should, at a minimum, represent the perspectives of those groups elevated under the January 20, 2021 Executive Order: “... including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.” Other federal initiatives that have consulted people with lived experiences, including the Child Welfare Capacity Building Center for States, may provide examples of how to approach this work.
  
- **Apply an equity lens during the identification, selection, and prioritization of programs for review** (*Chapter 1, Prevention Services Clearinghouse Handbook of Standards and Procedures*). We recommend that the Clearinghouse take the following steps:
  - Specifically search for small, under-resourced, single-site programs developed by and for communities of color.
  - Eliminate the single-site and sub-study prohibitions so that more programs will qualify for review.
  - Prioritize and fast-track the review of programs that have been adapted specifically to meet the needs of underserved populations.
  - Expand the definition of a “manual” to include policy guides, practice guidance, and information shared via oral tradition in American Indian/Alaska Native (AI/AN) communities, which for cultural reasons may not be formalized in a “manual.”
  - Prioritize *populations* and *problems* that are underserved by the current array of programs. For example, prioritize reviewing interventions designed for Native American/tribal communities and those that address substance abuse disorder, as these populations and problems are under-represented in the current Clearinghouse.
  - Expand to include program areas that are essential for supporting parenting and mental health (e.g., domestic violence, economic supports), which systemic racism and barriers to access have exacerbated for parents of color.

We recognize that many of the above recommendations do not align with the current Clearinghouse criteria. Below, we recommend several ways to adjust the Clearinghouse's standards to allow a broader set of programs to achieve ratings. We also believe that, by conducting these reviews and sharing them broadly with the field, the Clearinghouse can support programs, evaluators, and funders to better design interventions and evaluations that meet the Clearinghouse standards in the future.

- **Engage with programs and evaluators throughout the review process.** We recommend that the Clearinghouse include more robust engagement between reviewers and the programs/evaluators under review to increase the efficiency and transparency of the review process. For example, section 7.2 could specify that reviewers who are recalculating submitted data are required to discuss their analytic strategy with the evaluator to ensure accuracy. The Clearinghouse could also add a procedural step that would require reviewers to engage with evaluators when a study outcome measure does not seem to map onto the eligible outcome constructs. Outcome constructs may be operationalized in different ways and may be culturally specific, so further information or discussion may help determine whether the outcome measure—as operationalized in a particular evaluation—is assessing an outcome construct of interest to the Clearinghouse. We also recommend that the Clearinghouse conduct reviews in a timely manner and share its anticipated timeline with the program (and any states implementing the program) so that they can plan accordingly. The Clearinghouse may also operate more efficiently if it coordinates with programs/evaluators before beginning the review, in order to adopt the best review timeline. For example, the reviewer may choose to delay a review if the program or evaluator does not believe they have the evidence needed for admission to the Clearinghouse but have an ongoing evaluation that would contribute the needed evidence.

This recommendation is particularly important to fulfill ACF's commitment to increasing racial and ethnic equity. Programs and evaluations are often designed to meet the unique needs of certain communities. Without gaining a more robust understanding of the program's approach and cultural context, the reviewer will be less prepared to critically assess the evaluation itself.

- **Notify programs of results before publicizing the result of the review.** We understand that the Clearinghouse currently publicly disseminates the findings of a review before notifying the program itself. We recommend that the Clearinghouse adjust this approach so that the program has time to discuss the decision with the reviewer, consider or appeal the results, and/or make contingency plans for a funding source. This will allow programs to better plan for any changes in funding that could impact their staff and the families they serve, and will allow evaluators to better plan future evaluations.
- **Broadly share detailed information on rating decisions.** In addition to sharing a decision broadly, we recommend that the Clearinghouse also explain how it made its decision, as well as the rationale behind the decision. Sharing this information broadly with the field will allow state

and community leaders, program developers, and evaluators to learn more about the state of the field and how to design and evaluate programs that will achieve a rating.

**Recommendation 2: Promote equity for children of color in the review standards, and especially for Black and AI/AN youth.**

Children and families of color—and Black and AI/AN children, youth, and families in particular—have experienced historical and ongoing systematic injustices by the child welfare system. In addition, the research field has historically perpetrated harm against individuals and communities of color, which has earned the distrust of these communities and made it more challenging to build evidence that meets Clearinghouse standards. The Clearinghouse has the opportunity to help ameliorate these injustices by allowing additional programs designed by and for communities of color to meet the evidence standards and qualify for federal funding. We therefore recommend the following:

- **Allow greater flexibility for adaptations that meet the needs of different racial and ethnic groups and are responsive to the child welfare context (Section 4.1.6).** Clearinghouse standards currently restrict programs from adapting to meet the needs of populations (e.g., tailoring an intervention to address the experiences of Black families, or adapting a program originally designed for youth with juvenile justice involvement to better meet the needs of youth and families with child welfare system involvement). Other programs, such as Positive Indian Parenting, allow a great deal of flexibility within the program model to tailor to local tribal practices. Program developers may be hesitant to adapt their programs in ways that would increase cultural relevancy—and therefore effectiveness at improving outcomes of interest—due to concern that the adaptation would be reviewed as a new intervention and require a separate evidence-building and review process. This limitation on adaptation stymies innovation and the ability for programs to evolve to better serve children and families; it also limits programs’ potential to positively impact individuals and families from underserved populations through tailored services. At the same time, ad hoc adaptations may happen anyway as programs are implemented and program providers identify potential ways to improve services, but these changes may take place without documentation due to fear of losing federal funding. If so, this lack of documentation limits the field’s ability to understand program effectiveness and expand the implementation of effective programs. When culturally specific and child welfare-specific adaptations have been made to an existing program, we recommend that the Clearinghouse consider the evidence for the originally reviewed program in its review of the adaptation. This will allow states to implement adaptations of evidence-based programs and, at the same time, will continue building evidence for the adaptation through the evaluations required by the Family First Act.
- **Accept studies for review that use outcome measures prioritized by the community served, including measures that may not yet have been assessed to meet the standards for psychometric properties (Section 5.9.2).** Outcome measures should be meaningful to the community served, reflect how the community defines positive outcomes for their children and families, and reflect the community’s cultural values. Additionally, some measures assumed to be reliable by the Clearinghouse (e.g., administrative data on allegations/findings of neglect, certain health measures) may not be valid in all populations and would benefit from using

definitions supplied by community members themselves to reduce the potential for bias. In such cases, evaluators should provide written explanation—either within their study report or in an addendum—of their rationale for selecting the outcome measure(s). Further, many measures that may meet the current criteria for reliability and validity were developed by researchers who are not Black, Indigenous, or people of color, and have been primarily tested in samples that do not reflect the diversity of the racial/ethnic backgrounds represented in child welfare settings.<sup>1</sup>

- **Consider extending the flexibilities afforded to tribal IV-E agencies to community-designed prevention programs implemented by states to serve AI/AN families, Black families, and other families of color.** Tribal IV-E agencies are not required to meet the evidence-based practice criteria for prevention services and may determine their own practice criteria (e.g., values and principles incorporated in the practice, community feedback) for assessing evidence. Engage an advisory group (recommended above), program developers, and evaluators to explore whether additional flexibilities would support evidence-building for programs designed for and by communities of color, including programs serving AI/AN children outside of tribal IV-E agencies, while maintaining rigor. For example, flexibilities may address challenges faced by programs that serve very small or geographically scattered populations, where small sample sizes can make it difficult for evaluations to detect significant impacts, while maintaining rigor.

**Recommendation 3: Interpret Family First’s evidence requirements in a more flexible manner that reflects current social science research standards and the realities of evaluating child welfare interventions, while maintaining the rigor that ensures that children and families receive effective services.**

While some changes to the review standards would require legislative changes, we see immediate opportunities to be more flexible within the Act as written, thereby opening up more studies for review and inclusion. These opportunities include the following:

- **Define an “appropriate comparison practice” more broadly (Section 4.1.4).** While the Act describes that a practice must be “superior to an appropriate comparison group” to be rated, the Handbook operationalizes this to require comparison to “no or minimal intervention” or “treatment as usual.” If an intervention is compared to another intervention rated by the Clearinghouse and found to be equally or more effective within the outcome domains on which the other program is rated, then this evidence should be considered. Other Clearinghouses, including the California Evidence Based Clearinghouse, allow for comparison groups to receive an intervention beyond treatment as usual. This practice would not only allow more studies to meet criteria for review, but would also (more importantly) allow families in the comparison group to receive other interventions and allow rigorous impact studies to be conducted in resource-rich communities looking to expand their array of evidence-based programs.
- **Adopt a threshold for statistically significant effects of  $p < 0.10$  (Section 5.10) as a first step toward incorporating more innovative approaches to measuring effectiveness.** In 2016, the

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<sup>1</sup> Andrews, K., Parekh, J., & Peckoo, S. (2019). How to embed a racial and ethnic equity perspective in research: Practical guidance for the research process. [https://www.childtrends.org/wp-content/uploads/2019/09/RacialEthnicEquityPerspective\\_ChildTrends\\_October2019.pdf](https://www.childtrends.org/wp-content/uploads/2019/09/RacialEthnicEquityPerspective_ChildTrends_October2019.pdf)

American Statistical Association (ASA) released a statement outlining problems inherent with a strict reliance on p values of .05 as a threshold for identifying significant effects.<sup>2</sup> The ASA cautions, “Scientific conclusions and business or policy decisions should not be based only on whether a p-value passes a specific threshold.” We recommend that the Clearinghouse explore the incorporation of new and cutting-edge approaches to measuring effectiveness that overcome some of the limitations of the use of p values. Such alternative approaches might also address the challenge of identifying effective programs when population sizes are small or geographically dispersed. In the meantime, we recommend that the Clearinghouse adopt a less conservative p value threshold.

A p value is an index of the compatibility of the data examined in a particular study with a statistical model—in the case of program evaluations, a statistical model of the effect of a treatment condition on an outcome, in relation to outcomes for a comparison group. If the data are consistent with the model, the evaluator risks making a type I error—that is, incorrectly concluding that a program improves outcomes, when it in fact does not. A lower p value corresponds with a lower tolerance for such an error. In the case of a type I error with human services interventions, an intervention may not improve the outcome of interest in the study even if it is unlikely that the intervention will harm clients. The principal danger of continuing or expanding such an intervention is that program providers and their clients may spend resources (including time and money) providing or participating in a service that is no more beneficial than a comparison service. In contrast, the potential harm of a type II error—incorrectly concluding that a program is not effective when, in fact, it is effective—is that an intervention that improves outcomes may not be eligible for funding, may not be replicated, and/or may be discontinued. Given the fairly slim evidence base in child welfare—particularly for underserved populations—a higher tolerance for type I errors than is typical in medical research (in which the consequences of type I errors can be more severe and even dangerous) seems warranted. It is therefore not uncommon in social science to consider effects as statistically significant at the 90 percent level of significance. Accordingly, we recommend that the Clearinghouse adopt this standard and make this explicit in the Handbook.

- **Develop distinct standards that are more appropriate for “promising” programs evaluated utilizing some form of control.** Family First specifies different standards for a rating of “promising,” compared to “supported” or “well-supported,” but the Handbook applies the same requirements to all three ratings. More specifically, while the Act explicitly requires a quasi-experimental design (QED) or randomized controlled trial (RCT) study design for programs to be rated as “supported” or “well-supported,” promising programs may be evaluated using some form of control, with examples including an untreated group, placebo group, or waitlist study (section 471(e)(4)(C)). We therefore encourage the Clearinghouse to consider additional flexibilities for promising ratings in particular. For example, when taken in combination with our recommendations, there may be opportunities to include qualitative research in evaluating outcomes between treatment and comparison groups to achieve a “promising” rating.

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<sup>2</sup> Wasserstein, R. L., & Lazar, N. A. (2016). The ASA statement on p-values: context, process, and purpose.

Additionally, we encourage the Clearinghouse to develop transparent checklists for reviewing additional types of QEDs, including regression discontinuity designs.

Children and families deserve effective interventions designed specifically to meet their needs and prevent foster care entry. Family First's evaluation requirements provide an opportunity to expand existing prevention efforts, claim federal funding to continue rigorously evaluating child welfare interventions, and build the required evidence to most effectively serve children, families, and communities. In addition to these three recommendations, **we encourage ACF and the Clearinghouse to provide additional technical assistance to states, tribes, and programs as they plan for service delivery and design their evaluations to ensure rigorous evaluation methodologies that meet the Clearinghouse standards.** Ongoing support to jurisdictions is essential for ensuring robust implementation of the prevention opportunities available in the Family First Act.

Thank you for this opportunity to comment on the Clearinghouse. Below my signature, I also include a list of resources from Child Trends that may support your assessment of Clearinghouse standards and procedures. If you have any questions, please contact Elizabeth Jordan at Child Trends ([ejordan@childtrends.org](mailto:ejordan@childtrends.org); (240) 223-9316).

Sincerely,

/s/

Carol Emig, President

#### **Additional resources**

- [Implications of COVID-19 on the Research and Evaluation Provisions of the Family First Act](#)
- [Applying the Research and Evaluation Provisions of the Family First Prevention Services Act](#)
- [Strategies to Build Evidence for Kinship Navigator Programs Under the Family First Act](#)
- [Considerations for Scaling Evidence-Based Prevention Programs under the Family First Prevention Services Act](#)
- [Program Model Purveyors Play an Essential Role in Family First Act Implementation](#)