

July 22, 2018

Naomi Goldstein
Deputy Assistance Secretary for Planning, Research and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services
330 C Street, S.W.
Washington, D.C. 20201

Re: Decisions Related to the Development of a Clearinghouse of Evidence-Based Practices in Accordance with the Family First Prevention Services Act (FFPSA) of 2018; F.R. Doc. 2018-13420.

Dear Deputy Assistant Secretary Goldstein:

The [National Human Services Assembly](http://NationalHumanServicesAssembly.org) is a Washington, D.C.-based association comprised of some of the largest national nonprofit human service organizations. In aggregate, National Assembly members and their affiliates collectively touch, or are touched by, nearly every household in America—as consumers, donors or volunteers. National Assembly's mission is to strengthen human services in the United States through the active involvement and leadership of its members, envisioning a nation that effectively addresses the human service needs of its citizens.

The need for a transparent, flexible, and community-focused clearinghouse for prevention services is vital to building well-being, and we appreciate the opportunity to provide feedback to the Department of Health and Human Services (HHS) on the initial criteria proposed in the Notice as well as offer some potential candidate programs, services, and approaches for inclusion in the clearinghouse.

Sec. 2.2.1 Types of Programs and Services

The National Assembly suggests that HHS prioritize community-based programs for inclusion in the clearinghouse. In-home prevention services that are administered by a community-based organization, are culturally competent, and focus on the needs of the family are the most likely to have sustained positive outcomes when compared to a one-size-fits-all approach. For example, family or kinship navigator programs have generated positive outcomes in the youth justice context. HHS should promote

similar child welfare programs under the FFPSA.¹ Importantly, these programs keep families together and deemphasize the use of foster care or residential treatment.

Sec. 2.2.2 Target Population of Interest

The National Assembly believes that HHS should consider further defining target populations that are “similar” to those involved in the child welfare system by including, specifically, people involved in the juvenile and criminal justice systems. HHS could expand the target populations by adding a non-exhaustive list of similar populations to the currently proposed definition of target populations of interest.

Given the large “cross-over” population between these systems,² it is important to include people involved in the youth justice system and criminal justice system because the interventions included in the clearinghouse could achieve positive impacts for these populations. Additionally, many community-based service providers are referred young people independently from both the juvenile justice and child welfare systems. Youth in these programs face similar mental health or drug challenges that the provisions in the FFPSA are specifically designed to address.

Sec. 2.6.1 Promising Practices Criteria

The clearinghouse should develop criteria for designating a “promising practice” with a lower threshold for statistical significance than an alpha value of $p < .05$, and prioritize the magnitude of the favorable effects on the target outcomes, in other words, “effect size.” Including effect size in the criteria in for designating programs in the clearinghouse is vital because “effect size is the main finding of quantitative study.” While a p value can inform “whether an effect exists, the p value will not reveal the size of the impact” on a target outcome.³ Effect size explains the *amount* of the difference in the targeted outcome measure between the program group and the control group.⁴ The p value measures only the statistical probability that the observed difference in effect size between the program group and control group is due to chance.⁵

While a p value is important to show that the measured outcome is actually statistically related in some way to the program, effect size is necessary to evaluate the extent to which a given program or service increases the target outcomes identified in Section 2.2.3 of the Notice. For example, if Program A and Program B have similar p values ($p_a = .05$, $p_b = .01$), but Program A reduces “the likelihood of foster care placement” by 5% and Program B reduces the likelihood by 50%, then Program B is very likely preferable

to Program A, depending on other practical considerations. This distinction is not captured by comparing only the statistical significance, that is the p values, of the two programs.

HHS should also ensure that when rating studies as either “high,” “moderate,” or “low” in terms of rigor and reliability that the agency fully considers the challenges of program evaluation in the context of child welfare. Due to ethical and practical considerations, randomized controlled trials (RCTs) are often infeasible. Further, RCTs typically “do not account for differences in culture and context found across underserved populations.”⁶ Regardless of the specific evaluation method, all programs should be designed to include checks on internal validity and the ability to replicate the program in other contexts. Absent contemporaneous findings of “unfavorable effects,” the clearinghouse should give a rating of “moderate” to quasi-experimental studies that incorporate these characteristics. A “high” rating should not, moreover, be reserved exclusively for RCTs, and HHS should be willing to rate quasi-experimental studies as “high” on criteria 2.5.4 through 2.5.6, even if they are not the conventional “gold standard.”

Sec. 3.0 Recommendations of Potential Candidate Programs and Services for Review

The National Assembly believes the following programs and resources provide good examples of the considerations that HHS should take into account as it finalizes its criteria for the clearinghouse:

- *A Child Welfare Leader’s Desk Guide to Building a High-Performing Agency* by The Annie E. Casey Foundation is a tool to help motivate internal and external partners to make positive change and commit to better outcomes;⁷
- *Beyond Bars: Keeping Young People Safe at Home and Out of Youth Prisons* is a publication of the National Collaboration for Youth and Youth Advocate Programs, Inc. The report serves as a handbook for juvenile justice administrators, legislators, judges, the non-profit community and youth advocates for how to end the practice of youth incarceration, promote public safety and restore a sense of belonging for our young people in their homes and neighborhoods;⁸ and
- Since 2009, HHS has sponsored an independent systematic review of the teen pregnancy prevention literature to identify programs with evidence of effectiveness in reducing teen pregnancy, sexually transmitted infections, and associated sexual risk behaviors, the HHS Teen Pregnancy Prevention Evidence Review.⁹

These examples highlight the transparency, flexibility, and community-focus that will help the FFPSA increase well-being for families and ensure all youth and children can reach their full potential.

Respectfully,



Brandon Toth
Director of Public Policy
National Human Service Assembly



Lee Sherman
President & CEO
National Human

¹ Kinship Navigator Programs - Summary & Analysis, www.grandfamilies.org, available at <http://www.grandfamilies.org/Topics/Kinship-Navigator-Programs/Kinship-Navigator-Programs-Summary-Analysis> (last visited July 19, 2018); *Beyond Bars*, National Collaboration for Youth 16, (2016), available at <https://www.nationalassembly.org/resources/beyond-bars-keeping-young-people-safe-at-home-and-out-of-youth-prisons/>.

² Judge Michael Nash and Shay Bilchik, *Child Welfare and Juvenile Justice – Two Sides of the Same Coin, Part II* 23, *Juvenile Justice Today* (2009).

³ Gail M. Sullivan, MD, MPH and Richard Feinn, PhD, *Using Effect Size—or Why the P Value Is Not Enough*, 4(3) J. GRAD. MED. EDUC. 279 (2012) available at <http://www.jgme.org/doi/pdf/10.4300/JGME-D-12-00156.1>.

⁴ *Id.*

⁵ *Id.*

⁶ Practice-Based Evidence and Evidence-Based Practice, available at <https://nrepp-learning.samhsa.gov/practice-based-evidence-and-evidence-based-practice> (last visited July 19, 2018).

⁷ A Child Welfare Leader’s Desk Guide to Building a High-Performing Agency, The Annie E. Casey Foundation, available at <http://www.aecf.org/m/resourcedoc/aecf-10Practicespart1-2015.pdf>.

⁸ <https://www.nationalassembly.org/resources/beyond-bars-keeping-young-people-safe-at-home-and-out-of-youth-prisons/> (last visited July 20, 2018).

⁹ <https://tppevidencereview.aspe.hhs.gov/> (last visited July 20, 2018).