



**STATE OF WASHINGTON  
DEPARTMENT OF CHILDREN, YOUTH, AND FAMILIES**

1500 Jefferson Street, SE • P.O. Box 40975 • Olympia WA 98504-0975

August 12, 2021

Naomi Goldstein  
Deputy Assistant Secretary for Planning, Research, and Evaluation  
Administration for Children and Families  
U.S. Department of Health and Human Services

RE: Title IV-E PSC FRN comment

Dear Ms. Goldstein:

Washington State Department of Children, Youth and Families (DCYF) appreciates the opportunity to provide input on how the Title IV-E Prevention Services Clearinghouse process can be improved, as operationalized by the Handbook of Standards and Procedures. In order for the Family First Prevention Services Act (FFPSA) to have meaningful impact on the prevention services continuum for those at imminent risk of entering foster care, the availability of evidence-based programs that meet the needs of diverse populations across age ranges within our communities is critical. Ensuring a robust array of services that meet the needs for in-home parenting supports, mental health supports, substance abuse treatment and kinship navigator programs will allow for the full realization of FFPSA as intended. We are encouraged that the Administration for Children and Families (ACF) has issued a request for feedback on how to streamline, prioritize and improve the process by which evidence-based programs are considered, reviewed and approved.

The Department of Children, Youth, and Families is a cabinet-level agency focused on the wellbeing of children. Our vision is to ensure that "Washington State's children and youth grow up safe and healthy—thriving physically, emotionally and academically, nurtured by family and community." We have a strong commitment to enhancing Racial Equity, Diversity and Inclusion within our state and eliminating racial disproportionality within the child welfare system. DCYF values the partnership with all 29 federally recognized tribes within our state, and partnered with them to gather data on prevention practices embraced within their communities. A link to that report is here:

<https://www.dcyf.wa.gov/sites/default/files/pdf/reports/TribalCWPrevention2020.pdf>

Only one of the identified programs is currently listed on the Title IV-E Prevention Services Clearinghouse.

We respectfully submit the following feedback in response to [Federal Register Notice 86 FR 37332](#):

#### Section 1:

- Identify and prioritize culturally specific interventions, especially those designed, developed and tested *by and for* communities of color and Tribal populations.
- Apply a race equity lens with explicit consideration that current evidence standards privilege well-resourced, academically driven interventions and not those developed by and for the communities most impacted by the problems Family First is trying to address.
- Consider interventions that are broader than clinically and individually focused that acknowledge the multiple reasons for and root causes of child welfare system involvement (e.g. economic hardship, unemployment, housing instability, etc). In WA state programs such as Bridge to Self-Sufficiency and Mobility Mentoring have been successful in addressing poverty services

#### Section 2:

- Prioritize populations and problems that are underserved by the current array of programs available on the Clearinghouse, including those essential to stabilizing families (e.g. economic and concrete supports, housing, childcare, programs designed to address domestic violence)
- Prioritize programs designed with and developed for communities of color and Tribal populations

#### Section 4:

- Prioritize studies with samples are most relevant to the child welfare population
- Include people with lived experience in decision-making around programs to prioritize for review
- Provide more information about the permissibility of quasi-experimental designs and/or broaden the acceptability of additional design options

#### Section 5:

- Reconsider the evidence standard
  - Consider the ethical implications of instituting randomization processes in settings where services are already available to families
  - Adjust sample size requirements so that Tribal programs can qualify OR provide funding that supports multiple Tribes joining together in an evaluation
  - Increase representation in the experts involved in the study review, particularly evaluators working in Tribal communities who have knowledge about unique and culturally appropriate evaluation methods
- Revisit the 12 month follow-up standard for well-supported programs; child welfare funding mechanisms do not often support longitudinal designs and should be recalibrated to further the evidence-building process
- Consider a different evidence standard for adaptations

#### Section 6:

- In the Programs and Services Planned for Review section, provide additional information about which models are currently under review, which are next, and an estimated timeline
- For models already reviewed, provide a clear explanation for the assigned rating and recommendations for what is missing or needs to be addressed in future research

Thank you in advance for your consideration of this input.

Sincerely,

Maria Zdzieblowski, LICSW  
Family First Prevention Program Supervisor  
Washington State DCYF

Rachel Mercer  
Family First Prevention Program Administrator  
Washington State DCYF