Opportunity to Provide Feedback on the Family First Prevention Services Act's Clearinghouse for Evidence-based Practices

Considerations for the Federal Register Request for Public Comments

July 13, 2018
Presenters

Barbara Pryor, Senior Director, Public Policy, Casey Family Programs, bpryor@casey.org

JooYeun Chang, Managing Director, Knowledge Management, Casey Family Programs, jchang@casey.org

Peter J. Pecora, Managing Director, Research Services, Casey Family Programs, ppecora@casey.org
Our discussion today is intended to

1. Help inform discussions among jurisdictions and system partners regarding whether to submit comments

2. For those jurisdictions and system partners who choose to submit comments,
   • Highlight some of the areas for potential consideration when determining comments
   • Offer some resources and tools that may support jurisdictional and system partners’ development and submission of comments
SAFESTRONGSUPPORTIVE

THE FAMILY FIRST PREVENTION SERVICES ACT (P.L. 115-123)

QUICK OVERVIEW
Family First Prevention Services Act of 2018

- The Family First Prevention Services Act was passed and signed into law (P.L. 115-123) as part of the Bipartisan Budget Act on February 9, 2018.
  - New option for States and Tribes to claim Title IV-E funds for prevention activities as early as October 1, 2019.
  - New policy to ensure appropriate placements for children in foster care as early as October 1, 2019.
  - New funding and reauthorization of existing funding for child welfare programs including prevention funding, court funding, and specific substance abuse prevention grant funding.
## Big Opportunities for Child Welfare

<table>
<thead>
<tr>
<th>Pre-2018 Federal law</th>
<th>FFPSA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Most federal funding for foster care</td>
<td>New federal funding for prevention</td>
</tr>
<tr>
<td>Services only for child</td>
<td>Prevention services for parent(s) and child</td>
</tr>
<tr>
<td>Income test to qualify</td>
<td>NO income test, just what an at risk family needs</td>
</tr>
<tr>
<td>No dedicated kinship navigator funding</td>
<td>NEW 50% reimbursement for kinship navigators</td>
</tr>
<tr>
<td>No funding for child placed with parent in residential treatment</td>
<td>12-months of federal funding for such placements</td>
</tr>
</tbody>
</table>
New Funding for Prevention Activities (1)

- Allows states to receive open-ended entitlement (Title IV-E) funding for evidence-based prevention services.
  - **Who:** 1) Children at imminent risk of placement in foster care and their parents or kinship caregivers, or 2) pregnant and parenting youth in foster care are eligible.
    - No income test for eligibility
    - Defines children who are “candidates for foster care” as those who can remain safely at home or in a kinship placement with receipt of services or programs
  - **What:** Allows the following evidence-base services to be reimbursed
    - Mental health prevention and treatment services provided by a qualified clinician for not more than a 12 month period.
    - Substance abuse prevention and treatment services provided by a qualified clinician for not more than a 12 month period.
    - In-home parent skill-based programs that include parenting skills training, parent education and individual and family counseling for not more than a 12 month period.

There is no limit on how many times a child and family can receive prevention services.
New Funding for Prevention Activities (2)

• Requires prevention services and programs to be **promising, supported, or well-supported** to qualify for reimbursement.
  – Requires the Secretary of HHS to issue guidance to states regarding the practices criteria required for services or programs under this section by Oct. 1, 2018, which must include a pre-approved list of services and programs that satisfy the requirements

• Requires a state to submit a **prevention and services program plan** as part of the state’s Title IV-E plan
  – Requires the plan to include a number of components such as a description of how the state will administer the program, determine eligibility, train caseworkers and numerous other items.
New Funding for Prevention Activities (3)

• Reimbursement rates for prevention activities are:
  – Beginning October 1, 2019 through September 30, 2026, FFP is 50%
  – Beginning October 1, 2026, FFP is the state’s FMAP rate.
  – At least 50% of the spending in every fiscal year must be for well-supported practices.

• States who opt to administer a prevention program also may claim Title IV-E reimbursement for administrative costs at 50% and training costs at 50%.
  – As with the prevention services, these costs are “delinked” from AFDC so not related to the income eligibility of the child or their family.
Request for Comments on Clearinghouse

- Federal Register Notice: [Decisions Related to the Development of a Clearinghouse of Evidence-Based Practices in Accordance With the Family First Prevention Services Act of 2018](#)
- Deadline: Sunday, July 22, 2018
- To submit: email ffclearinghouse@acf.hhs.gov
- Keep in mind: If you decide to comment,
  - You do not need to comment on every issue in the notice – you can pick and choose
  - You will need to clearly link each comment to a specific section number identified within the notice
  - Casey Family Programs can provide a draft template to help you think about ways to organize your comments
FEDERAL REGISTER REQUEST FOR COMMENTS ON FFPSA CLEARINGHOUSE

WHAT IS IT & WHAT’S AT STAKE?
Federal Register Notice

- Solicitation of comments on *initial criteria and potential candidate programs and services for review in a Clearinghouse* of evidence-based practices in accordance with FFPSA.
- Federal register notice/request for comments reflects ACF/HHS’s *interpretation of the law*, but it is not the law itself.
- Clearinghouse intended to be *illustrative not exhaustive*, and represent a subset of interventions jurisdictions can choose from: not reviewing/including a program does not mean it may not be eligible for FFPSA funding.
Scope of Request for Comments

1. Potential initial criteria for
   a) identifying eligible programs and services for review by the Clearinghouse
   b) prioritizing eligible programs and services for review
   c) identifying eligible studies aligned with prioritized programs and services
   d) prioritizing eligible studies for rating
   e) rating studies
   f) rating programs and services as promising, supported, and well-supported practices

2. Potential programs and services that may meet the aforementioned criteria and that should be considered as candidates for systematic review
Why this matters...

• Jurisdictions and system partners have the opportunity to decide whether to weigh in on the approach ACF/HHS is taking as to how the Clearinghouse will prioritize criteria and programs.
• If you have programs you believe will qualify for FFPSA, commenting on the prioritization guidelines for the Clearinghouse to have them reviewed might expedite/help the process.
• There are some key differences between what the law says and how HHS is interpreting it and what it is proposing, and it is important for jurisdictions and system partners to understand them.
For example…

- **Kinship Navigator Programs** are treated separately from other foster care prevention services and programs in the Family First Prevention Services Act:
  - The Family First Prevention Services Act has specific provisions concerning Kinship Navigator Programs, which are separate from those for Foster Care Prevention Services and Programs.
  - The Federal Register notice, however, combines the two categories of programs and services and imposes identical requirements on both, some of which are inconsistent with the federal law.

(excerpt from Generations United considerations for comments)
RESPONDING TO THE FEDERAL REGISTER REQUEST FOR COMMENTS

POTENTIAL CONSIDERATIONS & RESOURCES
### General Practice Requirements

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Book or Manual</strong></td>
<td>The practice has a book, manual, or other available writings that specify the components of the practice protocol and describe how to administer the practice.</td>
</tr>
<tr>
<td><strong>No Empirical Risk of Harm</strong></td>
<td>There is no empirical basis suggesting that, compared to its likely benefits, the practice constitutes a risk of harm to those receiving it.</td>
</tr>
<tr>
<td><strong>Weight of Evidence Supports Benefits</strong></td>
<td>If multiple outcome studies have been conducted, the overall weight of evidence supports the benefits of practice.</td>
</tr>
<tr>
<td><strong>Reliable &amp; Valid Outcome Measures</strong></td>
<td>Outcome measures are reliable and valid, and are administered consistently and accurately across all those receiving the practice.</td>
</tr>
<tr>
<td><strong>No Case Data for Severe or Frequent Risk of Harm</strong></td>
<td>There is no case data suggesting a risk of harm that was probable caused by the treatment and that was severe or frequent.</td>
</tr>
</tbody>
</table>
## FFPSA Evidence-Based Practice Requirements

<table>
<thead>
<tr>
<th>Evidence Level</th>
<th>Requirements for all Evidence Levels</th>
<th>Control Group</th>
<th>Sustained Effect</th>
</tr>
</thead>
</table>
| **Promising**  | • The practice is superior to an appropriate comparison practice using conventional standards of statistical significance  
• Rated by an independent systematic review  
• For Supported & Well Supported…carried out in usual care or practice setting | • 1 untreated control, waitlist or placebo study | • No follow-up study is required |
| **Supported**  | • 1 RCT or rigorous quasi-experimental | • 6 months | |
| **Well Supported** | • 2 RCTs or rigorous quasi-experimental | • 12 months | |
Federal Register criteria sections for potential comment (1)

1. What populations are “similar” to children/parents involved in CW? (2.2.2)

2. Which types of mental health, substance abuse, and child/family outcomes should be considered “target outcomes”? (2.2.3)

3. What is “trauma-informed practice”? (2.2.7)
Federal Register criteria sections for potential comment (2)

4. Impact studies are limited to government reports and peer-reviewed journal articles (2.3.1)

5. “Access to service, satisfaction with programs and services” are not target outcomes. (2.2.3)

6. Research is limited to US, UK, Canada, New Zealand or Australia, published in English and from 1990 onward. (2.3.3 to 2.3.5)
Federal Register *criteria sections* for potential comment (3)

7. Recommendations of potential candidate programs/services for review (3.0)
Federal Register programs and services for potential comment
Mental Health (Caregivers)

- Cognitive Behavioral Therapy (CBT)***
- Dialectical Behavior Therapy (DBT)**
- Eye Movement Desensitization and Reprocessing (EMDR)***
- Multi-Dimensional Family Therapy (MDFT)***
- Multisystemic Therapy (MST)***
- Trauma-Focused Cognitive Behavior Therapy (TF-CBT)***

*Note:* The number of asterisks for each intervention corresponds to the California Evidence-Based Clearinghouse for Child Welfare (CEBC) evidence levels; more federal guidance will be issued this fall on the FFPSA criteria.
Substance Abuse Prevention and Treatment (Caregivers)

Substance Abuse Prevention Programs for Adults:
• Color it Real: An HIV and Substance Abuse Prevention Program for Young Adults+ (+ = NREPP rating; see also NIDA rating)

Substance Abuse Treatment Programs:
• Dialectical Behavior Therapy for Substance Abuse**
• Motivational Interviewing***
• Parent Child Assistance Program (PCAP) substance abuse treatment for caregivers***
• Sobriety Treatment and Recovery Teams (START)*
In-Home Parent Skill-Based Programs: Parent Training & Education

- Circle of Security (COS)*
- Healthy Families America**
- Homebuilders model of family-based services**
- Incredible Years***
- Nurturing Parenting Program (NPP)*
- Parent Management Training: Oregon Model***
- Parent-Child Interaction Therapy (PCIT)***
- Parenting with Love and Limits (PLL)**
- Promoting First Relationships*
- SafeCare**
- Strengthening Families Program*
In-Home Parent Skill-Based Programs: Individual & Family Counseling

See parenting skills training interventions on previous slide plus:

• Attachment and Biobehavioral Catch-up (ABC)***
• Attachment-based Family Therapy (ABFT)***
• Brief Strategic Family Therapy**
• Dialectical Behavior Therapy**
• Functional Family Therapy (FFT)**
• Multisystemic Therapy (MST)***
Interventions that meet the standards for FFPSA funding

Based on review of multiple evidence-based Clearinghouses and the law, CFP identified more than 140 interventions that we believe qualify for FFPSA funding.

- California Evidence Based Clearinghouse for Child Welfare
- Promising Practices Network
- What Works Clearinghouse
- Coalition for Evidence-Based Policy
- OJJDP Model Programs Guide
- HomVEE - Home Visiting Evidence of Effectiveness
- National Registry of Evidence-Based Programs and Practices
- State Implementation & Scaling up Evidence-based Practices Center
- National Child Traumatic Stress Network
- Blueprints for Healthy Youth Development
Potential Approach to Consider: FFPSA Interventions Catalog

• A summary of research-based interventions that have sufficient research evidence to likely qualify for FFPSA reimbursement (subject to forthcoming Federal guidance).

• Includes: Age range, Duration, Effectiveness rating, Effect sizes, Cost, Cost-savings data (where available), and if the EBP was used as part of a Title IV-E waiver.

• Note that the duration of most EBPs is <12 months.
### Mental Health Services for Children and Parents (Total: 82)

#### Well-supported (sub-total: 28):
- Acceptance and Commitment Therapy (ACT) for Adults
- Acceptance and Commitment Therapy (ACT) for children with anxiety
- Acceptance and Commitment Therapy (ACT) for adults with anxiety
- Acceptance and Commitment Therapy (ACT) for adults with schizophrenia and psychosis
- Acceptance and Commitment Therapy (ACT) for children with depression
- Aggression Replacement Training® (ART)
- Attachment and Biobehavioral Catch Up (ABC)
- Child and Family Traumatic Stress Intervention (CFTSI)
- Cognitive Behavioral Therapy (CBT)
- Cognitive Behavioral Therapy (CBT) for Adult Anxiety
- Cognitive Behavioral Therapy (CBT) for Adult Depression
- Cognitive Behavioral Therapy (CBT) for Adult Posttraumatic Stress Disorder (PTSD)
- Cognitive Behavioral Therapy (CBT) for Adult Schizophrenia and Psychosis
- Cognitive Behavioral Therapy (CBT) for Children with Anxiety
- Cognitive Behavioral Therapy (CBT) for Children with Trauma
- Cognitive Behavioral Therapy (CBT) – Individual Therapy for Children with Anxiety
- Cognitive Therapy (CT)
- Coping Cat
- Coping Power Program
- Eye movement desensitization and reprocessing (EMDR) for Adult PTSD
- Eye movement desensitization and reprocessing (EMDR) for Children
- Mindfulness-Based Cognitive Therapy (MBCT) for Adults
- Multidimensional Family Therapy (MDFT)
- Parent Child Interaction Therapy (PCIT)
- Problem Solving Skills Training for Children
- Prolonged Exposure Therapy for Adolescents (PE-A)
- Trauma-Focused Cognitive Behavioral Therapy (TF-CBT)
- Triple P – Positive Parenting Program – Level 4 Individual for Child Disruptive Behavior

#### Supported (sub-total: 23):
- Accelerated Resolution Therapy
- Blues Program
- Building Confidence
- Chicago Parent Program (CPP)
- Childhaven Childhood Trauma Treatment
- Cognitive Behavioral Therapy (CBT) for Child and Adolescent Depression
- Cognitive Behavioral Therapy (CBT) – Group Therapy for Children with Anxiety
- Cognitive Behavioral Therapy (CBT) – Parent counseling for young children with anxiety
- Collaborative & Proactive Solutions (CPS)
- Community Reinforcement + Vouchers Approach (CRA + Vouchers)
- Dialectical Behavior Therapy (DBT)
- Dialectical Behavior Therapy (DBT) for Adolescent Self-Harming Behavior
- Families and Schools Together (FAST)
- Family-Focused Treatment for Adolescents (FFT-A)
- Interpersonal Psychotherapy-Adolescent Skills Training (IPT-AST)
- Multi-Family Psychoeducational Psychotherapy (MF-PEP)
- New Beginnings (for children of divorce)
- Parenting with Love and Limits (PLL)
- Positive Peer Culture (PPC)
- Primary and Secondary Control Enhancement Training (PASCET)
- Problematic Sexual Behavior- (PSB-CBT-S)- for School Age Children
- Trauma-Focused Cognitive-Behavioral Therapy (TF-CBT) for Sexual Behavior Problems in Children

#### Promising (sub-total: 31):
- 1-2-3 Magic
- ACTION
- Adolescent Coping with Depression (CWD-A)
- Behavioral Activation Treatment for Depression (BATD)
- Brief Eclectic Psychotherapy for PTSD (BEPP)
- C.A.T. Project
- Child-Centered Play Therapy (CCPT)
- CICC’s Effective Black Parenting Program (EBPP)
- Cognitive Behavioral Analysis System of Psychotherapy (CBASP)
- Cognitive-Behavioral Coping-Skills Training
- Cognitive Processing Therapy (CPT)
- Combined Parent-Child Cognitive-Behavioral Therapy (CPC-CBT)
- Cool Kids
- Exchange Parent Aide
- Fairy Tale Model (Treating Problem Behaviors: A Trauma-Informed Approach)
- Family Connections
- Helping the Noncompliant Child
- Interpersonal Psychotherapy for Depressed Adolescents (IPT-A)
- Life Space Crisis Intervention (LSCI)
- Mindfulness-Based Cognitive Therapy for Children (MBCT-C)
- Nurturing Parenting Program for Parents and their School-age Children 5 to 12 Years
- Parents Anonymous
- Play and Learning Strategies–Infant Program
- Solution-Based Casework (SBC)
- Structured Psychotherapy for Adolescents Responding to Chronic Stress (SPARCS)
- Structured Sensory Intervention for Traumatized Children, Adolescents and Parents (SITCAP-ART)
- Trauma and Grief Component Therapy for Adolescents (TGCT-A)
- Wraparound
### Substance Abuse Prevention and Treatment for Children and Parents (Total: 25)

<table>
<thead>
<tr>
<th>Well-supported (sub-total: 4):</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Communities that Care for Substance Abuse Prevention</td>
</tr>
<tr>
<td>- Motivational Interviewing</td>
</tr>
<tr>
<td>- Multidimensional Family Therapy (MDFT)</td>
</tr>
<tr>
<td>- PROSPER</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Supported (sub-total: 14):</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Adaptive Stepped Care</td>
</tr>
<tr>
<td>- Adolescent Community Reinforcement</td>
</tr>
<tr>
<td>- Approach/Assertive Continuing Care (A-CRA/ACC)</td>
</tr>
<tr>
<td>- Adolescent Coping with Depression (CWD-A)</td>
</tr>
<tr>
<td>- Adolescent-focused Family Behavior Therapy</td>
</tr>
<tr>
<td>- Adult-focused Family Behavior Therapy</td>
</tr>
<tr>
<td>- Brief Marijuana Dependence Counseling (BMDC)</td>
</tr>
<tr>
<td>- Buprenorphine (or buprenorphine/naloxone) maintenance treatment for opioid use disorder</td>
</tr>
<tr>
<td>- Ecologically Based Family Therapy</td>
</tr>
<tr>
<td>- Families Facing the Future for parents taking Methadone</td>
</tr>
<tr>
<td>- Functional Family Therapy (FFT) for adolescents with substance use disorder</td>
</tr>
<tr>
<td>- Helping Women Recover &amp; Beyond Trauma (HWR/BT) [Substance Abuse Treatment (Adult)]</td>
</tr>
<tr>
<td>- Injectable naltrexone for opiates Methadone maintenance for opioid use disorder</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Promising (sub-total: 7):</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Alcohol Behavioral Couple Therapy</td>
</tr>
<tr>
<td>- C.A.R.E.S. (Coordination, Advocacy, Resources, Education and Support)</td>
</tr>
<tr>
<td>- Cognitive-Behavioral Coping-Skills Therapy for alcohol or drug use disorders</td>
</tr>
<tr>
<td>- Matrix Model Intensive Outpatient program</td>
</tr>
<tr>
<td>- Seeking Safety</td>
</tr>
<tr>
<td>- Sobriety Treatment and Recovery Teams (START)</td>
</tr>
<tr>
<td>- 12-Step Facilitation Therapy for Substance Abuse (TSF)</td>
</tr>
</tbody>
</table>

### In-Home Parent Skill-Based Programs: Parenting Skills Training and Parent Education (Total: 14)

<table>
<thead>
<tr>
<th>Well-supported (sub-total: 4):</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Attachment-Based Family Therapy (ABFT)</td>
</tr>
<tr>
<td>- Family Connects</td>
</tr>
<tr>
<td>- Nurse Family Partnership (NFP)</td>
</tr>
<tr>
<td>- The Incredible Years</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Supported (sub-total: 5):</th>
</tr>
</thead>
<tbody>
<tr>
<td>- AVANCE Parent-Child Education Program</td>
</tr>
<tr>
<td>- Home Instruction for Parents of Preschool Youngsters (HIPPY)</td>
</tr>
<tr>
<td>- SafeCare</td>
</tr>
<tr>
<td>- Tuning In To Kids (TIK)</td>
</tr>
<tr>
<td>- Tuning In To Teens (TINT)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Promising (sub-total: 5):</th>
</tr>
</thead>
<tbody>
<tr>
<td>- All Babies Cry (ABC)</td>
</tr>
<tr>
<td>- Circle of Security-Home Visiting-4 (COS-HV4)</td>
</tr>
<tr>
<td>- Early Head Start-Home Visiting (EHS-HV)</td>
</tr>
<tr>
<td>- Infant Health and Development Program (IHDP)</td>
</tr>
<tr>
<td>- GenerationPMTO (individual delivery format)</td>
</tr>
<tr>
<td>- Infant Health and Development Program (IHDP)</td>
</tr>
</tbody>
</table>

### In-Home Parent Skill-Based Programs: Individual and Family Counseling (Total: 23)

<table>
<thead>
<tr>
<th>Well-supported (sub-total: 3):</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Healthy Families America (HFA)</td>
</tr>
<tr>
<td>- Minding the Baby® (MTB)</td>
</tr>
<tr>
<td>- The Family Check-up (FCU)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Supported (sub-total: 6):</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Child-Parent Psychotherapy (CPP)</td>
</tr>
<tr>
<td>- Child Parent Relationship Therapy (CPRT)</td>
</tr>
<tr>
<td>- Functional Family Therapy (FFT)</td>
</tr>
<tr>
<td>- Intensive Family Preservation Services (HOMEBUILDERS®)</td>
</tr>
<tr>
<td>- Multisystemic Therapy (MST)</td>
</tr>
<tr>
<td>- Strengthening Families for Parents and Youth 10–14</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Promising (sub-total: 14):</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Alternatives for Families: A Cognitive Behavioral Therapy (AF-CBT)</td>
</tr>
<tr>
<td>- Child FIRST (Child and Family Interagency, Resource, Support, and Training)</td>
</tr>
<tr>
<td>- Cue-Centered Treatment (CCT)</td>
</tr>
<tr>
<td>- Domestic Abuse Intervention Project - The Duluth Model (DAIP)</td>
</tr>
<tr>
<td>- Early Pathways Program (EPP)</td>
</tr>
<tr>
<td>- Families First</td>
</tr>
<tr>
<td>- Family Centered Treatment</td>
</tr>
<tr>
<td>- Multisystemic Therapy Building Stronger Families (MST-BSF)</td>
</tr>
<tr>
<td>- Parent Child Assistance Program (PCAP)</td>
</tr>
<tr>
<td>- Promoting First Relationships (PFR)</td>
</tr>
<tr>
<td>- Risk Reduction through Family Therapy (RRFT)</td>
</tr>
<tr>
<td>- Step-by-Step Parenting Program©</td>
</tr>
<tr>
<td>- Trauma Affect Regulation: Guide for Education and Therapy for Adolescents (TARGET-A)</td>
</tr>
<tr>
<td>- Wraparound (in-home parent support focus)</td>
</tr>
<tr>
<td>Program Model or Intervention</td>
</tr>
<tr>
<td>------------------------------</td>
</tr>
<tr>
<td>Trauma-Focused Cognitive Behavioral Therapy (TF-CBT)</td>
</tr>
<tr>
<td>Triple P – Positive Parenting Program – Level 4 Individual for Child Disruptive Behavior</td>
</tr>
</tbody>
</table>
Additional Resources

ON CASEY.ORG
- Webinar Recording and PowerPoint

ON CFP EXTRANET SITE
- Folder of relevant resources:
  - Webinar Recording and PowerPoint
  - CFP’s Draft Template to Use/Adapt for Comment Submission
  - Sample Comments from Other Organizations
- Click link below to request permission to access: