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Behavioral & Brain Sciences

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November 6, 2023

Lauren Supplee, PhD
Administration for Children and Families
330 C St SW
Washington, DC 20201

Dear Dr. Supplee:

Thank you for the opportunity to comment on the [Title IV-E Prevention Services Clearinghouse Handbook of Standards and Procedures, Draft Version 2.0](#) to replace Handbook of Standards and Procedures, Version 1.0. These comments are in response to the request for public comment [88 FR 73021](#).

I write on behalf of the Federation of Associations in Behavioral and Brain Sciences. FABBS represents 29 scientific societies and over 60 university departments whose scientific members and faculty share a commitment to advancing knowledge in these disciplines. FABBS is deeply committed to facilitating research supported policy and practice decisions.

FABBS strongly supports the expanded categories of eligible comparison conditions as described in 4.1.7 Comparison Conditions and appreciates the footnote on page 34 further clarifying the permissibility of active control groups. Not only does this update allow for the inclusion of more effective programs, the revised criteria align with the most rigorous evaluation methods as required by other federal agencies that fund research and evaluation.

Recognizing the wisdom of this update, FABBS encourages the Administration for Children and Families (ACF) to develop a process for states to adjust previously proposed plans. Allowing states this flexibility will ensure their ability to most effectively use federal funds to support families at risk of foster care to allow for programs previously ineligible due to initial criteria regarding control groups.

Thanks again for the opportunity to comment. Please contact me at jbaron@fabbs.org or 202.669.4834 with any further questions.

Sincerely,

Juliane Baron

Executive Director, FABBS