

March 22, 2018

Jerry Milner
Associate Commissioner, Children's Bureau
Administration for Children and Families
HHS Portals Building, Suite 800
1250 Maryland Avenue, SW.
Washington, DC 20024

Dear Mr. Milner,

NARA's mission is to promote the health and safety of children and adults in regulated settings. One of our primary roles to achieve this mission is to strengthen the knowledge and skills of regulators charged by their States, Provinces, and Territories with the responsibility to protect and preserve the health, safety, and well-being of children and adults, especially those in vulnerable populations.

Equally important, NARA provides program administrators, managers, and personnel an avenue through extensive technical assistance, training, credentialing, resources, and networking that safeguards and enriches the lives of those served in regulated settings.

In an effort to fully prepare human service regulators to accomplish the requirements of their role at the micro and macro levels, NARA has utilized a comprehensive, multi-dimensional approach to develop tools and resources to strengthen concepts and practices in the regulatory profession.

To that end, "The Model Family Foster Home Licensing Standards" were developed in 2013 in collaboration with The American Bar Association, Center on Children and the Law, Generations United, with support from the Annie E. Cassie Foundation. These partners share the NARA vision of "Consumer Protection through Prevention" to ensure children in foster care are safe while also establishing a reasonable, common-sense pathway to enable more relatives and non-related caregivers to become licensed foster parents. These national standards are the first of their kind to provide a set of clear and practical requirements that serve as guidance for entities in their efforts to create family foster home licensing standards in order to license family foster homes.

In keeping with NARA's goal to develop effective human care regulations to ensure the health and safety of children and adults in regulated settings, the Model Foster Care Standards have been reviewed and revised in keeping with recommended best practices and to accommodate the enactment of new laws. These revisions include the interface of diligent recruitment requirements, information on the reasonable and prudent parenting standard and best practice changes in the recommended capacity for a family foster home.

The following are the highlighted revisions reflected in the attached updated Model Licensing Standards:

| 5. CAPACITY STANDARDS |
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| A. The total number of children in a family foster home, including the family's own children living in the home, must not exceed 8, of which no more than 5 6 may be children in foster care. The agency may must determine lower capacities based on the family assessment and home study. |
| 1. No more than 3 children total under age 2. |
| 2. No more than 4 children total under age 5. |
| 3. No more than 4 children total between the ages of 5-13. |
| 4. No more than 4 children total over the age of 13. |
| B. The maximum numbers of children may be increased with agency approval to allow siblings to remain together or to allow applicants to provide care to a child who has an established, meaningful relationship with the applicants' family, such as a child who was formerly in foster care with the family.: |
| 1. To allow a parenting youth in foster care to remain with the child of the parenting youth. |
| 2. To allow siblings to remain together. |
| 3. To allow a child with an established meaningful relationship with the family to remain with the family. |
| 4. To allow a family with special training or skills to provide care to a child who has a severe disability. |
| 12. Assurances from Applicants |
| Addition to the assurances section: |
| 13. They will adhere to the reasonable and prudent parent standard. |

NARA acknowledges that not all states will be able to implement this model in its entirety without any modifications, we challenge all states to use it to assess their own standards and ultimately to align their standards with guidance from this model. For the development and implementation of tribal foster care standards, please refer to the National Indian Child Welfare Association (NICWA) materials at <http://www.nicwa.org/resources/booklets/>.

Please feel free to let us know if you have any questions or if you would like any additional information.

Thank you.

With warmest regards,

Jim Murphy
Executive Director

Cc: David Kelly, Federal Project Officer Child Welfare Program Specialist for Court Improvement, ACF