

U.S. Department of Health and Human Services (HHS)
Administration for Children and Families (ACF)
Administration on Children, Youth and Families (ACYF)
Children's Bureau (CB)
Supporting America's Children and Families Act Tribal Consultation Report
July 15, 2026

This report is written in accordance with the ACF Tribal Consultation Policy, which requires a written report after the completion of consultation. The official record for Tribal letter submission was open until March 11, 2026, through TribalConsultationACYF@acf.hhs.gov. This report summarizes Tribal recommendations gathered through multiple consultation channels, including written submissions from 20 Tribes; oral testimony and discussion during in-person consultation sessions; and comments shared during virtual consultation sessions and related chat-based engagement. The report is published on the CB "Tribes" page: <https://acf.gov/cb/focus-areas/tribes>.

BACKGROUND INFORMATION

The HHS and ACF Tribal Consultation Policies ensure that Tribal leaders have meaningful opportunities to engage and provide input when a federal action may significantly affect one or more Tribes ([HHS Tribal Consultation Policy](#) and [ACF Tribal Consultation Policy](#)). In addition, the [Supporting America's Children and Families Act](#) (the Act) reinforces this requirement by statutorily requiring Tribal consultation.

During late 2025 and early 2026, organizational changes within ACF resulted in the transition from the ACF Tribal Engagement Team to the establishment of the Children's Bureau (CB) Tribal Cross-Functional Team (TCFT). The TCFT was created to strengthen coordination and collaboration on Tribal child welfare matters across all CB programs and to provide a more integrated and consistent approach to Tribal engagement.

In accordance with the HHS Tribal Consultation Policy, CB designated Nanette Bishop as its primary point of contact for Tribal consultation matters. In this role, she advises CB leadership and staff on matters pertaining to Tribal consultation and serves as the primary point of contact for Tribal officials seeking to consult with CB (nanette.bishop@acf.hhs.gov).

Through discussions with Tribal communities and the ACF Tribal Advisory Committee (TAC), ACF determined that consultations would be held in multiple locations, including alongside other Tribal meetings where appropriate, and supported by at least two virtual participation options. Consultation sessions were scheduled in Onamia, Minnesota; Chandler, Arizona; Rapid City, South Dakota; Anchorage, Alaska; Seattle, Washington; and Washington, D.C. Due to the federal government shutdown, the consultation sessions planned for South Dakota and Alaska were canceled.

NOTIFICATION OF CONSULTATION

After discussion with TAC, ACF announced consultation opportunities through Dear Tribal Leader Letters (DTLL) issued on July 25, 2025, and August 14, 2025. The letters identified consultation dates, purpose, locations, virtual options, and registration information and included background materials such as an Information Memorandum, Summary of Provisions, Framing Questions, and Side-by-Side Comparison of the old bill to the new bill. Following Tribal feedback during the Minnesota session on August 25, 2025, ACF expanded the framing questions for subsequent consultation sessions to invite input on all relevant sections of the Act.

CONSULTATION AGENDA

The consultation agenda was informed by Tribal input and used as the template for all subsequent 2025 and 2026 consultation sessions. The agenda included an opening, invitation for prayer, announcements, opening remarks, presentation, invitation for remarks and discussion, and closing.

Final topics for the consultation included:

- Indian Child Welfare Act (ICWA) Technical Assistance
- Reducing Administrative Burdens
- Title IV-B, Subpart 2 Definitions and Plan Requirements
- Administrative Costs
- Court Improvement Program (CIP)
- Title IV-E Prevention Services Clearinghouse

PARTICIPANTS AND SUBMISSIONS

This report reflects input gathered through multiple consultation channels, including written submissions from 20 Tribes; oral testimony and discussion during in-person consultation sessions; and comments shared during virtual consultation sessions and related chat-based engagement. All available inputs were reviewed collectively and synthesized so that recurring issues were grouped and elevated. *Appendix 1* lists Tribal written submissions and *Appendix 2* includes consultation participants and attendees.

ACF OVERARCHING RESPONSE

ACF appreciates the thoughtful input shared by Tribes throughout this consultation and values the opportunity to engage in meaningful government-to-government dialogue. Across written submissions and consultation sessions, Tribal feedback underscored the importance of consistent, coordinated, and responsive engagement; reduced administrative burden; strengthened ICWA implementation; and meaningful recognition of Tribal sovereignty and Tribal data governance.

In response, ACF has strengthened internal coordination through the establishment of the CB TCFT, which brings together staff across CB to promote a more aligned and integrated approach to Tribal engagement. This effort reflects ACF's commitment to ensuring that

CB's work is informed by Tribal priorities, responsive to Tribal feedback, and respectful of Tribal sovereignty.

ACF is also working to reduce administrative burden and streamline program requirements, including efforts to simplify Title IV-B planning and reporting processes. Recent statutory changes under Public Law 118-258 provide new opportunities to better align requirements with Tribal capacity and reduce duplicative or unnecessary reporting while maintaining accountability and program integrity.

Under the leadership of ACF Assistant Secretary Alex Adams, ACF has already undertaken a comprehensive review of administrative processes across programs to identify opportunities to reduce burden, streamline requirements, and improve alignment, while maintaining accountability and program integrity. In the February 19, 2026, [Fact Sheet: ACF's Approach to Streamlining Sub-Regulatory Guidance](#), ACF outlined the process taken to classify obsolete versus necessary guidance, which resulted in a reduction of 74% of ACF's sub-regulations. ACF is committed to implementing these changes thoughtfully and in partnership with Tribes.

ACF remains committed to ongoing engagement with Tribes to ensure that policies, programs, and technical assistance efforts reflect Tribal perspectives and lived experience. Feedback received through this consultation will continue to inform ACF's work moving forward. ACF will continue to listen, learn, and adapt based on Tribal input, with the goal of supporting strong, culturally grounded child welfare systems that serve Tribal children, families, and communities.

IMPLEMENTATION ROLES AND RESPONSIBILITIES:

Many of the recommendations received through this consultation relate to responsibilities that are shared among the federal government, states, Tribal governments, courts, and other partners. While ACF plays an important role in administering federal child welfare programs, issuing guidance, providing technical assistance, collecting and analyzing data, and overseeing implementation of federal statutory requirements, many aspects of child welfare practice and court administration are carried out by state agencies, Tribal governments, and state and Tribal courts under their respective legal authorities.

ACF supports implementation in a variety of ways. In some instances, ACF provides technical assistance directly through federal guidance, consultation, joint planning, oversight, and interagency coordination. In other instances, ACF funds national resource centers, cooperative agreements, discretionary grants, and other technical assistance providers that work directly with Tribes, states, courts, and child welfare agencies to build capacity and strengthen implementation. Together, these complementary approaches support effective implementation of federal child welfare programs while recognizing the distinct roles and responsibilities of federal, state, Tribal, and judicial partners.

The responses in this report reflect ACF's roles and responsibilities under federal law. Where recommendations involve matters outside ACF's direct authority, the responses

describe how ACF can support implementation through guidance, technical assistance, collaboration, data collection and analysis, oversight, and continued government-to-government engagement with Tribes.

SUMMARIES OF TOPICS AND RESPONSES

TOPIC 1: ICWA Technical Assistance (Public Law 118–258)

The ICWA establishes federal requirements to protect the best interests of Indian children and promote the stability and security of Indian Tribes and families. Public Law 118–258 amended certain ICWA provisions and reinforced the federal government’s role in supporting consistent and effective implementation of the law. CB provides technical assistance and guidance in understanding and carrying out ICWA requirements to support Tribes, states, courts, and other partners. This topic focuses on ACF’s role in providing technical assistance specific to ICWA implementation and ensuring that available supports align with statutory requirements and Tribal child welfare systems.

ICWA technical assistance was one of the most frequently recurring areas of Tribal feedback. Tribal feedback related to Topic 1 emphasized that effective implementation depends on earlier identification of Indian children, timely and complete notice, culturally grounded training, stronger active-efforts practice, meaningful Tribal participation, increased capacity, and stronger accountability across systems.

Recommendations

1.1 – Timely Identification of Indian Children, Notice to Tribes and Tribal Engagement

High-Level Summary: This area focuses on the need to strengthen ICWA implementation through earlier Tribal engagement, improved notice practices, and clearer procedural guidance. Tribal recommendations consistently highlighted delayed identification of Tribal children and late or incomplete notice to Tribes as significant barriers, often limiting Tribal ability to intervene, identify kinship placements, and influence critical case decisions. Tribes emphasized the importance of initiating inquiry into Tribal identification at the time children are taken into care and custody, clearly distinguishing between inquiry and formal notice requirements, and ensuring timely, accurate communication supported by up-to-date Tribal contact information. Further feedback highlighted that notice to Tribes is frequently treated as a one-time procedural requirement rather than an ongoing engagement process, reducing opportunities for meaningful collaboration. This input emphasized early, consistent, and relationship-centered engagement as essential to upholding Tribal sovereignty, preserving family and cultural connections, and ensuring ICWA compliance.

Recommendation 1: Require ICWA inquiry and Tribal engagement to occur at intake and prior to case filing whenever a potential Tribal relationship is known.

Response: ACF recognizes the importance of early identification of Indian children and early engagement with Tribes in child welfare proceedings. ACF agrees that timely inquiry

and Tribal involvement are critical to supporting effective ICWA implementation, preserving Tribal sovereignty, and ensuring that Tribes have meaningful opportunities to participate in decisions affecting their children and families.

Through the development of the ICWA technical assistance plan, ACF will continue to support states, courts, and Tribes in strengthening practices related to early inquiry, Tribal engagement, timely notice, and collaboration throughout the life of a case.

Recommendation 2: Improve the timeliness, accuracy, and completeness of notice to Tribes, including use of correct Tribal contacts and inclusion of sufficient identifying information.

Response: ACF shares the goal of improving the timeliness, accuracy, and completeness of notice to Tribes and recognizes that effective notice is foundational to meaningful Tribal participation and compliance with ICWA.

ACF agrees that timely notice is a critical measure of effective ICWA implementation and will continue to strengthen ICWA-specific training and technical assistance for state agencies and courts. This includes consideration of model notice procedures, practical tools, and guidance designed to promote timely communication, use of current Tribal contact information as found in the Federal Register, and inclusion of information necessary for Tribes to determine a child's Tribal affiliation and respond appropriately.

Recommendation 3: Clarify the distinction between ICWA inquiry and formal notice through federal guidance and technical assistance.

Response: ACF recognizes the importance of clearly distinguishing between ICWA inquiry and formal notice requirements and understands that confusion between these processes can create delays and barriers to effective implementation. In the ICWA context, **inquiry** and **formal notice** are related but distinct legal obligations, and Tribes raise appropriate concerns that states may conflate the two.

ICWA inquiry is the process of asking whether a child is, or may be, an Indian child. It begins early in a child welfare case, ideally at first contact or intake, and continues throughout the proceeding as new information becomes available. The purpose of the inquiry is to determine whether ICWA may apply.

Formal ICWA notice is a separate legal requirement that applies when there is reason to know a child is an Indian child. Notice must be provided to the child's Tribe (and, in certain circumstances, the Bureau of Indian Affairs) in accordance with ICWA's statutory and regulatory requirements, so the Tribe has an opportunity to determine the child's membership or eligibility, intervene in the proceeding, or request transfer of jurisdiction.

ACF will continue to consider opportunities through guidance, training, and technical assistance to improve understanding of these requirements among state agencies, courts,

and other partners. This includes strengthening ICWA-specific training and resources that support consistent application of inquiry and notice requirements and promote meaningful engagement with Tribes throughout child welfare proceedings.

1.2 – ICWA Training, Active Efforts, and Qualified Expert Witness (QEW) Capacity

High-Level Summary: This set of responses centers on the need to improve the consistency, quality, and cultural integrity of ICWA implementation through strengthened training and practice standards. Tribal recommendations identified widespread gaps in ICWA understanding across courts, agencies, and legal professionals as a primary driver of noncompliance, emphasizing that current training approaches are often inconsistent, one-time, and insufficiently grounded in Tribal perspectives. Tribes recommended sustained, role-specific training developed in partnership with Tribal subject matter experts, which incorporates historical context, Tribal sovereignty, culturally responsive practices, and clear distinctions between active and reasonable efforts. Feedback underscored the need for clearer expectations and accountability standards for active efforts, as well as enhanced infrastructure and Tribal partnership to support QEWs. Collectively, input emphasized comprehensive, Tribally informed training and practice alignment as foundational to strengthening ICWA compliance and improving outcomes for children and families. In response, ACF affirms the importance of these elements, highlighting ongoing training, technical assistance, and collaboration with Tribal courts and partners as key strategies to promote accurate, culturally responsive, and legally sound ICWA practice.

Recommendation 4: Require comprehensive, mandatory ICWA training, developed by native-lead entities, for state child welfare staff, judges, attorneys, and court personnel that includes content on historical trauma, Tribal sovereignty, and culturally responsive practices.

Response: ACF recognizes the importance of comprehensive ICWA training for state child welfare staff, judges, attorneys, and court personnel and values the recommendation that such training be informed by Tribal expertise and perspectives.

ACF agrees that effective ICWA implementation depends on a strong understanding of Tribal sovereignty, historical context, culturally responsive practice, active efforts, and other core ICWA requirements. While ACF's authority to mandate training requirements is limited, ACF will continue to support and promote ICWA-specific training and technical assistance for courts, public child welfare agencies, and other partners. This includes encouraging training approaches that are ongoing, role-specific, Tribally informed, and developed in partnership with Tribal subject matter experts.

ACF also acknowledges that Tribal leaders, Tribal courts, and Tribal child welfare professionals play an important role in the development and delivery of training that strengthens ICWA implementation and improves outcomes for Tribal children and families.

Recommendation 5: Clarify and strengthen requirements for culturally appropriate active efforts distinct from reasonable efforts.

Response: ACF recognizes that active efforts are a foundational component of ICWA and are intended to prevent the unnecessary breakup of Indian families. ACF agrees that active-efforts requirements must be clearly understood, consistently applied, and distinguished from reasonable-efforts standards. This is another area where states may conflate the two.

Reasonable efforts are the general child welfare requirement to make efforts to prevent the removal of a child from the home or to reunify a family. These efforts apply broadly in child welfare cases and are intended to support family preservation and reunification.

Active efforts under ICWA are a higher standard that require affirmative, thorough, timely, and culturally appropriate actions to prevent the breakup of an Indian family. Active efforts emphasize working collaboratively with the child's family and Tribe, helping families access services, and incorporating Tribal culture, resources, and community supports throughout the case.

Reasonable efforts generally require agencies to make services available to families, whereas active efforts require agencies to actively assist families in accessing and successfully using those services, while partnering with Tribes and incorporating culturally appropriate supports. The distinction is important because active efforts are not simply "more" reasonable efforts. They require a more engaged, collaborative approach that reflects the purpose of ICWA: to prevent the unnecessary breakup of Indian families and preserve Tribal relationships and cultural identity.

Through technical assistance, training, and implementation support, ACF will continue to clearly distinguish the two standards, rather than treating active efforts as synonymous with, or only an enhanced version of, reasonable efforts to promote a greater understanding of active-efforts requirements among state agencies, courts, and other partners. ACF also recognizes the importance of ensuring that active efforts are implemented in a manner that is culturally responsive and informed by Tribal perspectives. ACF agrees that active-efforts requirements must be clearly understood, consistently applied, and distinguished from reasonable-efforts standards.

Recommendation 6: Develop standardized templates and guidance for documenting active efforts alongside targeted training and funding to expand the availability of culturally appropriate QEWs, to strengthen accountability and support high-quality QEW testimony.

Response: ACF recognizes the importance of clear documentation and consistent practice in supporting effective ICWA implementation. ACF agrees that documentation of active efforts is an important indicator of effective implementation, accountability, and continuous improvement.

Through the ICWA technical assistance plan, ACF will consider opportunities to support practical tools, standardized resources, training, and guidance that assist states, courts, and Tribes in documenting active efforts and strengthening implementation. ACF also recognizes the important role QEWs play in ICWA proceedings and the need to support capacity-building efforts that increase access to culturally appropriate QEWs.

In addition, implementation of the ICWA-related Adoption and Foster Care Analysis and Reporting System (AFCARS) data elements is expected to promote more standardized collection of information related to key ICWA requirements, including active efforts. Over time, these data will support a better understanding of state implementation practices, help identify opportunities for technical assistance, and strengthen accountability by providing more consistent information about ICWA implementation across jurisdictions.

Recommendation 7: Require Tribal involvement in the identification, selection, and support of QEWs.

Response: ACF recognizes the important role Tribes play in identifying and supporting QEWs and appreciates this recommendation. Tribal involvement helps ensure that QEW testimony reflects Tribal knowledge, cultural context, and the unique circumstances of Tribal children and families.

ACF will consider this recommendation as part of ongoing ICWA technical assistance planning and implementation efforts. ACF recognizes the value of strengthening collaboration with Tribes in the identification, development, and support of QEWs to promote effective and culturally informed ICWA practice.

1.3 – ICWA Accountability, Jurisdictional Transfers, and Federal Coordination

High-Level Summary: This area emphasizes the need to strengthen system-level accountability, oversight, and coordination to support effective ICWA implementation. Tribal feedback consistently called for clearer federal guidance, stronger accountability mechanisms, and more direct pathways for Tribes to elevate concerns regarding state and county practices to the federal government. Tribes also highlighted the importance of consistent data use and reporting structures to track compliance and outcomes. Tribes emphasized that insufficient incorporation of Tribal perspectives in QEW selection, jurisdictional transfer decisions, and compliance oversight undermines ICWA implementation. Feedback also raised concerns that states and counties may receive federal financial support without demonstrable compliance or meaningful consultation with Tribes, highlighting gaps in oversight and enforcement. ACF recognizes strengthening these system-level supports as essential to ensuring transparent, responsive, and accountable ICWA implementation across jurisdictions.

Recommendation 8: Strengthen guidance and accountability for transfers of jurisdiction to Tribal courts under ICWA.

Response: ACF recognizes the importance of supporting timely and appropriate transfers of jurisdiction to Tribal courts under ICWA. ACF agrees that jurisdictional transfers are an important indicator of effective ICWA implementation and Tribal participation in child welfare proceedings.

ACF is committed to strengthening guidance, technical assistance, and collaboration to support states and Tribes in building the knowledge, capacity, and practices needed to implement these provisions effectively.

ACF recognizes that implementation of the ICWA-related Adoption and Foster Care Analysis and Reporting System (AFCARS) data elements will support more standardized collection of information related to key ICWA requirements, including jurisdictional transfers. As this data becomes available, ACF will use them, together with other available information, to better understand implementation trends, inform technical assistance, support ongoing program improvement, and strengthen accountability.

ACF also recognizes the importance of incorporating Tribal perspectives when interpreting this data and identifying opportunities to strengthen ICWA implementation.

Recommendation 9: Consider allowing Tribes to work directly with the federal government to receive funds so that states that are negligent in meeting with Tribes for consultation, cannot collect administrative costs.

Response: ACF recognizes the concerns reflected in this recommendation and the importance of meaningful consultation and collaboration between states and Tribes in the administration of child welfare programs.

ACF acknowledges that Tribal engagement is a critical component of effective program implementation and will continue to support efforts that strengthen Tribal participation, joint planning, and government-to-government relationships. ACF recognizes the value of funding approaches that support Tribal capacity and self-determination and will continue to consider Tribal feedback as implementation of Public Law 118-258 moves forward.

ACF also notes that eligible Tribes have the opportunity to apply directly to the CB for Title IV-B and Title IV-E funding, allowing them to administer these programs directly rather than relying on state pass-through funding. For Tribes interested in pursuing direct funding, ACF is committed to providing technical assistance and support throughout the application and implementation process.

Recommendation 10: Convene regular meetings with Tribes to address challenges with state/county compliance under ICWA and establish a formal mechanism for Tribal child welfare agencies to report concerns directly to the federal government for accountability.

Response: ACF recognizes the value of ongoing engagement with Tribes regarding challenges in ICWA implementation, including concerns related to state and county compliance.

Through the TCFT, ACF has strengthened internal coordination and created additional opportunities to elevate Tribal concerns across the CB. ACF will continue to explore mechanisms that support ongoing communication with Tribes and help identify implementation challenges, emerging issues, and opportunities for improvement.

ACF agrees that regular engagement is important to strengthening accountability, collaboration, and effective implementation of ICWA.

Recommendation 11: ACF should establish a nationwide ICWA coordinator to facilitate communication between all entities.

Response: ACF appreciates this recommendation and recognizes the value of coordinated communication and consistent support for ICWA implementation across jurisdictions.

ACF agrees that effective coordination among Tribes, states, courts, and federal partners is essential to successful implementation of ICWA. Within its statutory authorities, ACF will continue to strengthen coordination through guidance, technical assistance, and collaboration with Tribes, states, courts, and other federal partners. ACF also recognizes the distinct roles and responsibilities of the Bureau of Indian Affairs and other federal agencies in supporting ICWA implementation and is committed to continuing to strengthen interagency collaboration to promote consistent and effective implementation of the law.

Recommendation 12: ACF, through regulation, should require states to report annually on their plans to ensure compliance with ICWA. This report should specifically address how states are providing notice, adhering to placement preferences, and delivering active efforts. Where gaps in compliance are identified, states should be required to outline clear, actionable plans for improvement. These requirements should be aligned with, and reinforced by, the implementation of the ICWA AFCARS final rule.

Response: ACF recognizes the importance of transparency, accountability, and consistent information regarding state implementation of ICWA.

Public Law 118-258 established new requirements related to state reporting and federal oversight of ICWA implementation, including state plan requirements addressing timely notice, active efforts, and case recordkeeping, as well as biennial reporting to Congress on state compliance. In addition, implementation of the ICWA-related AFCARS data elements is expected to provide more standardized information about state implementation of ICWA requirements. This data will support the development of reports that help assess implementation of key ICWA provisions, identify trends, and better understand outcomes for Tribal children served by state child welfare systems.

ACF will continue to consider how state reporting, ICWA-related AFCARS data, and technical assistance can be used together to strengthen implementation, improve accountability, and identify opportunities for continuous improvement. ACF also recognizes the importance of ensuring that Tribal perspectives help inform ongoing assessment of ICWA implementation.

TOPIC 2: Reducing Administrative Burdens

ACF administers a wide range of child welfare and family support programs that include statutory, regulatory, and reporting requirements. This topic addresses ACF's ongoing efforts to consider administrative burden in program design and implementation, particularly as it affects Tribes.

As previously stated, under the leadership of ACF Assistant Secretary Alex Adams, ACF has undertaken significant efforts to review administrative processes across programs with the goal of identifying opportunities to reduce burden, streamlining requirements, and improving alignment with administration priorities, while maintaining accountability and program integrity. ACF outlines the process taken to classify obsolete versus necessary guidance, which resulted in a reduction of 74% of ACF's sub-regulations in the February 19, 2026, [Fact Sheet: ACF's Approach to Streamlining Sub-Regulatory Guidance](#).

Tribal feedback related to Topic 2 emphasized that reducing duplication, improving usability, and scaling requirements to capacity are necessary to allow Tribal child welfare staff to focus on direct services.

Recommendations

2.1 – Proportional Reporting and Child and Family Services Plan (CFSP) / Annual Progress and Services Report (APSR) Requirements

High-Level Summary: This area addresses CFSP and APSR reporting, including duplicative narrative requirements, cumulative fifth-year summaries, and proportional requirements for Tribes receiving smaller Title IV-B awards. Tribes consistently described federal reporting requirements as overly complex and misaligned with Tribal program size and funding levels. Many noted that the time and cost associated with reporting can exceed the funding received, particularly for smaller Tribes. Feedback emphasized the need for proportional reporting that focuses on key statutory elements without duplicative or low-value requirements. Simplifying reporting was viewed as essential to allowing Tribal staff to prioritize direct services.

Recommendation 1: Streamline Child and Family Services Plan (CFSP) and Annual Progress and Services Report (APSR) requirements for Tribes by limiting reporting to applicable statutory elements and eliminating duplicative narrative requirements, including cumulative year-five summaries.

Response: ACF appreciates this recommendation and shares the goal of reducing administrative burden associated with CFSP and APSR requirements, including the cumulative burden associated with multi-year and fifth-year APSR reporting. Public Law

118-258 provides new opportunities to reassess and streamline reporting expectations for Tribes receiving Title IV-B funds.

As part of implementation, ACF has conducted a rigorous review of sub-regulatory guidance and has significantly adjusted Title IV-B-1 and Title IV-B-2 reporting requirements in the FY [2027 Program Instructions](#). These changes represent an initial step toward reducing burden while maintaining accountability and program integrity.

ACF will continue to review Title IV-B CFSP and APSR requirements, including those established through regulation, and multi-year reporting structures, to identify elements that may not apply to Tribes or provide limited value or create duplicative or cumulative reporting. These efforts are intended to align requirements more closely with statutory intent, reduce unnecessary burden, and maintain essential programmatic and statutory accountability.

Recommendation 2: Scale Title IV-B reporting requirements based on funding level and Tribal capacity.

Response: ACF appreciates this recommendation and shares the goal of reducing administrative burden for Tribes with varying capacity. Public Law 118-258 provides new opportunities to streamline reporting requirements for Tribes receiving Title IV-B funds. ACF recognizes the value of integrated planning formats, Tribal-specific templates, and proportional reporting approaches in reducing burden and improving usability. ACF will continue to consider these strategies as part of ongoing efforts to streamline reporting and better align requirements with Tribal capacity and program needs.

ACF also recognizes that the administrative demands associated with planning and reporting may have a different impact on smaller Tribal programs and will continue to explore approaches that better align requirements with program size, funding level, and organizational capacity. In addition, eligible Tribes may choose to participate in the Public Law 102-477 Program, which allows certain federal funding streams, including Title IV-B, to be integrated into a single, coordinated program. For participating Tribes, this approach may provide additional flexibility and reduce administrative burden through more coordinated planning and reporting.

Recommendation 3: Allow abbreviated and less frequent reporting for Tribes receiving under \$50,000.00 in Title IV-B funds.

Response: ACF recognizes the importance of ensuring that reporting requirements are proportionate to the size of a Tribal program and the level of funding received.

Public Law 118-258 provides authority for ACF to modify Title IV-B reporting requirements for Tribes receiving \$50,000 or less in Title IV-B, Subpart 1 funding. ACF appreciates the recommendation to consider abbreviated and less frequent reporting approaches and will continue to explore opportunities to reduce administrative burden on smaller Tribal programs while maintaining essential statutory and programmatic accountability.

ACF is committed to working with Tribes to identify practical approaches that align reporting expectations with available capacity and resources.

2.2 – Forms, Templates, and Collaborative Design

High-Level Summary: This area addresses usability of reporting tools, including the CFS-101; use of checklists, assurances, and merge documents; and the role of a funded Tribal workgroup in redesigning Title IV-B reporting. Tribal input highlighted challenges with existing reporting tools, including the CFS-101, which were described as difficult to use and not tailored to Tribal needs. Tribes recommended simplified, Tribal-specific templates and alignment with other federal reporting structures to reduce duplication. There was strong support for establishing mechanisms, such as Tribal workgroups, to co-design reporting requirements. This approach was seen as critical to ensuring usability and long-term effectiveness.

Recommendation 4: Simplify and improve usability of the CFS-101 form, including development of Tribal-specific versions.

Response: ACF recognizes the importance of ensuring that reporting tools are user-friendly and responsive to Tribal program needs. ACF appreciates the recommendation to improve the usability of the CFS-101 and recognizes that Tribal-specific templates and streamlined reporting tools may help reduce administrative burden and improve the reporting experience for Tribes.

ACF will continue to consider opportunities to simplify reporting forms and improve usability as part of ongoing implementation of Public Law 118-258 and broader efforts to streamline Title IV-B reporting requirements.

Recommendation 5: Align Title IV-B reporting timelines and formats with other federal formula grant programs.

Response: ACF appreciates this recommendation and shares the goal of reducing administrative burden for Tribes, including addressing duplicative reporting requirements across federal child welfare programs. Public Law 118-258 provides new opportunities to streamline reporting for Tribes receiving Title IV-B funds.

ACF will continue to consider opportunities to better align reporting requirements, where feasible, and to reduce duplication while continuing to meet statutory and programmatic requirements.

As part of these efforts, ACF has conducted a comprehensive review of sub-regulatory guidance and significantly revised Title IV-B reporting requirements through the [2027 Program Instructions](#).

Recommendation 6: Establish a funded Tribal workgroup to review the Title IV-B report and provide coordinated recommendations back to ACF.

Response: ACF values this recommendation and recognizes the importance of engaging Tribes directly in the design and refinement of Title IV-B reporting requirements.

Public Law 118-258 creates new opportunities for collaboration and joint planning with Tribes regarding reporting and administrative burden reduction. ACF anticipates continued Tribal input on reporting structures and implementation through existing engagement mechanisms, including consultation, joint planning activities, and advisory structures.

ACF recognizes the value of coordinated Tribal feedback and will consider approaches, including workgroups and other collaborative forums, to support ongoing Tribal engagement in improving Title IV-B reporting requirements and reducing administrative burden.

2.3 – Consultation Access and Federal Capacity

High-Level Summary: This area addresses recommendations to reduce burden by improving access to consultation, locating federal engagement closer to Tribes, and ensuring regional federal capacity reflects Tribal presence. Tribes emphasized that administrative burden is also influenced by the accessibility of consultation opportunities and federal engagement. Many noted that consultation locations, travel costs, and limited regional staffing create barriers to participation. Feedback encouraged more geographically distributed consultation opportunities and increased federal presence in regions with high Tribal populations. Improving access was identified as essential to meaningful engagement.

Recommendation 7: Consultations should take place where Tribes are to allow their representatives to be present and Federal staff in regions should reflect the number of Tribes in that area.

Response: ACF recognizes the importance of ensuring that consultation opportunities are accessible to Tribes and that Tribal leaders and representatives have meaningful opportunities to participate in government-to-government dialogue.

ACF understands that travel costs, geographic distance, staffing limitations, and other logistical challenges can affect participation. As demonstrated through this consultation process, ACF has sought to provide multiple opportunities for engagement through regional consultation sessions, virtual participation options, and written comment opportunities. ACF will continue to consider how consultation locations, formats, and engagement strategies can best support participation by Tribes across diverse geographic regions.

ACF also recognizes the importance of maintaining strong Tribal engagement capacity throughout the CB. Through the TCFT and ongoing coordination with regional and headquarters staff, ACF is working to strengthen communication, responsiveness, and support for Tribal child welfare programs across the country.

TOPIC 3: Title IV-B, Subpart 2 Definitions and Plan Requirements

The Act and accompanying guidance establish definitions and planning requirements, which apply to eligible jurisdictions, including Tribes operating Title IV-B programs. ACF provides oversight, guidance, and technical assistance related to Title IV-B program requirements and plan submissions. This topic focuses on the statutory and programmatic framework governing Title IV-B, Subpart 2, and its application within Tribal child welfare systems.

Tribal feedback emphasized that definitions and planning requirements should reflect culturally grounded practices, support proportional planning, strengthen meaningful state-Tribal consultation, and promote stable funding mechanisms that align with Tribal self-governance.

Recommendations

3.1 – Culturally Grounded Practices

High-Level Summary: This area addresses recommendations to maintain and expand Title IV-B definitions so that they reflect culturally grounded Tribal child welfare practices, including kinship, family preservation, community-defined support, and culturally responsive prevention services. Tribes emphasized that child welfare services must reflect culturally grounded approaches rooted in kinship systems and community-defined support. Many noted that federal definitions do not fully capture Tribal practices, limiting the effectiveness of programs. There was strong support for maintaining flexibility and recognizing Tribal authority in service delivery. This ensures programs align with Tribal values and improve outcomes for children and families.

Recommendation 1: Maintain and expand Title IV-B definitions that reflect culturally grounded Tribal child welfare practice.

Response: ACF appreciates this recommendation and recognizes that Title IV-B funding plays an important role in supporting Tribal child welfare systems, even as many Tribes receive relatively small allocations.

ACF agrees that Title IV-B is an important source of flexible funding that can support culturally grounded family preservation efforts and strengthen Tribal self-governance. Changes made by Public Law 118-258 include provisions to reserve funding for Tribes operating Title IV-B programs, which are intended to strengthen and sustain Tribal program capacity. ACF also notes that Tribes may choose to participate in Public Law 102-477, which allows for the integration of funding, including Title IV-B Subparts 1 and 2, into a single, coordinated program. This option may provide additional flexibility for Tribes seeking to align child welfare services with broader community priorities.

3.2 – Proportionate Planning Standards

High-Level Summary: This area addresses recommendations to ensure Title IV-B plan requirements are proportionate to Tribal size, staffing, funding levels, and administrative

capacity, and that required information may be submitted through simplified tools such as checklists or assurances, where appropriate. Tribes reported that uniform planning requirements create disproportionate burden, particularly for smaller programs. Feedback highlighted the need to align requirements with Tribal capacity and funding levels while maintaining accountability. Tailored technical assistance was also identified as critical for supporting program implementation. A proportional approach was widely supported as a way to improve participation.

Recommendation 2: Ensure Title IV-B plan requirements are proportionate to Tribal size, staffing, and funding levels.

Response: ACF appreciates this recommendation and shares the goal of ensuring that Title IV-B planning and reporting requirements reflect Tribal capacity and administrative realities.

Assuring that requirements align with Tribal capacity and administrative realities is an important recommendation. ACF has been reviewing the current Title IV-B reporting requirements, including those associated with the CFSP and APSR, to identify where regulatory expectations may exceed statutory requirements. In response, ACF has made significant changes in [FY 2027 Program Instructions](#). ACF is committed to aligning planning and reporting expectations, where possible, with the scale and context of Tribal Title IV-B programs. ACF will continue to explore opportunities to provide targeted technical assistance to smaller Tribal programs and those with limited administrative capacity to support participation in Title IV-B programs.

3.3 – Self-Governance and Funding Models

High-Level Summary: This area addresses recommendations to clarify state consultation expectations and consider funding structures that provide more stability, flexibility, and alignment with Tribal self-governance, including contracts, compacts, and noncompetitive multi-year funding models. Tribes expressed concern that competitive funding structures may disadvantage smaller or resource-limited communities. Many emphasized the importance of stable, predictable funding mechanisms that support long-term planning. Feedback highlighted growing interest in self-governance approaches, such as compacts and contracts. These models were viewed as better aligned with Tribal sovereignty and operational needs.

Recommendation 3: Strengthen state consultation requirements on Title IV-B plans and reporting.

Response: ACF recognizes the importance of meaningful consultation and collaboration between states and Tribes in the development, implementation, and oversight of Title IV-B programs.

Public Law 118-258 continues to emphasize the importance of Tribal engagement in child welfare planning and implementation. ACF agrees that strong consultation practices can

support more effective service delivery, strengthen government-to-government relationships, and improve outcomes for Tribal children and families.

ACF will continue to provide guidance, technical assistance, and support related to consultation and joint planning requirements and will consider Tribal feedback regarding opportunities to strengthen collaboration between states and Tribes in Title IV-B planning and reporting processes.

Recommendation 4: Consider administering Tribal child welfare funding through self-governance mechanisms, such as contracts or compacts, rather than distributed through competitive processes.

Response: ACF appreciates this recommendation and recognizes the concerns raised about competitive funding models requiring Tribes to compete for limited child welfare resources.

ACF acknowledges that, in some cases, funding structures are defined by statute, including limitations on total funding available and how funds may be distributed. These constraints can affect how funding opportunities are designed and awarded. ACF will continue to consider these concerns in the development and implementation of funding approaches, while working within statutory requirements.

ACF also recognizes the interest expressed by Tribes in funding approaches that provide greater flexibility, predictability, and alignment with Tribal self-governance principles.

TOPIC 4: Administrative Costs

Federal child welfare program requirements include provisions governing the use of funds for administrative activities. Administrative cost policies are intended to ensure appropriate use of federal funds while supporting program operations, oversight, and accountability. ACF is responsible for administering these requirements consistent with statutory authority and applicable regulations. This topic addresses the structure and purpose of administrative cost provisions within ACF-administered programs and their role in supporting effective program management.

Tribal input on administrative costs emphasized that small awards can be difficult to administer when planning, reporting, staffing, and compliance requirements consume a large share of available funding. Tribes consistently noted that administrative demands can outweigh the benefit of funding, limiting resources available for direct services. Feedback supported approaches that align administrative requirements with award size, increased flexibility, and reduced burden while maintaining accountability. Tribes also emphasized the importance of stable funding and direct funding mechanisms, including self-governance models, to support program continuity and better reflect Tribal capacity and operational realities.

Recommendations

Recommendation 1: Align administrative and reporting costs with Title IV-B funding levels so compliance costs do not exceed benefits.

Response: ACF appreciates this recommendation and recognizes that flexibility in covering administrative costs is critical for Tribes operating Title IV-B programs, particularly given the relatively small size of many Tribal allocations. Public Law 118-258 provides new flexibility by allowing Tribes to apply their federally negotiated indirect cost rate in place of the administrative cost cap for Title IV-B, Subpart 1. ACF intends to implement this provision in a manner that minimizes administrative burden.

For Title IV-B, Subpart 2, Tribes continue to have flexibility to determine the portion of funds used for administrative costs, consistent with program requirements, but noting the importance of most funding supporting services rather than administrative costs.

Recommendation 2: Increase base and stable funding for Tribal child welfare programs.

Response: ACF recognizes the importance of stable and predictable funding for Tribal child welfare programs and appreciates the recommendation. Title IV-B provides an important source of flexible funding that supports Tribal child welfare services and family preservation efforts.

Changes made by Public Law 118-258 include provisions to reserve funding for Tribes operating Title IV-B programs, which are intended to strengthen and sustain Tribal program capacity. ACF recognizes that stable funding supports long-term planning, workforce development, and continuity of services for Tribal children and families.

Recommendation 3: Provide direct Tribal child welfare funding through Indian Self-Determination and Education Assistance Act (ISDEAA) contracts or compacts.

Response: ACF recognizes the importance of Tribal self-governance and appreciates the recommendation to explore funding approaches that provide Tribes with greater flexibility, stability, and direct program administration.

ACF understands that funding mechanisms that support Tribal self-determination are important considerations for many Tribes. At the same time, Title IV-B funding is governed by federal statute, which establishes how the program is administered and how funds may be awarded. Changes to the underlying funding structure would require statutory action.

Within existing statutory authorities, eligible Tribes may apply directly to the CB to operate Title IV-B programs and receive funding directly from ACF rather than through state pass-through arrangements. ACF is committed to supporting Tribes interested in direct program administration by providing technical assistance throughout the application and implementation process.

ACF will continue to consider Tribal feedback regarding self-governance approaches and opportunities to strengthen Tribal control and flexibility within existing statutory authorities.

TOPIC 5: Court Improvement Program (CIP)

CIP provides funding to support improvements in court handling of child welfare cases, including foster care and adoption proceedings. The program is designed to promote timely, well-informed judicial decision-making and enhance legal representation to improve outcomes for children and families. ACF administers CIP funding and provides guidance and technical assistance specific to program implementation. This topic focuses on the purpose of CIP and its relevance to child welfare systems, including the role of courts in achieving safety, permanency, and well-being outcomes.

Tribal input on CIP focused on court capacity, ICWA implementation in court proceedings, remote participation, technology access, practical court tools, and attorney support. Tribes emphasized that effective court improvement must account for Tribal jurisdiction, Tribal participation, and geographic barriers to participation.

Recommendations

5.1 – Court Capacity, Funding, and ICWA Training

High-Level Summary: This area addresses Tribal feedback on funding levels, award structure, specialized courts, and ICWA-trained judicial personnel. Tribes stated that court improvement needs vary based on Tribal court capacity, caseload, geography, and local context. Input supported increased or tiered funding to better reflect those differences. Tribes also recommended ICWA-specific or specialized courts and ICWA-trained benches to improve consistency and quality of judicial decision-making. This feedback reflects the importance of state court systems that understand and uphold Tribal participation and jurisdiction under ICWA.

Recommendation 1: Increase the Tribal CIP award ceiling and adopt tiered or formula-based awards.

Response: ACF appreciates this recommendation and recognizes that funding needs vary across Tribes based on caseload, court capacity, and local context.

ACF notes that the current CIP funding structure is largely determined by statute. Public Law 118-258 increased the set-aside from mandatory appropriations for Tribal Court Improvement Program (TCIP) grants to \$2 million, supporting Tribal courts in improving the handling of child welfare and ICWA cases. In addition, TCIP discretionary grants are awarded on a competitive basis.

Within these parameters, ACF will consider this recommendation as part of future planning, including in the development of TCIP funding opportunities. The new Tribal CIP forecast was released April 20, 2026, and can be viewed at:

<https://simpler.grants.gov/opportunity/d26c02fb-606a-4bcf-bb95-a6c368e46caa>

Recommendation 2: A Tribe recommended that ACF consider the cumulative burden on Tribes with limited staff who must participate in multiple court proceedings across counties and states when designing program requirements and technical assistance approaches.

Response: ACF appreciates this recommendation and recognizes the cumulative burden on Tribal staff who may be required to participate in multiple court proceedings across jurisdictions.

ACF acknowledges that these demands can have a significant impact on Tribal capacity. Consideration of these realities will inform ongoing efforts to design program requirements, technical assistance strategies, and engagement approaches that are responsive to Tribal capacity and seek to reduce unnecessary burden while supporting effective participation in ICWA-related proceedings.

Recommendation 3: Expand ICWA-specific or specialized courts and ICWA-trained benches.

Response: ACF recognizes that specialized knowledge of ICWA can support more consistent judicial decision-making and improve outcomes for Tribal children and families. ACF appreciates this recommendation and recognizes the importance of ensuring that state courts understand and uphold Tribal participation and jurisdiction consistent with ICWA. ACF will support efforts to strengthen ICWA implementation within court systems through ICWA-specific training for judges and attorneys, practical court resources, and collaboration with CJP partners.

5.2 – Remote Participation and Court Technology

High-Level Summary: This area addresses Tribal recommendations for accessible remote participation, broadband and secure technology, and standardized tools for remote ICWA hearings. Tribes emphasized that remote participation could improve access when it is free, reliable, secure, and designed with Tribal participation in mind. Input also identified broadband gaps and limited technology infrastructure as barriers to meaningful participation in court proceedings. Tribes recommended standardized checklists and practical resources to ensure judges address core ICWA requirements during remote hearings. The feedback reflects a need for technology-enabled access that strengthens procedural consistency rather than creating new barriers.

Recommendation 4: Ensure remote court participation is accessible, free, and designed with Tribal participation in mind.

Response: ACF appreciates this recommendation and recognizes the importance of ensuring that state courts understand and uphold Tribal participation and jurisdiction consistent with ICWA.

ACF will continue to support efforts to strengthen ICWA implementation within court systems through technical assistance and collaboration with CIP partners. This includes ongoing support through the Center for Legal and Judicial Innovation and Advancement (CLJIA), which provides technical assistance and resources to courts on child welfare practice and judicial improvement. These efforts may include ICWA-specific training for judges and attorneys; development of practical resources such as checklists, model court orders, and guidance on inquiry and timely notice; and support for protocols that facilitate remote and hybrid participation. ACF also recognizes the importance of fostering Tribal-state court collaboration through peer learning and shared problem-solving.

Recent changes under Public Law 118-258 include new opportunities to support technological improvements that can enhance remote hearings and continuity of court operations. ACF will consider how these resources, together with technical assistance provided through CLJIA and other partners, can help courts strengthen access, Tribal participation, and effective implementation of ICWA.

Recommendation 5: Provide funding for broadband, secure technology, and training to support Tribal participation in court proceedings.

Response: ACF appreciates this recommendation and recognizes that broadband limitations and technology barriers can significantly affect full participation in court proceedings, including by attorneys and QEWs.

ACF will explore opportunities, within existing authorities, to support improvements in technology access for Tribal courts. Public Law 118-258 also provides new opportunities to support technological enhancements that can strengthen remote participation.

This recommendation will be considered in future planning, including in the development of discretionary funding priorities.

Recommendation 6: Develop and implement a standardized checklist for use during remote hearings to guide judges through core ICWA requirements and ensure documentation compliance.

Response: ACF recognizes the value of practical tools that support consistent implementation of ICWA during court proceedings, including remote hearings.

ACF agrees that checklists and other implementation resources may help courts address key ICWA requirements, including inquiry, notice, active efforts, Tribal participation, jurisdictional transfers, and placement preferences. As part of ongoing ICWA technical assistance and CIP efforts, ACF will consider opportunities to develop and share practical resources that support consistent and effective ICWA practice.

ACF also recognizes the importance of collaboration with Tribes, courts, and other partners in identifying tools that are both practical and responsive to local needs.

5.3 – Attorney Access and Pro Hac Vice Guidance

High-Level Summary: This area addresses Tribal input on attorney participation and guidance for ICWA attorneys seeking to appear in proceedings across jurisdictions. Tribes identified attorney participation as an important component of meaningful Tribal engagement in child welfare proceedings. Input regarding pro hac vice guidance reflects concern that procedural barriers may limit Tribal access to representation or delay participation. Tribes requested clearer guidance to support ICWA attorneys and improve consistency across jurisdictions. This issue connects to broader concerns about timely notice, remote participation, and effective Tribal involvement in court proceedings.

Recommendation 7: Develop and provide guidance for ICWA attorneys regarding **pro hac vice** (the process that allows an attorney licensed in one jurisdiction to appear in a court proceeding in another jurisdiction with the court's permission).

Response: ACF appreciates this recommendation and recognizes that procedural barriers, including those associated with pro hac vice admission, can affect meaningful Tribal participation in child welfare proceedings, particularly when cases involve multiple jurisdictions.

ACF recognizes the importance of ensuring that attorneys representing Tribal interests can participate effectively in proceedings involving Indian children. While attorney admission requirements are established by the applicable court, ACF will consider this recommendation as part of ongoing ICWA technical assistance planning and will continue to explore opportunities to support courts, Tribes, and legal practitioners in addressing barriers to effective participation in ICWA cases.

ACF also recognizes the value of collaboration among Tribes, courts, attorneys, and CIP partners in identifying practical approaches that improve consistency and support meaningful Tribal participation across jurisdictions.

TOPIC 6: Title IV-E Prevention Services Clearinghouse

The Title IV-E Prevention Services Clearinghouse was established to review and rate the evidence of programs and services eligible for Title IV-E prevention funding under the Family First Prevention Services Act (FFPSA). The Clearinghouse assesses programs based on established criteria and provides information to jurisdictions seeking to implement prevention services. ACF oversees the Clearinghouse and provides guidance on its use as part of Title IV-E prevention program implementation. This topic addresses the role of the Clearinghouse within the broader Title IV-E prevention framework.

Tribal input on the Title IV-E Prevention Services Clearinghouse emphasized the importance of evidence standards, research practices, and evaluation approaches that recognize Tribal culture, Tribal data sovereignty, and community-defined prevention strategies. The need to support participation of individuals with lived experience while

ensuring prevention program development is not limited in ways that exclude non-Title IV-E direct Tribes was also identified.

Recommendations

6.1 – Culturally Grounded Evidence Standards

High-Level Summary: This area addresses Tribal recommendations to expand Clearinghouse evidence standards to recognize culturally grounded prevention programs. Tribes emphasized that many culturally grounded prevention programs may not fit conventional evidence review frameworks, even when they are meaningful and effective in Tribal communities. Input encouraged ACF to recognize Tribal ways of knowing, community-defined evidence, and culturally specific prevention approaches. Tribes also supported increasing the number of Tribal programs and services eligible for review. This feedback recognizes a need for evidence-based processes that are rigorous, while also culturally responsive.

Recommendation 1: Expand Clearinghouse evidence standards to recognize culturally grounded Tribal prevention programs.

Response: ACF appreciates this recommendation and recognizes the importance of ensuring that the Title IV-E Prevention Services Clearinghouse reflects programs that are effective in Tribal communities.

The CB has determined it is not practicable for either Tribes directly operating the Title IV-E Prevention program or for Tribes operating under an agreement under section 472(a)(2)(B)(ii) of the Act to meet the same practice criteria as state Title IV-E agencies. Therefore, Tribes may determine the practice criteria for services that are adapted to the culture and context of the Tribal communities, and programs and services are not required to be rated by the Title IV-E Prevention Services Clearinghouse. Program Instructions [ACYF-CB-PI-24-10](#) and [ACYF-CB-PI-24-11](#) outline the requirements under the Title IV-E prevention program.

As of April 2026, the Clearinghouse has reviewed eight eligible programs and services specifically designed for Tribal communities. Of these, Family Spirit® has received a “promising” rating, while others have not yet met the current evidence criteria. The Clearinghouse continues to review programs and services on an ongoing basis. ACF encourages the submission of programs and services for review, including those supported by federal research such as National Institute of Health-funded studies. All submissions are logged and considered and may include publicly available research and evaluation materials.

Recommendations may be sent to PreventionServices@abtglobal.com. Submissions may include publicly available literature in support of recommended programs and services. More information is available about recommending a program or service for review in the Frequently Asked Questions on our website: [How do I recommend a program or service for](#)

[review?](#) and [What information is helpful to include when I recommend a program or service for review?](#)

ACF also recognizes the importance of continuing to explore ways that culturally grounded and Tribally informed evidence can be appropriately reflected within existing review processes.

6.2 – Tribal Research Governance and Data Sovereignty

High-Level Summary: This area addresses recommendations related to Tribal partnership, Tribal Institutional Review Board (IRB) approval, data sovereignty, and culturally appropriate evaluation methods. Tribes emphasized that research and evaluation involving Tribal programs should respect Tribal sovereignty, Tribal research governance, and Tribal control over data. Input specifically referenced Tribal partnership and Tribal IRB approval as safeguards for culturally appropriate research. Tribes also requested flexibility in evaluation expectations so that methods can align with Tribal values and data governance practices. Feedback reflected concern that standard evaluation requirements can impose burden or conflict with Tribal authority, if not adapted appropriately.

Recommendation 2: Require Tribal partnership and Tribal IRB approval in research evaluating Tribal programs.

Response: ACF recognizes the importance of Tribal partnership and Tribal oversight in research and evaluation activities involving Tribal communities.

ACF acknowledges that Tribes have the authority to establish their own research governance processes, including Tribal IRBs and other mechanisms that protect Tribal interests, culture, and data. ACF supports research and evaluation approaches that are conducted in partnership with Tribes and that respect Tribal sovereignty, Tribal data governance, and Tribal decision-making.

ACF will continue to consider these principles in the implementation of prevention-related initiatives and evaluation activities.

Recommendation 3: Provide flexibility for Tribal data sovereignty and culturally appropriate evaluation methods in Clearinghouse grants.

Response: ACF appreciates this recommendation and recognizes the importance of evaluation approaches that reflect culturally appropriate methodologies and Tribal control over data. Program Instructions [ACYF-CB-PI-24-10](#) and [ACYF-CB-PI-24-11](#) outline the Practice Criteria for Prevention Services and Evaluation Strategy requirements under FFPSA. While states are generally required to implement rigorous evaluation and continuous quality improvement (CQI) processes, these requirements do not apply to Tribal Title IV-E agencies or Tribes operating under an agreement with them.

Based on Tribal consultation and experience, these requirements were determined to be impractical for many Tribes. As a result, Tribes are not required to conduct the formal evaluation and CQI requirements applicable to states and are not required to seek a waiver. This flexibility is intended to support Tribes in developing evaluation approaches that align with their values, methodologies, and data governance practices.

6.3 – Lived Experience and Grant Accessibility

High-Level Summary: This area addresses Tribal recommendations to fund lived-experience participation in prevention design and clarify applicability of Clearinghouse standards across Tribal entities. Tribes emphasized that prevention program design and evaluation should be informed by individuals with lived experience, including those familiar with Tribal child welfare systems. Input also raised concerns about whether prevention program development is accessible to Tribes that are not direct Title IV-E agencies. Recommendations requested support for participation in grant development and clarity on how Clearinghouse standards apply across different Tribal funding and program structures. This feedback underscores the importance of prevention design and access to prevention funding opportunities for all.

Recommendation 4: Provide funding to support participation of individuals with lived experience in prevention program design and evaluation including the construction of grants.

Response: ACF recognizes the value that individuals with lived experience bring to the design, implementation, and evaluation of prevention services.

ACF agrees that meaningful engagement of youth, families, caregivers, and community members with lived experience can strengthen prevention programs and improve responsiveness to community needs. ACF will continue to consider opportunities to support meaningful participation in prevention planning, evaluation, and related grant activities, consistent with available authorities and funding.

ACF also recognizes the importance of ensuring that lived-experience perspectives reflect the diversity of Tribal communities and inform prevention efforts in culturally relevant ways.

Recommendation 5: Ensure that prevention program development is not restricted to only Title IV-E direct Tribes so that Tribes will be required to meet the Clearinghouse standards.

Response: ACF recognizes the importance of ensuring that Tribes have meaningful opportunities to participate in prevention program development and implementation, regardless of whether they operate a direct Title IV-E program.

Under the Title IV-E prevention program, Tribes with an agreement under section 472(a)(2)(B)(ii) of the Act may determine the practice criteria for services that are adapted to the culture and context of the Tribal communities served under the agreement. The state

must include these services in the state’s five-year Title IV-E prevention program plan and must describe the practice criteria in the plan. This is detailed in Program Instructions [ACYF-CB-PI-24-10](#), in which the CB recommends that Title IV-E agencies defer to such Tribes regarding the appropriate level of detail provided in the description of the Tribal practice criteria, customary law, and/or governance structure.

ACF acknowledges that many Tribes contribute valuable expertise, experience, and culturally grounded approaches to prevention services. ACF will continue to consider how prevention-related initiatives, technical assistance, and evaluation opportunities can support broad Tribal participation and help ensure that effective Tribal programs and practices are identified, recognized, and shared.

ACF also recognizes the importance of reducing barriers that may limit participation by Tribes that are not direct Title IV-E agencies.

Additional Recommendations

Recommendations

Recommendation 1: Ensure full and uninterrupted implementation of the 2024 AFCARS Final Rule, including ICWA-related data elements.

Response: ACF recognizes the importance of reliable and consistent data in supporting effective implementation of ICWA and appreciates the recommendation.

ACF agrees that AFCARS data, including ICWA-related data elements, can play an important role in understanding implementation trends, identifying strengths and challenges, and informing technical assistance and program improvement efforts. ACF will continue to support states in their implementation of the AFCARS ICWA element requirement to build a high-quality, accurate data source that can be used to understand states’ ICWA implementation strengths and challenges. ACF will consider how this available data can support understanding of implementation progress and promote greater accountability and transparency in ICWA implementation.

Recommendation 2: Protect Tribal data sovereignty, including ownership, access, storage, and use of Tribal child welfare data.

Response: ACF appreciates this recommendation and affirms the importance of respecting Tribal sovereignty and data governance. ACF recognizes that reporting requirements should be designed and implemented in a manner that supports Tribal self-governance and respects Tribal data sovereignty. These principles will inform ongoing efforts to streamline reporting and improve alignment with Tribal priorities and authority.

Additionally, ACF affirms the importance of FFPSA flexibilities, which are intended to support Tribes in developing evaluation approaches that align with Tribal values, methodologies, and data governance practices.

ACF recognizes that Tribal data sovereignty extends beyond reporting requirements and includes Tribal authority over the collection, ownership, access, use, and stewardship of Tribal data.

Recommendation 3: Strengthen federal consultation practices to ensure meaningful government-to-government engagement.

Response: ACF appreciates this recommendation and values meaningful government-to-government dialogue. In response to Tribal feedback, ACF has strengthened internal coordination through the development of a CB TCFT, which brings together staff across CB to support a more consistent, connected, and responsive approach to Tribal engagement. This effort reflects ACF's commitment to strengthening relationships with Tribes, improving coordination across the CB, and supporting more consistent and responsive engagement before, during, and beyond formal consultation opportunities.

Recommendation 4: Kinship caregivers should receive direct financial support with parity to foster care.

Response: ACF recognizes the important role kinship caregivers play in maintaining family, community, and cultural connections for children.

ACF appreciates this recommendation and acknowledges concerns regarding the financial challenges that kinship caregivers may face when caring for children. Public Law 118-258 includes provisions that continue to recognize and support kinship care as a key component of child welfare systems.

ACF also recognizes the significant role of Title IV-E Kinship Navigator programs in helping relatives and kin caregivers identify and access the support they need to care for children safely within their families and communities. These programs connect caregivers with available government and community resources, including food assistance, housing, child care, financial benefits, health care, legal services, and other support that may help prevent children from entering foster care.

ACF will continue to consider Tribal feedback regarding kinship supports and opportunities to strengthen services and resources available to kinship caregivers within existing statutory authorities.

Recommendation 5: Need for ACF support and backing for state and Tribe collaboration, allowing for everyone to come to the table and have accountability when shortfalls occur.

Response: ACF recognizes the importance of strong collaboration between states and Tribes in achieving positive outcomes for Tribal children and families.

ACF agrees that effective implementation of child welfare programs is strengthened when states and Tribes engage as partners and work together to address challenges and identify solutions. Through technical assistance, joint planning, consultation, and ongoing

engagement, ACF will continue to support opportunities for meaningful collaboration and dialogue.

ACF also recognizes the importance of accountability and transparent communication when implementation challenges arise and will continue to collaborate with Tribes and states to support constructive problem-solving and partnership.

Recommendation 6: Prioritize visits for Federal staff to rural cities and smaller communities, not just large metro cities.

Response: ACF values this recommendation and recognizes the importance of engaging Tribes directly in the design and refinement of Title IV-B reporting requirements.

Public Law 118-258 creates new opportunities for collaboration and joint planning with Tribes regarding reporting and administrative burden reduction. ACF anticipates continued Tribal input on reporting structures and implementation through existing engagement mechanisms, including consultation, joint planning activities, and advisory structures.

In addition, ACF continues to strengthen coordination and responsiveness to Tribal priorities across the agency through the renewed work of the ACF Native American Affairs Advisory Council (NAAAC) under the leadership of Kim Kovel, Principal Deputy Commissioner of the Administration for Native Americans. This renewed focus, together with the CB TCFT, supports stronger coordination across program areas and helps ensure that Tribal perspectives continue to inform program implementation and technical assistance efforts.

ACF recognizes the value of coordinated Tribal feedback and will consider approaches, including workgroups and other collaborative forums, to support ongoing Tribal engagement in improving Title IV-B reporting requirements and reducing administrative burden.

Recommendation 7: Require advisory boards or similar governance bodies across federal, state, and Tribal partners to include youth with lived experience as active members sharing accountability across Tribes, federal government, and states.

Response: ACF recognizes the value of including youth and young adults with lived experience in the development, implementation, and evaluation of child welfare programs and policies.

ACF agrees that lived experience perspectives can strengthen decision-making and help ensure that programs are responsive to the needs of children, youth, and families. Public Law 118-258 includes provisions that elevate the role of youth and families with lived experience in program planning and improvement.

ACF will continue to consider opportunities to support meaningful engagement of youth with lived experience in advisory, planning, and governance activities across child welfare

programs. ACF will also continue to leverage agency-wide coordination through the ACF NAAAC and the CB TCFT to strengthen engagement with Tribes and improve responsiveness across ACF programs.

Recommendation 8: The federal government should recognize the unique context of Alaska Native communities by engaging them through tailored, government-to-government approaches that reflect their distinct structures and needs. This includes actively seeking and incorporating Alaska Native voices in policy and implementation efforts to ensure approaches are culturally appropriate and effective.

Response: ACF recognizes the unique circumstances, governance structures, cultures, and service delivery environments of Alaska Native communities.

ACF appreciates the recommendation and acknowledges the importance of engaging Alaska Native Tribes and organizations in ways that reflect their distinct needs, priorities, and experiences. ACF remains committed to meaningful government-to-government engagement and to ensuring that Alaska Native perspectives are considered in policy development, program implementation, and technical assistance efforts.

ACF will continue to seek opportunities to engage directly with Alaska Native communities and incorporate their feedback into ongoing work. ACF will also continue to leverage agency-wide coordination through the ACF NAAAC and the CB TCFT to strengthen engagement with Tribes and improve responsiveness across ACF programs.

Recommendation 9: Prioritize convenings in regional hubs such as Fairbanks, Anchorage, and Juneau to improve access to accommodations and reduce barriers for participants traveling from other communities.

Response: ACF recognizes the unique circumstances, governance structures, cultures, and service delivery environments of Alaska Native communities.

ACF appreciates the recommendation and acknowledges the importance of engaging Alaska Native Tribes and organizations in ways that reflect their distinct needs, priorities, and experiences. ACF remains committed to meaningful government-to-government engagement and to ensuring that Alaska Native perspectives are considered in policy development, program implementation, and technical assistance efforts.

ACF will continue to seek opportunities to engage directly with Alaska Native communities and incorporate their feedback into ongoing work. ACF will also continue to leverage agency-wide coordination through the ACF NAAAC and the CB TCFT to strengthen engagement with Tribes and improve responsiveness across ACF programs.

Appendix

1. List of Submitted Tribal Letters

- Aleut Community of St. Paul Island Tribal Government
- Bristol Bay Native Association, Inc.
- California Tribal Families Coalition
- Chickasaw Nation
- Citizen Potawatomi Nation
- Kawerak, Inc.
- Lac Courte Oreilles Band of Lake Superior Chippewa Indians of Wisconsin
- Lummi Nation
- Morongo Band of Mission Indians
- National Indian Child Welfare Association
- Navajo Nation
- Oglala Sioux Tribe
- Organized Village of Kasaan
- Pascua Yaqui Tribe
- Pokagon Band of Potawatomi Indians
- Port Gamble S’Klallam Tribe
- Southern Plain Region Tribes
- Standing Rock Sioux Tribe
- Stillaguamish Tribe
- Winnebago Tribe of Nebraska

2. List of Attendees

Note Regarding Participant Lists

ACF has made every effort to accurately identify the individuals, Tribal affiliations, organizational affiliations, and titles included in the participant lists contained in this report. These lists were compiled using available registration information, meeting records, and recordings from the consultation sessions.

Despite these efforts, there may be instances where names, titles, Tribal affiliations, or organizational affiliations are incomplete, misspelled, or otherwise inaccurate due to limitations in the available records or the quality of meeting recordings. If any information has been recorded incorrectly or omitted, ACF sincerely regrets these inadvertent errors. We remain committed to recognizing the valuable contributions of all participants and welcome corrections so that our records may be updated, as appropriate.

ACF Washington, D.C. Tribal Consultation	
In Person Attendees	
ACF/CB Leadership	
Name	Title and/or Tribal Affiliation
Ryan Hanlon	Associate Commissioner, CB
Jennifer Haight	Deputy Associate Commissioner, CB
Kim Kovol	Principal Deputy Director, Administration for Native Americans, ACF
Nanette Bishop	Child Welfare Program Specialist, CB
Additional ACF/CB Participants	
Christine Lamble	Program Specialist
Dianne Kelly	Regional Program Manager
Rebecca Odor	Social Science Research Analyst
LaResa Price	Child and Family Program Specialist
Linda Viales	Program Specialist
Morgan Nelson	CB Child and Family Program Specialist
Latoya Wright	Regional Program Specialist
Carlette Randall	Child Welfare Program Specialist
Curtis Phillips	AV Engineer
Cheyenne Owens	Executive Assistant
Anthony Bingham	Program Specialist
Debora Flowers	Child and Family Program Specialist
Jana Bertucci	Child Welfare Program Specialist
Jennifer Grayon	Child Welfare Program Specialist
Catherine Heath	Child Welfare Program Specialist
Jennifer Lee	Child Welfare Program Specialist
Lauren Fischman	Child Welfare Program Specialist

ACF Washington, D.C. Tribal Consultation	
Name	Title and/or Tribal Affiliation
Elaine Stedt	Supervisor of Child Welfare Program Specialist
Emily Fisher	Child Welfare Program Specialist
Triliza Trent	Child Welfare Program Specialist
Kara Allen-Eckard	Child Welfare Program Specialist
Tina Naugler	Director of Regional Programs
Randi Walters	Director of Capacity Building and Policy Divisions
Nadine Dalley-Smith	Child and Family Program Specialist
Kimberly Murphy	CB Technical Advisor
Ebony Jeffries	Child and Family Program Specialist
Charla Miller	Child and Family Program Specialist
Antonette Rollins	Supervisor
Shannel Squally-Janzen	Tribal Prevention Service Specialist
Tinaddine Paul-Bazil	Program Specialist
Vicki White	Parent and Family Engagement Consultant
Sheina Yellowhair-Flores	Tribal Programs Supervisor
Valerie Vasquez	Midwest Regional Social Worker
Sallie Tilley	Supervisory Social Work
Melissa Swanson	Tribal Specialist
Melita Rank	Social Worker
Amanda Murphy	Policy Project Administrator
In Person Tribal Attendees	
Name	Title and/or Tribal Affiliation
Verlet Montano	Early Childhood Education Director, Campo Kumeyaay
Amy Simmons	Child Protective Services Supervisor (Family First), Cherokee Nation
Elizabeth Rule	Chickasaw National Special Envoy to Washington, DC, Chickasaw Nation
Cherity Wallace	Family Preservation Director, Choctaw Nation of Oklahoma
Muskadee Montano	Coordinator, Community/enrolled member of Red Cliff Band of Lake Superior Chippewa Tribe
Rusty Creed Brown	Deputy Director, Delaware Tribe of Indians
Peter Lengkeek	Chairman, Great Crow Creek Sioux Tribe
Jacqueline Moen-Kadlec	Supervisor, Ho-Chunk Nation
Loni Greninger	Vice Chairwoman, Jamestown S'Klallam Tribe
Douglass Glass	Case Management Supervisor, Ketchikan Indian Community
Jolene Nagy	Program Manager, Lummi Nation
Destiny Petroske	Policy Analyst, Lummi Nation
Crysandra Sones	Social Services Manager, Makah Indian Tribe
Augusta Williams	ICWA Case Manager, Mescalero Apache Tribe

ACF Washington, D.C. Tribal Consultation		
Name	Title and/or Tribal Affiliation	
Erica Booth	Metlakatla Social Services Director, Metlakatla Indian Community	
Trina Grayson	Asst. Indian Child Welfare Coordinator, Miami Tribe of Oklahoma	
Sally Allen	Deputy Director, Mississippi Band of Choctaw Indians	
Sally Wilson	Deputy Director, Mississippi Band of Choctaw Indians	
Sheridan DesGranges	Tribal Liaison, N/A	
Holly Lumanauw	Regional Director, N/A	
Hollye Pickett	Regional Director, N/A	
Selah Ketcham	ICWA/Victim's Services Coordinator, Native Village of Chitina	
Lola Tobuk	Director of Family Services, Nome Eskimo Community	
Brittany Madros	Designated Tribal Representative, Nulato Village	
Laurel Iron Cloud	Chief Judge, Oglala Sioux Tribe	
Emily Koenen	CPS & ICWA Task Force, Oglala Sioux Tribe	
Alicia Mousseau	Elected Official, Oglala Sioux Tribe	
Brandy Aldridge	Adult Protective Services, Osage	
Karina Romero	Accountant, Pascua Yaqui Tribe	
Erina Burggraf	Tribal Council MAL, Pokagon Band of Potawatomi	
Stephanie Pospisil	Human Services Director, Ponca Tribe of Nebraska	
Tracey Cordero	HHS Director, Pueblo de San Ildefonso	
Henrietta Gauchupin	Manager, Pueblo of Jemez	
Dawn McAvaney	Housekeeping, Red Cliff Band of Lake Superior Chippewa	
William Snell	Executive Director, Rocky Mountain Tribal Leaders Council	
Dr. Luti Stone-Davis	Legislative Advisor, Rosebud Sioux Tribe	
Kathleen Wooden Knife	Elected Official, Rosebud Sioux Tribe	
Mylene Wanatee	Director, Sac & Fox Tribe of the Mississippi in Iowa	
Clarissa Chatland	Deputy Commissioner, Saint Regis Mohawk Tribe	
Johanne Sullivan	Senior Staff Attorney, Saint Regis Mohawk Tribe	
Jade White	Commissioner/Director, Saint Regis Mohawk Tribe	
Sky Snyder	ICWA Program Manager, Saint Regis Mohawk Tribe	
Emily Shield	Child Protection Specialist, Seneca-Cayuga Nation	
Kimberly Phillips	Indian Child Welfare Director, Seneca-Cayuga Nation	
Wendy Nichols	SACRED Program Director, Seneca-Cayuga Nation	
Malissa Poog	Child Welfare Program Manager, Shpshone-Bannock	
Donalda Charboneau	Tribal Welfare Director, Spirit Lake Sioux Tribe	
Nateisha Delorme	Management Assistant, Spirit Lake Tribal Social Services	
Bethany Yankton	Assistant Program Manager, Spirit Lake Tribe	
Lonna J Street	Tribal Chairwoman, Spirit Lake Tribe	
Kimberly Long	Tribal Child Welfare Director, Standing Rock Sioux Tribe	
Wakan-Yu-Bdece-Win McKay	Tribal Child Welfare Office Manager, Standing Rock Sioux Tribe	

ACF Washington, D.C. Tribal Consultation	
Feleesha Bruette	Stockbridge Munsee Constitution Committee Member, Stockbridge Munsee Community and Menominee
Cassandra Hernandez	Lead Social Service Worker/Social Worker MSW, Tejon Indian Tribe
Anthony Esquibel	Tribal Child Welfare Liaison, Three Affiliated Tribes
Mary Johnson	Senior Director, Tlingit & Haida
Heather Lopez	Program Manager, Tolowa Dee-ni' Nation
Jessica Ullrich	Assistant Professor, Tribal Citizen of Nome Eskimo Community, work with several Tribes and organizations in Alaska
Harmony Bercier	ND ICWA Partnership Project Manager, Turtle Mountain Band of Chippewa Indians
Tasha Mousseau	Vice President, Wichita and Affiliated Tribes
Other Attendees	
Charlene Naulty	Consultant, Alaska Federation of Natives
Francine Jones	Contractor, Alaska Federation of Natives
Rodreshia Dunbar	Director, Alaska Federation of Natives
Amanda McAdoo	Family Programs Administrator, Aleutian Pribilof Islands Association, Inc.
Emma Sullivan	Division Manager, Bristol Bay Native Association – Family Services Department -Children’s Services Division
Alice Langton-Sloan	Health and Human Services Director, Cahto Tribe of the Laytonville Rancheria
Michelle Castagne	Tribal Attorney, California Tribal Families Coalition
Anita Horner	Director, Indian Child and Family Well-Being Program, Casey Family Programs
Angelina Callis	Director, Indian Child and Family Well-Being, Casey Family Programs
Emily Hecht-McGowan	Child Welfare Organization, Casey Family Programs
Nancy Spears	Indigenous Children and Families Reporter, Cherokee Nation / The Imprint
Kolby Fenster	Head of Customer Relations, Handel Information Technologies
Verna Johnson	Project Manager, ITCA
Carly Dunn	Sr. Research Associate, JBA
Elaine Williams	Social Worker, Jemez Pueblo, NM
Traci McGarry	Children and Family Services Director, Kawerak, Inc
Miriam Friesen	State-Tribal Partnership Grant Coordinator, Minnesota Children’s Justice Initiative (Minnesota’s Court Improvement Program)
Amanda Docter	Tribal Program Manager, N/A
Sloan Henry	ND Partnership Grant – Tribal Capacity Builder, NATI
Evan Roberts	Government Affairs and Community Development Specialist, National Indian Child Welfare Association
Mariah Meyerholz	Government Affairs and Community Development Specialist, NICWA

ACF Washington, D.C. Tribal Consultation	
Te'Ata Loper	Executive Director, Oklahoma Indian Child Welfare Association
Hope Craig	Chairwoman and President, United American Indian Organization
Leander McDonald	President, United Tribes Technical College

ACF Chandler, Arizona Tribal Consultation	
In Person Attendees	
Name	Title and/or Tribal Affiliation
Cesar Gonzalez-Garcia	Policy Analyst, California Rural Indian Health Board (CRIHB)
Domingo DeGrazia	ICWA Supervising Attorney, Pascua Yaqui Tribe
Gloria Alvarez Gomez	Tribal Council Member, Pascua Yaqui Tribe
Janet Alkire	Chairman, Standing Rock Sioux Tribe
Laurel Iron Cloud	Tribal Engagement Director, CB, ACYF
Mikah Carlos	Council Member, Salt River Pima-Maricopa Indian Community in Arizona
Dr. Mark LeBeau	Chief Executive Officer, CRIHB
Rosa Soto Alvarez	Secretary, Pascua Yaqui Tribe
Michael Jordan	Native Village of Goodnews Bay of Southwest Alaska

ACF Onamia, Minnesota Tribal Consultation	
In Person Attendees	
Name	Title and/or Tribal Affiliation
Bruce Savage	Chairman, Fond du Lac Band of Lake Superior Chippewa
Carlos Hernandez	Chairman, Bois Forte Band of Chippewa
Cheri Goodwin	Director, Ombimindwaa Gidinawemaaganinaadog Program, Red Lake Nation
Dan Poupart	Council Member, Lac du Flambeau Band of Lake Superior Chippewa Indians
Faron Jackson	Chairman, Leech Lake Band of Ojibwe
George Mitchell	Senior Advisor, ACYF
Gloria Cobb	Council Member, Lac du Flambeau Band of Lake Superior Chippewa Indians
James Schlender	Attorney, Lac du Flambeau Band of Lake Superior Chippewa Indians
Jenny Webster	Council Member, Oneida Nation
Joseph Bock	Acting Commissioner, CB, ACYF
Laurel Iron Cloud	Tribal Engagement Director, CB, ACYF
Laurie York	Executive Director, White Earth Nation
Lorraine Gouge	Board Member, Lac Courte Oreilles Band of Lake Superior Ojibwe
Michelle Beaudin	Secretary/Treasurer, Lac Courte Oreilles Band of Lake Superior Ojibwe

ACF Onamia, Minnesota Tribal Consultation		
Mike LaRoque	Secretary-Treasurer, White Earth Nation	
Nicole Wadena	Secondary Program Manager, Leech Lake Band of Ojibwe	
Robert Deschampe	Tribal Chair, Grand Portage Band of Lake Superior Chippewa	
Robert Larsen	President, Lower Sioux Indian Community, Minnesota Indian Affairs Council	
Sam Strong	Tribal Secretary, Red Lake Nation	
Virgil Wind	Chief Executive, Mille Lacs Band of Ojibwe	
Online/Remote Participants		
Name	Title and/or Tribal Affiliation	
Abigail Otis	Family Homeless Prevention and Assistance Program, Fond du Lac Band of Lake Superior Chippewa	
Andrea Sanders	Legal Assistant, ICWLC Law Center, Little Traverse Bay Band of Odawa Indians	
Anna Deschampe	Tribal Programs Administrator, Grand Portage Band of Lake Superior Chippewa	
Ashton Martin	Health Policy Analyst, United South and Eastern Tribes, Inc	
Bill Cataldo	Attorney, The Little River Band of Ottawa Indians	
Brandon Wisneski	Self-Governance Coordinator, Oneida Nation	
Brian Howard	Senior Policy Analyst, United South and Eastern Tribes, Inc	
Carley Nadeau	Technology Lead, University of Minnesota Duluth (UM Duluth)	
Christine Lamble	Public Policy and Regulatory Analyst, ACYF	
Christine Lucero	Program Specialist, ACYF	
David Berndt	Federal Relations Officer, Wisconsin Department of Children and Families	
Denise Galatas	Grants Manager, Chitimacha Tribe of Louisiana	
Diane Shimizu	Child and Family Program Specialist, CB, ACYF	
Gillian PlentyChief	Director, Native American Training Institute	
Heather Lee	Indian Child Welfare Supervisor, Oneida Nation	
Janelle Barney	Social Services, Department Coordinator, Fond du Lac Band of Lake Superior Chippewa	
Joshua Bess	Secretary, Chickasaw Nation	
Judi Helmin	Child Protection Supervisor, Mille Lacs Band of Ojibwe	
Julia Overmyer	ICWA Designated Agent/Social Work Technician, Keweenaw Bay Indian Community	
Juliane Chase-Wilson	Community Engagement & Development, ICWA Law Center	
Juliet Means	Indian Child Welfare Director, Red Cliff Band of Lake Superior Chippewa	
Karen Hamilton	Indian Child Welfare Director, Sac and Fox Nation	
Kayla Madigan	Family Homeless Prevention and Assistance Program, Leech Lake Band of Ojibwe	
Kendall Darling	Regional Program Manager, ACYF	

ACF Onamia, Minnesota Tribal Consultation	
Louise Padron	Family Services Supervisor, Oneida Nation
Malissa Poog	Program Manager, Shoshone-Bannock Tribes
Mariah Wabasha	Director, Lower Sioux Indian Community
Marilyn Kennerson	Denver Regional Program Manager, ACYF
Mark Erickson	Outreach and Development Manager, Tribal Training and Certification Partnership (TTCP), UM Duluth
Maskadee Montano	Social Worker, UM Duluth
Melissa Nuthals	Data Analyst, Oneida Nation
Neil Lawhead	Tribal Engagement, ACYF
Priscilla Day	TTCP, Minnesota DHS
Rainer Master	ICWA Enrollment Coordinator, Cheesh'na Tribal Council
Raquel Thompson	Program Specialist, ACYF
Samantha Skenandore	Attorney, Skenandore Wilson LLP
Seth Persky	Child and Family Program Specialist, CB, ACYF
Stephanie McAllister	Child and Family Program Specialist, CB, ACYF
Sunshine Day	Graduate Student, UM Duluth
Susan Schrader	Director, Oglala Sioux Tribes Child Protection Services and Indian Child Welfare Program
Tera Jasken	Community Trainer, TTCP UM Duluth
Terry Withrow	Policy Analyst, Office of Self Governance, Potawatomi Nation
Thomasina Real Bird	Partner, Patterson Real Bird & Rasmussen, Yankton Sioux Tribe
Tim Benally	Navajo Nation Government and Legislative Affairs Officer
Tina Lightfoot	Missing and Murdered Indigenous Persons Policy Analyst and Advocate, Michigan Department of Health and Human Services
Tricia Swartz	Senior Advisor, ACYF

ACF Seattle, Washington Tribal Consultation	
In Person Attendees	
Name	Title and/or Tribal Affiliation
Alan Faulkner	Program Manager, Native Village of Dot Lake, Alaska
Amanda Doctor	Program Manager, Children and Family Services in Nebraska
Amanda McAdoo	Family Services Coordinator, Aleutian Tribe Pribilof Islands Association, Inc.
Amelia Hayward	Aleutian Tribe Pribilof Islands Association, Inc.
Angela Connor	Child and Family Program Specialist, National Indian Child Welfare Association (NICWA)
Angelina Callis	Casey Family Programs
Ashawna Miles	Director of Self Governance, Cherokee Nation
Autumn Adams	Indigenous Rights Fellow, Amnesty International

ACF Seattle, Washington Tribal Consultation	
Blair Cruiser	Co-Executive Director of California Tribal Families Coalition, Hoopa Valley Tribe
Casey Aranda	Case Manager Supervisor, Yakama Nation Program
Chelsea Welch	TFIS Manager, Clinton Haida Indian Tribes of Alaska (Lynnwood Washington office)
Cheryl Miller	Director of Children and Family Services for the Port Gambles Callum Tribe, Assiniboine Sioux Tribe from the State of Montana
Darlene Wagner	Director of Social Services, Arctic Slope Native Association
David Huh	Director of Methods Division, The Indigenous Wellness Research Institute
David Simmons	Director of Government Affairs and Advocacy, NICWA
Diane Shimizu	Child and Family Program Specialist, CB, ACYF
Dr. Angelique Day	Professor, University of Washington (UW) Seattle, School of Social Work
Elaine Williams	Office of Respondent Parent Council in Colorado
Emma Sullivan	Children's Services Division Manager, Bristol Bay Native Association
Evan Roberts	Government Affairs and Community Development Specialist, NICWA
Felipe Farley	General Counsel, Bristol Bay Native Association
Fiona God Sally Wilson	Indian Child Welfare Senior Director, Cherokee Nation
Francis Piffer	Social Services Director, Shasta Indian Nation
Gianna Demmon	APA
Jeremy Gravier	Tribal Temporary Assistance for Needy Families (TANF) Program, Round Valley Tribes
Hannah Jones	Grant Writer, Port Gamble School and Tribe in WA
Dr. Holly Scheib	Director, Community Development and Health and Human Services at Taos Pueblo
Jacqueline Yalch	Pueblo Isleta Social Services Director, Child Welfare Program
James Craig	Third Tribal Councilman for Tunica Biloxi Tribe of Louisiana
Joni Williams	ICW Program Manager, Cowlitz Indian Tribe
Joy Lena Gonzalez	Child Welfare Department, Port Gamble S'Klallam Tribe
Kitty Washburn	Tribal Liaison, Nebraska Indian Child Welfare Coalition
Lance Banez	Research Scientist, UW
Laurel Iron Cloud	Tribal Engagement Director, CB, ACYF
Lynna Pitch	Client Program Supervisors, North Fork Rancheria Tribal TANF
Liz Holland	Foster Care Supervisor, United Indians of All Tribes Foundation
Malissa Poog	Program Manager, Shoshone-Bannock Tribes
Maria Guerra	Family and Social Services Director, Kenaitze Indian Tribe
Mariah Meyerholz	Government Affairs and Community Development Specialist, NICWA

ACF Seattle, Washington Tribal Consultation	
Marianne McGovern	Tribal Council Treasurer for North Folk Rancheria of Mono Indians of CA, Chairperson for the CA Tribal Families Coalition
Mark Vezzola	General Counsel, Pechanga Band of Indians
Dr. Mary DuPuis	Chehalis Tribe, Washington State
Mikah Carlos	Council Member, Salt River Pima-Maricopa Indian Community in Arizona
Dr. Mike Spencer	Dean of School of Social Work, UW
Nicole Gonzalez	TANF Director, North for Grand Sharia Tribal TANF
Nicole Homer	Tribal Attorney, Lac Courte Oreilles Band of Lake Superior Chippewa Indians in Wisconsin
Nicole Yohalem	Knowledge Management Director, Casey Family Programs
Niisha Watsh	Tribal Social Services Manager, Tanana Chiefs Conference
Rainer Master	ICWA Enrollment Coordinator Cheesh'na Tribal Council
Rebecca Grable	Director for the Indian Child and Family Wellbeing Unit, Casey Family Programs
Rosario Ortiz	Casey Family Programs Strategic Consultant, Washington State
Sean Duran	Chief of Operations, Taos Pueblo in Northern New Mexico
Shannel Squally-Janzen	Office of Tribal Relations, Washington State DCYF, Puyallup Tribal Member
Sherri Burdine	Director of Tribal Relations, UW
Shawnti Johnson	Child Welfare Training Advancement Program UW and State Department of Children Youth & Families (DCYF)
President Amber Silverhorn-Wolfe	President, Wichita and Affiliated Tribes
Stephanie Gomez	ICWA Case Manager, Yakama Nation
Susan Schrader	Director, Oglala Sioux Tribes Child Protection Services and Indian Child Welfare Program
Tleena Spotted Elk	Managing Director, Tribal Relations at Washington State DCYF
Terri Colleta	Aleut Community of St Paul Island Tribal Government, Director of the Department of Community Safety and Peace
Traci McGarry	Vice President, Children and Family Services, Kawerak, Inc.
Vice Sherman	Casey Family Programs

Dear Tribal Leaders and Tribal Representatives,

On behalf of the Administration for Children and Families (ACF) and the Children's Bureau (CB), thank you for participating in the Tribal Consultation process that informed the enclosed Supporting America's Children and Families Act Tribal Consultation Report. We are grateful for the recommendations, perspectives, and expertise shared through written comments, in-person consultation sessions, virtual consultation opportunities, and related engagements. Your contributions provided valuable guidance on strengthening tribal child welfare systems, reducing administrative burdens, improving implementation of the Indian Child Welfare Act, supporting tribal courts, and ensuring that federal programs are responsive to tribal priorities and sovereignty. Your input is essential to ensuring that ACF programs and policies reflect tribal priorities and support strong, healthy outcomes for tribal children, youth, and families.

The enclosed report was prepared in accordance with the ACF Tribal Consultation Policy and summarizes the recommendations and feedback shared by tribes throughout the consultation process, along with ACF's responses and ongoing considerations. It reflects input received through written submissions from 20 tribes, oral testimony and discussion during in-person consultations, and comments shared during virtual consultation opportunities. This document represents an important step in documenting tribal feedback and promoting transparency in how recommendations are considered and addressed. We recognize that consultation is not a one-time event, but part of an ongoing government-to-government relationship. As part of this commitment, ACF has established a new Tribal Cross-Functional Team to strengthen coordination across programs, improve responsiveness to tribal priorities, and support a more consistent approach to tribal engagement.

We deeply appreciate the time, effort, and expertise of tribal leaders, tribal representatives, tribal child welfare professionals, tribal courts, advocates, and community members who contributed throughout this process. ACF and CB look forward to continuing our partnership with tribes to strengthen support and services for tribal children, youth, families, and communities.

Sincerely,



Ryan Haxton

Associate Commissioner Children's Bureau
Administration for Children and Families
U.S. Department of Health and Human Services

2. Background Materials

- Information Memo dated June 18, 2025
- Summary of Provisions
- Framing Questions
- Side-by-Side Comparison
- Agenda
- Presentation
- Federal Register Notice (FRN).



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, D.C. 20201 | www.acf.hhs.gov

July 25, 2025

Dear Tribal Leader:

The Administration on Children, Youth and Families (ACYF) and the Children's Bureau (CB) within the Administration for Children and Families (ACF) recognize the central role that Tribal Nations play in the care and protection of children and families. To advance our collaborative efforts to that end, we extend an invitation to participate in formal tribal consultation on the ["Supporting America's Children and Families Act,"](#) (Public Law 118-258), which reauthorized Title IV-B of the Social Security Act (Act).

Consultation will focus on the changes to title IV-B of the Act, listed in detail in attached documents, and how they may impact Tribes. In summary, the focus areas are the Indian Child Welfare Act, title IV-B funding for child welfare agencies, the Court Improvement Program and remote hearings, and the Prevention Services Clearinghouse.

We are soliciting your input as we value your perspectives and experiences, which are crucial as we work together to implement the Act. The consultation is intended to create meaningful opportunity for dialogue that enhances the effectiveness of child welfare services for Tribal Nations and the people they serve.

We look forward to hearing from you at one or more of the following sessions:

CONSULTATION #1 - MINNESOTA

Date: August 25, 2025

Type: In-person and Virtual (Hybrid) Tribal Consultation

Time: 1 – 4 PM Central Time

In-Person Location: Grand Casino Mille Lacs

777 Grand Avenue

Onamia, MN 56359

RSVP for In-Person Participation: [**Tribal Consultation In-Person RSVP**](#)

Zoom Registration for Virtual Participation: [Zoom Link Registration](#)

CONSULTATION #2 – SOUTH DAKOTA

Date: October 10, 2025

Type: In-person

Time: 1- 3 PM Mountain Time

In-Person Location: DoubleTree by Hilton Rapid City Downtown Convention Center
505 N. 5th Street
Rapid City, SD 57701

RSVP for In-Person Participation: [Tribal Consultation In-Person RSVP](#)

CONSULTATION #3 – ALASKA

Date: October 14, 2025

Type: In-person

Time: 1:30 - 5 PM Alaska Daylight Time

In-Person Location: Hilton Anchorage

500 West Third Avenue
Anchorage, Alaska 99501

RSVP for In-Person Participation: [Tribal Consultation In-Person RSVP](#)

CONSULTATION #4 - WASHINGTON

Date: November 18, 2025

Type: In-person and Virtual (Hybrid)

Time: 10 AM – 3 PM Pacific Time

In-Person Location: University of Washington School of Social Work -3rd floor Conference Room
4101 15th Ave NE
Seattle, WA 98105

RSVP for In-Person Participation: [Tribal Consultation In-Person RSVP](#)

Zoom Registration for Virtual Participation: [Zoom Link Registration](#)

CONSULTATION #5 – WASHINGTON DC

Date: December 2, 2025

Type: In-person

Time: 2 PM – 5 PM Eastern Time

In-Person Location: Mary E Switzer Building
330 C Street
Washington DC 20201

RSVP for In-Person Participation by November 25, 2025: [Tribal Consultation In-Person RSVP](#)

**This is a Federal Building - Please be prepared to present valid ID to meet security requirements for building entrance.

Written comments may also be submitted to TribalConsultationACYF@acf.hhs.gov by January 9, 2026. Please include the following in the subject line: Title IV-B Implementation Tribal Consultation. A consultation report will be made available within ninety (90) of the final consultation session.

In addition to these formal consultations, and in response to requirements in the Act, ACF is also issuing a [Federal Register Notice](#) to solicit additional input from the public.

To facilitate preparation for the consultation, please find attached a Children’s Bureau Information Memo of June 18, 2025, Summary of Provisions, Framing Questions, and a Side-by-Side legislative language comparison.

If you have questions about the consultations, please contact Laurel Iron Cloud at ACYF, Laurel.IronCloud@acf.hhs.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Joseph F. Bock". The signature is written in a cursive, slightly slanted style.

Joseph Bock
Acting Commissioner
Administration on Children, Youth and Families

Enclosures: Information Memo, Summary of Provisions, Framing Questions, Side-by-Side Comparison

ATTACHMENT A

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration on Children, Youth and Families	
	1. Log No: ACF-ACYF-CB-IM-25-04	2. Issuance Date: June 18, 2025
	3. Originating Office: Children's Bureau	
	4. Key Words: Title IV-B; Reauthorization; Supporting America's Children and Families Act	

INFORMATION MEMORANDUM

TO: State, Tribal, and Territorial Agencies Administering or Supervising the Administration of Title IV-B of the Social Security Act.

SUBJECT: NEW Law – Public Law (Pub. L.) 118-258, The Supporting America's Children and Families Act

RELATED REFERENCES: Title IV-B of the Social Security Act (the Act) as amended by Public Law 118-258, enacted January 4, 2025.

PURPOSE: To inform states and Tribes of enactment of the *Supporting America's Children and Families Act* and provide information on the new law.

BACKGROUND: The Supporting America's Children and Families Act, [Pub. L. 118-258](#), was signed into law on January 4, 2025. This law reauthorizes and amends title IV-B programs. The major changes are described below (please refer to attachment A for the complete amendments).

EFFECTIVE DATES: The amendments made by the Supporting America's Children and Families Act take effect on October 1, 2025, and apply to title IV-B payments for calendar quarters beginning on or after such date.

For States: A delay is permitted if the Department of Health and Human Services (HHS) determines that legislation (other than legislation appropriating funds) is required for a state to meet the additional title IV-B plan requirements imposed by this legislation. The delay is defined as the first day of the first calendar quarter beginning after the first regular session of the state legislature that begins after the date of the enactment (sec. 117 of Pub. L. 118-258).

For Indian tribes, tribal organizations, or tribal consortiums: If a Tribe requires time to take action to comply with the additional requirements imposed by this legislation, HHS will provide the Tribe with such additional time as determined necessary.

INFORMATION:

Reauthorization:

- Reauthorizes appropriations for title IV-B, subpart 1 through FY 2029 at the current authorization level of \$325,000,000 per fiscal year (FY) (sec. 425 of the Act).
- Reauthorizes mandatory and discretionary appropriations for title IV-B, subpart 2 through FY 2029. ○ *Mandatory Appropriation:* Maintains the current mandatory appropriation of \$345,000,000 for FY 2025 and increases the mandatory appropriation for FYs 2026-2029 to \$420,000,00 (sec. 436(a) of the Act). ○ *Discretionary Appropriation:* Reauthorizes the discretionary appropriation at the current level of \$200,000,000 for FYs 2025-2029 (sec. 437(a) of the Act).

Summary of Provisions Relating to State and Tribal Title IV-B Formula Grants:

Title IV-B, subpart 1 Stephanie Tubbs Jones Child Welfare Services Program:

- *Amendments to Title IV-B, Subpart 1 Plan Requirements:*
 - *Plan Administration:* Provides that a “state agency” will administer/supervise the administration of the title IV-B, subpart 1 plan, removing the requirement that the agency that administers the Social Services Block Grant (SSBG) under title XX of the Act must also administer the title IV-B, subpart 1 plan (sec. 422(b)(1) of the Act).
 - *Legal Representation:* Requires agencies to describe the steps they will take to ensure that information about available independent legal representation in specified child welfare proceedings are provided to the child, as appropriate, and the child’s parent, legal guardian or individual who has legal custody (sec. 422(b)(4)(C) of the Act). ○ *The Indian Child Welfare Act of 1978 (ICWA):* Expands the current state plan requirement directing agencies to consult with Tribes and describe specific measures taken to comply with ICWA to now also describe how the state will ensure timely notice to Tribes of state custody proceedings and placements involving Indian children and case recordkeeping related to transfers of jurisdiction, termination of parental rights, and active efforts (sec. 422(b)(9) of the Act).
 - *Health Care Oversight and Coordination Plan:* Requires agencies to modify their title IV-B Health Care Oversight and Coordination plan to include consultation with mental health agencies and providers in the development of the plan, describe the steps taken to ensure continuity of mental as well as physical health services, and expand the description of oversight of prescription medications to include informed consent of youth, and compliance with professional practice guidelines (sec. 422(b)(15)(A) of the Act). ○ *Monthly Caseworker Visits:* Requires agencies to describe how they may offer virtual monthly caseworker visits to youth in foster care aged 18 and older who have consented to receiving virtual visits (sec. 422(b)(17) of the Act).

- *Elimination of Financial Penalties Relating to Caseworker Visit Performance Standards:* Eliminates the reduction in Federal Financial Participation for states not meeting targets for monthly caseworker visits with children in foster care (sec. 424(f) of the Act).
- *Tribal Funding and Flexibilities:*
 - Revises direct payments to Tribes to require that HHS reserve 3 percent from the title IVB, subpart 1 appropriation prior to allotting funds to states (sec. 423(a)(1) and 428(a) of the Act). Previously, title IV-B, subpart 1 had no specific set aside for tribal awards; instead, allotments have been deducted from amounts otherwise allotted to the state(s) in which the Tribe is located. Tribal allotments from the new set aside will be based on the Tribe’s population of children under age 21 (sec. 433(a) of the Act).

- Allows HHS to modify any title IV-B reporting requirement for Tribes whose allotment under title IV-B, subpart 1 is less than \$50,000 (sec. 428(b) of the Act).
- Allows Tribes to substitute a weighted average of federally negotiated indirect cost rates for administrative cost caps required in sec. 422(b)(14) and 424(e) of the Act (sec. 428(c) of the Act).

Title IV-B, subpart 2 MaryLee Allen Promoting Safe and Stable Families Program (PSSF):

- ***Definitions:***

- Expands and modifies definitions of “family preservation services,” “family support services,” and “family reunification services” and clarifies that kinship care families are eligible for services (sec. 431(a)(1)-(2) and (7) of the Act). Includes mentoring as a “family preservation service” (sec. 431(a)(1)(G) and (12) of the Act).
- Adds a definition for “family resource center” to mean a community or school-based hub of support services for families that builds communities of peer support for families, among other things (sec. 431(a)(10) of the Act).
- Adds a definition of “youth” to mean an individual who has not attained 26 years of age (sec. 431(a)(11) of the Act).

- ***Amendments to Title IV-B, Subpart 2 PSSF Plan Requirements:***

- ***Policies Relating to Poverty and Neglect:*** Requires agencies to provide a description of policies, including training for employees, to address child welfare reports and investigations of neglect concerning living arrangements and subsistence needs to prevent the separation of a child from a parent solely due to poverty, to ensure access to support services for immediate needs (sec. 432(a)(11) of the Act).
- ***Involving Youth and Families with Lived Experience:*** Requires agencies to consult with youth and families with lived experience in child welfare systems, in addition to the nonprofit and community-based organizations currently required, and to make a report publicly available on how the agency has implemented the youth’s suggestions (sec. 432(b)(1) of the Act).
- ***Tribal PSSF Funding and Set-aside:*** No changes are made to the tribal funding formula for FY 2025. Beginning in FY 2026:
 - The 3 percent set-aside for Tribes is applied to the full mandatory appropriation before applying set-asides for the Regional Partnership Grants and Monthly Caseworker Visit grants (sec. 436(b)(2) of the Act).
 - The 3 percent set-aside of the discretionary appropriation for Tribes remains unchanged (sec. 437(b)(3) of the Act).
 - A Tribe may receive PSSF funds if it qualifies for an allotment of at least \$10,000 based on mandatory and discretionary funds combined (sec. 432(b)(2)(B) of the Act).
- ***Monthly Caseworker Visit Grants:***
 - ***Purpose:*** Beginning in FY 2026, funds must be used to improve the quality of monthly caseworker visits with an emphasis on reducing caseload ratios and administrative burden, improving caseworker safety, technology solutions, mental health resources for caseworkers, and recruitment campaigns to attract qualified caseworker candidates (sec. 436(b)(3) of the Act).

- **Funding:** Retains the reservation of \$20,000,000 from the mandatory appropriation for states and territories in FY 2025. In FY 2026 and each year thereafter, increases the reservation to \$26,000,000 and modifies the allotment formula by establishing a new base amount of \$100,000 (sec. 436(b)(3) of the Act).
- **Court Improvement Program:**
 - **Purpose:** Expands the program purposes to include support for assessing and implementing strategies around continuity of services including using technology to allow remote court proceedings (sec. 438(a)(1)(F), (2)(C), and (3) of the Act).
 - **Funding:** Retains the current 3.3 percent set-aside from the discretionary appropriation for FYs 2025-2029 (sec. 437(b)(2) of the Act). Retains reservation of \$30,000,000 from the mandatory appropriation for the Court Improvement Program in FY 2025. In FY 2026 and each year thereafter increases the reservation to \$40,000,000 (sec. 436(b)(1) of the Act). Increases annual funding for Tribal Court Improvement grants to \$2,000,000 from \$1,000,000 for FYs 2026-2029 (sec. 438(c)(3) of the Act).

Title IV-B, Subpart 3: Common Provisions

- **Reduction of Administrative Burden:** Requires that HHS reduce administrative burden on the title IV-B program to eliminate duplication and streamline reporting requirements to reduce the number of hours required for compliance by at least 15 percent. Within 2 years of enactment, HHS must notify grantees of any changes made and within 3 years must submit a report to Congress on efforts to comply (sec. 441 of the Act).
- **Public Access to State Plans:** Requires HHS to create a standardized title IV-B plan format, make plans available on a public website, produce comparisons and analyses of trends, and include aggregated national summaries of state submissions (sec. 442 of the Act).

Summary of Provisions Relating to Title IV-B, Subparts 1 and 2 Competitive Discretionary Grants

- **Grants Supporting Collaboration Between State Child Welfare and Juvenile Justice Systems:** Establishes a \$10,000,000 cap on grants authorized in sec. 429A to enhance collaboration between state child welfare and juvenile justice systems (sec. 423(a)(2)(A) of the Act). Continues current requirement that grants must be funded in any year in which the total appropriation for title IV-B, subpart 1 exceeds \$270,000,000.
- **Kinship Navigators:** Renames sec. 427 of the Act to *Kinship Navigators* (previously *Family Connection Grants*) and prescribes revised requirements for purposes and applications (sec. 427 of the Act). Beginning in FY 2026 and through 2029, grants are funded at \$10,000,000 annually from a set-aside in the title IV-B, subpart 2 discretionary appropriation (sec. 437(b)(6) of the Act).
- **Regional Partnership Grants (RPG):**
 - Reauthorizes appropriations through FY 2029 (sec. 437(a) of the Act).
 - Makes the following revisions: Broadens the purposes of the program to expand the scope of evidence-based services that may be approved by the Title IV-E Prevention Services Clearinghouse in sec. 476(d) of the Act; adds to the list of entities that may be partners; sufficient planning requirements; considerations in awarding grants; and the performance indicators (sec. 437(f)(1), (2), (3)(B), (6), and (8) of the Act).

- Maintains the set-aside from the title IV-B, subpart 2 mandatory appropriation of \$20,000,000 in FY 2025 and increases to \$30,000,000 for FY 2026 and each year thereafter (sec. 436(b)(4) of the Act).
- Reserves at least \$1,000,000 from the 3.3 percent set-aside in the discretionary appropriation for title IV-B, subpart 2 to support local RPG site evaluations with the goal of publishing and submitting evaluation findings to the Title IV-E Prevention Services Clearinghouse or to award grants to allow current/former RPG grantees to analyze, publish, and submit clearinghouse data collected during past grants (sec. 435(c)(1) and 437(b)(1) of the Act).
- ***Prevention Services Evaluation Partnership Grants:*** Beginning in FY 2026 and through 2029, sets aside \$5,000,000 from the title IV-B, subpart 2 discretionary appropriation for competitive grants to support the timely evaluation of Title IV-E Prevention Services in sec. 471(e) of the Act or Kinship Navigator Programs in sec. 474(a)(7) of the Act (sec. 435(f) of the Act). Provides requirements for eligible entities, grant applications, priorities, external evaluations, grantee reports, and requires HHS to report to Congress annually on the grants (sec. 435(f) and 437(b)(5) of the Act).
- ***Grants to Support Meaningful Relationships Between Foster Children and Incarcerated Parents of Children in Foster Care:*** Authorizes \$35,000,000 for each FY 2026-2029 for demonstration grants to eligible state partnerships to develop and implement support programs enabling and sustaining relationships between foster children and their incarcerated parents (sec. 439 of the Act). Prescribes requirements for eligible partnerships, program planning, grant application, program activities, technical assistance, evaluations, and reports to Congress. Allows HHS to modify grant requirements for Tribes if HHS determines it is appropriate to the needs, culture, and circumstances of the Tribe (sec. 429(g) of the Act).

Additional HHS Requirements:

- ***Effective Implementation of ICWA:*** Creates new sec. 429B of the Act on improving state compliance with ICWA.
 - Requires HHS, in consultation with Tribes and states, to develop a plan no later than October 1, 2025, to provide technical assistance to support the effective implementation of ICWA. The technical assistance plan must be based on data sufficient to assess state strengths and areas for improvement in implementing Federal standards established under ICWA (sec. 429B(a) of the Act).
 - Requires the Department of Interior, at the request of HHS, to provide guidance and assistance necessary to facilitate compliance with ICWA (sec. 429B(b) of the Act).
 - Requires HHS to report to Congress biennially on state compliance with ICWA and sec. 422(b)(9) of the Act and how HHS is assisting states and Tribes to improve implementation of Federal standards established under ICWA (sec. 429B(c) of the Act).
 - Reserves at least \$1,000,000 from the 3.3 percent set-aside in the discretionary appropriation for title IV-B, subpart 2 to support technical assistance to support the effective implementation of ICWA and the requirements in sec. 422(b)(9) of the Act (sec. 435(c)(2) of the Act).
- ***Guidelines for Court Proceedings:*** Requires HHS to issue best practice guidance every 5 years for technological changes needed for remote court proceedings. Initial guidance is due October 1, 2025. Requires HHS to consult with Tribes on the development of appropriate guidelines

for state court proceedings involving Indian children and state court proceedings that are subject to ICWA (sec. 438(e) of the Act).

- **Report to Congress on Regional Partnership Grants:** Requires that HHS include in the report to Congress on Regional Partnership Grants whether any programs funded by the grants were submitted to the Title IV-E Prevention Services Clearinghouse for review and the results (sec. 437(f)(9)(B)(iv) of the Act).
- **Guidance to States on Improving Data Collection and Reporting for Youth in Residential Treatment Programs:** Within 2 years of enactment, HHS, in collaboration with several Federal agencies and other policy experts, must issue best practice guidance to state title IVE and IV-B agencies on collecting, sharing, and improving data collection on youth residing in residential treatment facilities and improving oversight of these facilities (sec. 114 of Pub. L. 118-258).
- **Report on Post Adoption and Subsidized Guardianship Services:** Within 2 years of enactment, HHS must report to Congress on children who enter foster care after an adoption or legal guardianship. The report must include information on the circumstances of adoption disruptions and dissolutions, services received, and available services and funding in each state (sec. 116 of Pub. L. 118-258).

INQUIRIES: Contact the appropriate Regional email contact listed below.

Region 1: CBRegion1@acf.hhs.gov
Region 2: CBRegion2@acf.hhs.gov
Region 3: CBRegion3@acf.hhs.gov
Region 4: CBRegion4@acf.hhs.gov
Region 5: CBRegion5@acf.hhs.gov
Region 6: CBRegion6@acf.hhs.gov
Region 7: CBRegion7@acf.hhs.gov
Region 8: CBRegion8@acf.hhs.gov
Region 9: CBRegion9@acf.hhs.gov
Region 10: CBRegion10@acf.hhs.gov

/s/

Joseph Bock
Acting Commissioner
Administration on Children, Youth and
Families

Attachments:

A – [Public Law 118-258](#)

Disclaimer: Information Memoranda (IMs) provide information or recommendations to states, Indian tribes, grantees, and others on a variety of child welfare issues. IMs do not establish requirements or supersede existing laws or official guidance.

ATTACHMENT B

Summary of Provisions

The Supporting America’s Children and Families Act (P.L. 118-258), signed into law on January 4, 2025, reauthorizes programs funded under title IV-B of the Social Security Act (the Act). Below is a summary of provisions that impact Indian tribes, Indian tribal organizations and consortia (Tribes).

Provision	Description
Title IV-B, Subpart 1 Plans Sec.422(b)(9)	Amends the requirement for the State to consult with Tribes on State compliance with ICWA to also require States to describe how the State will ensure timely notice to Indian Tribes of State custody proceedings and placements involving Indian children, and case recordkeeping related to transfers of jurisdiction, termination of parental rights, and active efforts.
Allotments Subpart 1, Sec. 423(a)(1)	Amends the requirement that for each fiscal year, the amounts in sec. 428(a) of the Act for Tribes must be allotted before the State allotments.
Kinship Navigators Sec. 427(b)(6)	Adds a new application requirement for Kinship Navigator grants that a State/local/Tribal child welfare agency must document support from a relevant community-based organization with experience serving kinship families or describe how it will coordinate its services with those offered by such organizations.
Payments to Indian Tribal Organizations (ITOs) Sec. 428(a)	For direct payment to Tribes, HHS must reserve 3% from the title IV-B, subpart 1 appropriation and pay directly to Indian Tribes and Tribal organizations that have an approved title IV-B, subpart 1 plan.
Payments to ITOs Sec. 428(b)	Requires HHS to modify any title IV-B, subpart 1 reporting requirement for Tribes whose title IV-B, subpart 1 allotment is \$50,000 or less in a federal fiscal year.
Payments to ITOs Sec. 428(c)	Allows Tribes to substitute a weighted average of federally negotiated indirect cost rates for administrative cost caps in sec. 422(b)(14) and 424(e) of the Act.
Effective Implementation of ICWA Sec. 429B	Requires HHS to consult with States and Tribes to develop a plan and provide technical assistance (TA) for States to support effective implementation of ICWA. The TA plan must include specific measures identified in State plans required by the amendments to sec. 422(b)(9) of the Act, and it must be based on data sufficient to assess State strengths and areas for improvement in implementing ICWA’s requirements, such as timely identification of Indian children and active efforts to prevent the breakup of the Indian family. Requires the Department of Interior to provide HHS with guidance and assistance as necessary.
Title IV-B, Subpart 2 Plans Sec. 432(b)(2)(B)	Revises the requirement that Tribes must qualify for a grant of at least \$10,000 to be able to receive a title IV-B, subpart 2 to consider both the mandatory and discretionary appropriations in the determination.

Provision	Description
Evaluation, Research, Technical Assistance Sec. 435(d)(6) and (f)	Requires HHS to provide TA to States and Tribes for grants under sec. 437(f) in coordination with other federal funds to serve families affected by substance use disorder. Beginning in FY 2026 through 2029, authorizes competitive grants to support the timely evaluation of Title IV-E Prevention Services or Kinship Navigator Programs.
Title IV-B, Subpart 2 Appropriations Sec. 436(b)(2)	Beginning in FY 2026 the 3% Tribal set aside is applied to the full mandatory appropriation before set-asides for RPG and caseworker visit grants.
Court Improvement Program Sec. 438(c) and (e)	Increase funding for Tribal court improvement programs from \$1 million to \$2 million for FYs 2026-2029. Requires HHS to issue best practice guidance every 5 years for technological changes needed for remote court proceedings. Also requires HHS to consult with Indian tribes on the development of appropriate guidelines for state court proceedings subject to ICWA.
Reduction of Administrative Burden Sec. 441(a)(4)	Requires HHS to reduce administrative burden on title IV-B program grantees by eliminating duplication and streamlining reporting requirements in a way that respects the sovereignty of Indian tribes.
Effective Date	The amendments take effect on October 1, 2025, and apply to payments under title IV-B for calendar quarters beginning on or after such date. The Secretary must provide Tribes additional time to comply if determined necessary.

ATTACHMENT C

Framing Questions

Questions for Comment

- I. *Technical Assistance Related to ICWA.* As stated above, P.L. 118-258 requires HHS to develop a plan to provide TA to support the effective implementation of ICWA.
 - a. What barriers has your state/Tribe experienced in effectively implementing ICWA, including these specific topics:
 - Timely identification of Indian children and extended family members.
 - Timely notice of state child custody proceedings involving an Indian child to the Tribe(s).
 - Transfer of jurisdiction under ICWA.
 - Active efforts to prevent the breakup of the Indian family and meeting evidentiary standards, including testimony of a qualified expert witness for placements into foster care and terminations of parental rights.
 - Placements of children that meet the placement preferences of ICWA.
 - b. Has your state/Tribe identified a method of receiving TA that worked well in the past? Can your state/Tribe identify a method of receiving TA that did not work?
 - c. What existing state-Tribe partnerships or processes are helpful in effectively implementing ICWA?
 - d. How could HHS coordinate with the Department of Interior (DOI) in working on a technical assistance plan? How could HHS, DOI and other Federal agencies coordinate to provide effective TA for ICWA implementation?
 - e. What data is needed to know whether TA is effective?
 - f. Are there specific supports ACF could provide to help state courts and child welfare agencies address barriers to effectively implement ICWA?
 - g. What additional supports would Tribes find helpful to build their capacity to respond to ICWA notices, attend court hearings, and certify foster families under ICWA?
- II. *Reducing Administrative Burden.* As stated above, P.L. 118-258 requires that HHS reduce the administrative burden for administering the title IV-B program, and it allows HHS to modify any title IV-B reporting requirement for Tribes whose allotment under title IV-B, subpart 1 is less than \$50,000 for a FY.
 - a. How does your state/Tribe use the information reported in the CFSP, APSR, and CFS-101 for non-federal purposes, for example, in collaborative efforts with multi-disciplinary groups, reports to internal agency leadership or the State legislature/Tribal governing body?
 - b. Regarding title IV-B subpart 1 and 2 requirements: What suggestions does your state/Tribe have to streamline reporting on programmatic work and expenditures and that would ensure consistency with standards and guidelines for other Federal formula grant programs? Please identify the specific requirement and note information that is duplicative or where the cost to report on it outweighs any benefits provided through the funding.
 - c. Currently, information on the Child Abuse and Prevention Treatment Act (CAPTA) and the Chafee program are reported on the CFSP, APSR, and CFS-101 to ensure consistent reporting across these programs. Does your state/Tribe believe that continuing to combine these requirements into an integrated plan is the least burdensome way to administer and report on administering the title IV-B, Chafee, and CAPTA programs? Would it be more efficient to require that agencies submit a stand-alone application/report separately for each

program? Does your state/Tribe have input on changes that would better ensure consistency across fiscal reporting for these programs? We also appreciate comments on what streamlined reporting may look like.

- d. Currently, Tribes that submit a CFSP have the option to use a preprint template (see Attachment H to ACF-ACYF-CB-PI-24-03). States do not use a template. Does your state/Tribe believe that a template format for a streamlined CFSP/APSR would be helpful? If so, how?
- e. Does your state/Tribe have suggestions for improvements to the CFS-101 that would be less burden on your agency and improve fiscal reporting consistent with standards and guidelines for other Federal formula grant programs?
- f. What title IV-B reporting requirements for Tribes whose allotment under title IV-B, subpart 1 is less than \$50,000 for a FY can be modified to reduce administrative burden on these Tribal grantees?
- g. When streamlining and eliminating duplication of reporting requirements and making changes to ensure consistency for fiscal reporting, what concerns regarding Tribal sovereignty might you have?

III. *Court Improvement Program.* As stated above, P.L. 118-258 requires HHS to issue best practice guidance every five years for technological changes needed for remote court proceedings and to consult with Tribes on the development of appropriate guidelines for state court proceedings involving Indian children and state court proceedings that are subject to ICWA. Additionally, ACF is seeking input on the Tribal Court Improvement Program grant ceiling.

- a. What are the technological barriers and resources/capacity barriers to participating in virtual court hearings?
- b. What should ACF include in guidance for state courts to ensure appropriate engagement of Tribes in state court proceedings subject to ICWA that are conducted remotely? What practice issues are important to address in ICWA cases that are conducted remotely?
- c. Are there particular considerations for individuals in different roles (for example, qualified expert witnesses, Tribal attorneys) participating remotely in these cases?
- d. Currently, Court Improvement grants for Tribes have a \$150,000 award ceiling. With the increase in the total authorization available for funding Tribal Court Improvement Program grants, does your Tribe think there should be adjustments to the amount or approach to the award ceiling? If yes, what are your suggestions? How does the current ceiling, or your suggestions for a new ceiling, impact small, medium, and larger Tribal courts?

IV. *Increasing Studies of Programs and Services Eligible for Review by the Title IV-E Prevention Services Clearinghouse.* As stated above, P.L. 118-258 set aside funding for competitive grants intended to increase the pool of evidence-based programs and services in the Clearinghouse.

- a. How can ACF structure these grants to build evidence for program and services that are adapted to the culture and context of the Tribal communities served and eligible for review by the Clearinghouse?
- b. What TA do states and Tribes need to be able to successfully engage individuals with lived expertise to develop and study new or adapted programs and services that are eligible for review by the Clearinghouse?

Attachment D

Side By Side Comparison

Sec. 422(b)(9): State must describe how it will comply with specific list of ICWA requirements

Old Language	As Amended by P.L. 118-258
(9) contain a description, developed after consultation with tribal organizations (as defined in section 4 of the Indian Self Determination and Education Assistance Act) in the State, of the specific measures taken by the State to comply with the Indian Child Welfare Act;	(9) contain a description, developed after consultation with tribal organizations (as defined in section 4 of the Indian Self Determination and Education Assistance Act) in the State, of the specific measures taken by the State to comply with the Indian Child Welfare Act of 1978, including how the State will ensure timely notice to Indian tribes of State custody proceedings involving Indian children, foster care or adoptive placements of Indian children, and case recordkeeping as such matters relate to transfers of jurisdiction, termination of parental rights, and active efforts;

Sec. 429B: HHS to consult with Tribes and states to develop a plan and provide technical assistance to states to support effective implementation of ICWA

Old Language	As Amended by P.L. 118-258
N/A	EFFECTIVE IMPLEMENTATION OF THE INDIAN CHILD WELFARE ACT OF 1978 SEC. 429B. [42 USC 629d.] (a) IN GENERAL.—Not later than October 1, 2025, the Secretary, in consultation with Indian tribal organizations and States, shall develop a plan and provide technical assistance supporting effective implementation of the Indian Child Welfare Act of 1978, including specific measures identified in State plans as required by section 422(b)(9) of this Act. The technical assistance plan shall be based on data sufficient to assess State strengths and areas for improvement in implementing Federal standards established under the Indian Child Welfare Act of 1978, including, at a minimum, the following: (1) Timely identification of Indian children and extended family members. (2) Timely tribal notice of State child custody proceedings involving an Indian child. (3) Reports of cases in which a transfer of jurisdiction (as defined under the Indian Child Welfare Act of 1978) was granted or was not granted, and reasons specified for denial in cases where transfer was denied. (4) In cases in which a State court orders a foster care placement of an Indian child, whether requirements for active efforts to prevent the breakup of the Indian family, testimony of a qualified expert witness, and evidentiary standards were met. (5) Whether an Indian child was placed in a placement that is required to be preferred under the Indian Child Welfare Act of 1978, and if not, the reasons specified. (6) In cases in which a State court orders the termination of parental rights to an Indian child, whether requirements for active efforts to prevent the breakup of the Indian family, testimony of a qualified expert witness, and evidentiary standards were met. (b) INTERAGENCY COORDINATION.—On request of the Secretary, the Secretary of the Interior shall provide the Secretary with such guidance and assistance as may be necessary to facilitate informing States and public child welfare agencies on how to comply with the Indian Child Welfare Act of 1978, including specific measures identified in State plans as required by section 422(b)(9) of this Act. (c) BIENNIAL REPORTS TO CONGRESS.—The Secretary shall biennially submit to the Committee on Ways and Means of the House of Representatives and the Committee on Finance of the Senate a written report on how— (1) the States are complying with the Indian Child Welfare Act of 1978 and section 422(b)(9) of this Act, as informed by data collected under this section; and (2) the Secretary is assisting States and Indian tribes to improve implementation of Federal standards established under the Indian Child Welfare Act of 1978.

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Sec. 441: Reduction of Administrative Burden in Title IV-B

Old Language	As Amended by P.L. 118-258
N/A	REDUCTION OF ADMINISTRATIVE BURDEN SEC. 441. [42 USC 6291] (a) IN GENERAL.—The Secretary shall reduce the burden of administering this part imposed on the recipients of funds under this part, by— (1) reviewing and revising administrative data collection instruments and forms to eliminate duplication and streamline reporting requirements for the recipients while collecting all data required under this part; (2) in coordination with activities required under the Paperwork Reduction Act, conducting an analysis of the total number of hours reported by the recipients to comply with paperwork requirements and exploring, in consultation with the recipients, how to reduce the number of hours required for the compliance by at least 15 percent; (3) collecting input from the recipients with respect to fiscal and oversight requirements and making changes to ensure consistency with standards and guidelines for other Federal formula grant programs based on the input; and (4) respecting the sovereignty of Indian tribes when complying with this subsection. (b) LIMITATION ON APPLICABILITY.—Subsection (a) of this section shall not apply to any reporting or data collection otherwise required by law that would affect the ability of the Secretary to monitor and ensure compliance with State plans approved under this part or ensure that funds are expended consistent with this part.

Sec. 428(b): Modify any title IV-B, subpart 1 reporting requirement for Tribes w/a subpart 1 allotment of \$50,000 or less/FY

Old Language	As Amended by P.L. 118-258
(b) Amounts paid under subsection (a) shall be deemed to be a part of the allotment (as determined under section 421) for the State in which such Indian tribal organization is located.	(b) AUTHORITY TO STREAMLINE REPORTING REQUIREMENTS.--The Secretary shall, in consultation with the affected Indian tribes, modify any reporting requirement imposed by or under this part on an Indian tribe, tribal organization, or tribal consortium if the total of the amounts allotted to the Indian tribe, tribal organization, or tribal consortium under this part for the fiscal year is not more than \$50,000, and in a manner that limits the administrative burden on any tribe to which not more than \$50,000 is allotted under this subpart for the fiscal year.

Sec. 438(c)(3): Increases CIP allocation for Tribes for FYs 2026-2029

Old Language	As Amended by P.L. 118-258
(3) INDIAN TRIBES.—From the amounts reserved under section 436(b)(2) for a fiscal year, the Secretary shall, before applying paragraph (1) of this subsection, allocate \$1,000,000 for grants to be awarded on a competitive basis among the highest courts of Indian tribes or tribal consortia that— (A) are operating a program under part E, in accordance with section 479B; (B) are seeking to operate a program under part E and have received an implementation grant under section 476; or (C) have a court responsible for proceedings related to foster care or adoption.	(3) INDIAN TRIBES.—From the amounts reserved under section 436(b)(1) for a fiscal year, the Secretary shall, before applying paragraph (1) of this subsection, allocate \$1,000,000 for fiscal year 2025, and \$2,000,000 for each of fiscal years 2026 through 2029 for grants to be awarded on a competitive basis among the highest courts of Indian tribes or tribal consortia that— (A) are operating a program under part E, in accordance with section 479B; (B) are seeking to operate a program under part E and have received an implementation grant under section 476; or (C) have a court responsible for proceedings related to foster care or adoption.

Sec. 438(e): HHS to issue best practices for technological changes needed for remote court proceedings and consult with Tribes on guidelines for state court proceedings subject to ICWA

Old Language	As Amended by P.L. 118-258
N/A	(e) GUIDANCE.— (1) IN GENERAL.—Every 5 years, the Secretary shall issue implementation guidance for sharing information on best practices for— (A) technological changes needed for court proceedings for foster care, guardianship, or adoption to be conducted remotely in a way that maximizes engagement and protects the privacy of participants; and (B) the manner in which the proceedings should be conducted. (2) INITIAL ISSUANCE.—The Secretary shall issue initial guidance required by paragraph (1) with preliminary information on best practices not later than October 1, 2025. (3) ADDITIONAL CONSULTATION.—The Secretary shall consult with Indian tribes on the development of appropriate guidelines for State court proceedings involving Indian children to maximize engagement of Indian tribes and provide appropriate guidelines on conducting State court proceedings subject to the Indian Child Welfare Act of 1978 (25 U.S.C. 1901 et seq.)

Sec. 435(f): New Competitive Prevention Services Evaluation Partnership Grants

Old Language	As Amended by P.L. 118-258
N/A	(I) PREVENTION SERVICES EVALUATION PARTNERSHIPS. — (1) PURPOSE.—The purpose of this subsection is to authorize the Secretary to make competitive grants to support the timely evaluation of— (A) services and programs described in section 471(e), or (B) tribalship navigator programs described in section 474(a)(7). (2) GRANTS.—In accordance with applications approved under this subsection, the Secretary may make grants, on a competitive basis, to eligible entities to carry out projects designed to evaluate a service or program provided by the eligible entity, or an entity in partnership with the eligible entity, with respect to the requirements for a promising practice, supported practice, or well-supported practice as described in section 471(e)(4)(C). (3) APPLICATIONS.— (A) IN GENERAL.—An eligible entity may apply to the Secretary for a grant under this subsection to carry out a project that meets the following requirements: (i) The project is designed in accordance with paragraph (2). (ii) The project is to be carried out by the applicant in partnership with— (I) a State agency that administers, or supervises the administration of, the State plan approved under part E, or an agency administering the plan under the supervision of the State agency; and (II) if the applicant is unable or unwilling to do so, at least 1 external evaluator to carry out the evaluation of the service or program provided by the applicant. (B) CONTENTS.—The application shall contain the following: (i) A description of the project, including— (I) a statement explaining why a grant is necessary to carry out the project; and (II) the amount of grant funds that would be disbursed to each entity described in subparagraph (A)(i) in partnership with the applicant. (ii) A certification from each entity described in subparagraph (A)(i) that provides assurances that the individual or entity is in partnership with the applicant and will fulfill the responsibilities of the entity specified in the description provided pursuant to clause (i) of this subparagraph. (iii) A certification from the applicant that provides assurances that the applicant intends to comply with subparagraph (A)(i)(II). If applicable, (iv) At the option of the eligible entity, a certification from the applicant that the applicant requires an external evaluator secured by the Secretary pursuant to paragraph (5), if applicable.

Sec. 435(f), cont.

Old Language	As Amended by P.L. 118-258
N/A	(4) PRIORITIES.—In approving applications under this subsection, the Secretary shall prioritize the following: (A) Addressing, with respect to the clearinghouse of practices described in section 476(d)(2), deficiencies or gaps identified by the Secretary in consultation with— (i) States, political subdivisions of a State, and tribal communities carrying out, or receiving the benefits of, a service or program; and (ii) child welfare experts, including individuals with lived experience. (B) Maximizing the number of evidence-based services or programs to be included in the clearinghouse of practices described in section 476(d)(2). (C) Timely completion of evaluations and the production of evidence. (D) Supporting services or programs that are based on, or are adaptations to new population settings of, a service or program with reliable evidence about the benefits and risks of the service or program. (5) AVAILABILITY OF EXTERNAL EVALUATORS. — (A) In general.—Before accepting applications under this subsection, the Secretary shall make reasonable efforts to identify at least 1 entity to serve as an external evaluator for any eligible entity that includes a certification under paragraph (3)(B)(iv) with an application under this subsection. (B) NO EFFECT ON CONSIDERATION OF APPLICATION. —The Secretary may not consider whether an eligible entity is in partnership with an external evaluator described in paragraph (A) in approving an application under this subsection submitted by the eligible entity. (6) REPORTS. — (A) BY GRANT RECIPIENTS. —Within 1 year after receiving a grant under this subsection, and every year thereafter for the next 5 years, the grant recipient shall submit to the Secretary a written report or— (i) the use of grant funds; (ii) whether the program or service evaluated by the project meets a requirement specified in section 471(e)(4)(C), including information about— (I) how the program or service is being carried out in accordance with standards specified in the requirement; (II) any outcomes of the program or service; and (III) any outcome with respect to which the service or program compares favorably to a comparison practice; and (iii) whether the Secretary has included the program or service in an update to the clearinghouse of practices described in section 476(d)(2).

Sec. 435(f), cont.

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Old Language	As Amended by P.L. 118-258
N/A	(B) BY THE SECRETARY.—The Secretary shall submit to the Committee on Ways and Means of the House of Representatives and to the Committee on Finance of the Senate an annual written report or— (i) the grants awarded under this subsection; (ii) the programs funded by the grants; (iii) any technical assistance provided by the Secretary in carrying out this subsection, including with respect to the efforts to secure external evaluations pursuant to paragraph (5); and (iv) any efforts by the Secretary to support program evaluation and review pursuant to section 471(e) and inclusion of programs in the pre-approved list of services and programs described in section 471(e)(4)(D) or the clearinghouse of practices described in section 476(d)(2). (7) FUNDING.— (A) LIMITATIONS.—Of the amounts available to carry out this subsection, the Secretary may use not more than 5 percent to provide technical assistance. (B) CARRYOVER.—Amounts made available to carry out this subsection shall remain available until expended. (8) DEFINITIONS.—In this subsection: (A) ELIGIBLE ENTITY.—The term “eligible entity” means any of the following providing a service or program or, in the sole determination of the Secretary, able to provide a service or program if awarded a grant under this subsection: (i) A State, a political subdivision of a State, or an agency or department of a State or political subdivision of a State; (ii) An entity described in subparagraph (A) or (B) of section 426(a)(1). (iii) An Indian tribe or tribal organization. (B) EXTERNAL EVALUATOR.—The term “external evaluator” means an entity with the ability and willingness to evaluate a service or program pursuant to paragraph (2) that is not provided by the entity. (C) SERVICE OR PROGRAM.—The term “service or program”— (i) means a service or program described in section 471(e); and (ii) includes a kinship navigator program described in section 474(a)(7).

Sec. 427(b)(3): Kinship Navigators Program Evaluations to increase programs approved by the title IV-E Prevention Clearinghouse

Old Language	As Amended by P.L. 118-258
(3) if the entity is a private organization— (A) documentation of support from the relevant local or State child welfare agency; or (B) a description of how the organization plans to coordinate its services and activities with those offered by the relevant local or State child welfare agency; <i>(note that this was renumbered to be (b)(4))</i>	(3) a description of how the entity will directly fund, or provide data to the Secretary for, an evaluation which will publish and submit information to the clearinghouse described in section 476(d)(2) and which is designed to meet the requirements of section 471(e)(4)(C), or a description of how the funds will be used to help the State transition to a program for which the State will seek reimbursement under section 474(a)(7);