



NICWA

National Indian Child Welfare Association
Protecting Our Children • Preserving Our Culture

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Administration for Children and Families
Department of Health and Human Services
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Transmitted via email at tribalaffairs@acf.hhs.gov

RE: Written Comments in Response to the Administration for Children and Families' Annual Tribal Consultation on August 25–26, 2026.

Dear Assistant Secretary Adams,

Please accept the comments of the National Indian Child Welfare Association (NICWA) as part of the ACF Tribal Consultation record (held August 25–26). NICWA is a private, Native nonprofit organization headquartered in Portland, Oregon. We are dedicated to the well-being of Native children and families and carry out our mission through public policy and advocacy, research, community development, and training and technical assistance with Tribal, state, federal, and private agencies. We have extensive knowledge and expertise in federal child welfare programming, including the Department of Health and Human Services (HHS) programs under Title IV-B and Title IV-E of the Social Security Act. Our comments will focus on ACF's priorities and a few other issues that impact Native children and families.

CHILD WELFARE

A Home for Every Child Initiative

We see an opportunity for ACF to work with Tribal Nations to incorporate unique Tribal considerations into the *A Home for Every Child* initiative. Ensuring that every Native child has a home, and a family, is a critical responsibility of Tribal governments with the federal government's support, whether these children are under the jurisdiction of a Tribal Nation or state government. Nevertheless, discharging this responsibility to Native children and families requires an understanding of the harm caused by removing Native children from their culture and community, that "family" means more than the "nuclear family" in Tribal communities and involves extended family connections, and that compliance with ICWA when identifying permanent placements for

Native children is paramount to their safety and well-being, protecting their family connections, and respecting Tribal sovereignty and self-determination.

These are unique considerations that may not arise when implementing *A Home for Every Child* in non-Tribal communities. Tribal Nations can assist ACF, in a government-to-government capacity, to ensure the initiative is successful in Indian Country. Tribal consultation is necessary to achieve this goal, and we urge you to conduct Tribal consultation on ACF's implementation of Executive Order 14359, *Fostering the Future for America's Children and Families*. Tribal consultation will help ACF identify ways Tribal Nations are already leveraging federal and state funds to support safety and permanency for Native children in the child welfare system, in both Tribal and off-reservation areas. Below are a few examples.

- The Port Gamble S'Klallam Tribe (PGST) in Washington State revised their licensing requirements and definition of “relative” to be more aligned with their cultural teachings about the role of extended family in a child’s life. PGST also increased their support for families interested in becoming a foster parent or guardian home by creating additional incentives for becoming a resource family, increasing support during the licensing process and during placement, and creating community pride in becoming a resource family.
- Numerous Tribes and urban Indian organizations have also assisted states in recruiting, licensing, and retaining foster care, relative care, guardianship, and adoptive homes for Native children. The firsthand knowledge that Tribes and Indian organizations have in how best to locate and license appropriate family homes is key to increasing the number of family homes and retaining them over the long term. To harness this knowledge, states, counties, and cities using state and federal funding have joined into partnership with Tribes and urban Indian organizations to meet the challenges of finding and licensing family homes.
- From the prevention-first lens of *A Home for Every Child*, we can look to the Osage Nation. The Osage Nation has implemented a “whatever-it-takes” approach to child welfare, an effort to prevent foster care entries, reduce trauma, and get families the help they need. This includes meeting families where they are and attending community events to distribute essential supports like free food, diapers, medication lock boxes, and fentanyl test kits. As a result of this approach, a recent report highlights stark changes in foster care entries. In February 2023, there were 27 Osage children in Tribal foster care, and then as prevention strategies were established, not a single child was in the Osage foster care system in July 2024 and the number of children in care has remained in single digits since (Casey Family Programs, 2026). Osage Nation social services has changed their approach to serving families, in part by increasing the number of staff (including staff with lived experience in the child welfare system) and directing their Family First Prevention Services funding to address child neglect, which Tribal data shows is the most commonly reported allegation of maltreatment and largely driven by substance use and domestic violence exposure. By prioritizing this unified “whatever-it-takes” approach, Osage Nation has demonstrated that focusing on proactive community engagement and relationship building with parents, caregivers, and community partners, as well as focused attention to reducing stressors and preventing future crises, showing up for every child, and supporting staff development can help keep families safely together.
- Tribal Nations, like the Confederated Tribes of Umatilla Indian Reservation in Oregon and the Red Lake Nation in Minnesota, have also reformed their child welfare systems to

dramatically reduce the need for foster care placement by engaging with at-risk families earlier and more actively. In these communities, foster care rates have been reduced anywhere from 40% to 70% from earlier numbers before reforms were implemented. The system reforms included greater collaboration among collateral agencies, improved data tracking of family needs and progress, cross-discipline training for front-line workers and supervisors, and earlier identification of families at risk for child abuse and neglect.

For many Native children, they can stay at home safely with their families and avoid the trauma of out-of-home placement when prevention services are in place early and are matched to their needs. We also know that reducing foster care placements generates savings that can be reinvested into upstream prevention and integrated family services, including housing, mental health, substance abuse, victim services, and financial assistance (e.g., Temporary Assistance for Needy Families). These are important examples of how Tribal Nations are leading the way in reducing foster care numbers and improving permanency for Native children.

We believe there are opportunities for *A Home for Every Child* to leverage and invest in the good work Tribal Nations are doing to support child safety and permanency in their communities. This initiative is an opportunity to continue prioritizing Tribally driven solutions that focus on building sustainable programs that will support Native children and families for generations to come.

Title IV-E Prevention Services Program

Tribal access to Title IV-E Prevention Services allows Tribal Nations to administer culturally based child welfare services using a federal reimbursement system for eligible services. However, many Tribal Nations face significant barriers to participation in Title IV-E generally and Prevention Services more specifically. These barriers include complex evidence-based practice requirements that often fail to recognize culturally based services, substantial administrative and data-infrastructure costs, and insufficient access to non-federal matching funds.

To operate Title IV-E directly, a Tribe must meet complex data-tracking, financial management, and legal requirements that are often difficult for smaller or resource-constrained Tribes to navigate. Out of the 576 federally recognized Tribes, fewer than 15 Tribes are directly implementing, or in the process of implementing, the program, and as of December 2025, only four Tribes have approved prevention plans. If a Tribe cannot directly administer the program, the only other option is to enter into a Tribal-State agreement. This forces sovereign Tribal Nations to rely on the willingness of a state government to collaborate and follow the structure and options contained within the state Title IV-E plan. Some state plans do not include access to the Prevention Services program, while others focus on evidence-based programs or services that are not culturally appropriate or effective with Native children and families. With the differences in state approaches to Title IV-E plans, Tribal Nations, especially those with fewer resources, may find that Tribal-state agreements don't provide the program flexibility and access to Title IV-E funding that they need.

A solution to address many of the barriers Tribal Nations face in participating in Title IV-E Prevention Services would be to allow Tribal Nations to operate the Prevention Services program as a stand-alone program. Historically, ACF has asserted that Tribal Nations must operate the Foster Care and Adoption Assistance components of Title IV-E to also operate the Prevention Services program. This solution has the greatest potential for assisting Tribes in reducing the number of foster care placements and supporting caregivers who need additional support to care for children

safely at home. Concerns about whether Tribal Nations should also be operating the Foster Care and Adoption Assistance services to also operate Title IV-E Prevention Services should also take into consideration that many smaller, less resourced Tribes are providing foster care and adoption assistance through arrangements with a state or county that is operating Title IV-E programs.

We encourage ACF to work with Tribal Nations to reinterpret the requirement that Tribal Nations must operate the Title IV-E Foster Care and Adoption Assistance programs in order to operate the Title IV-E Prevention Services program, so that Tribal Nations can operate Title IV-E Prevention Services as a stand-alone program. We recognize that this would directly advance the agency's goals of preventing foster care entries and keeping families together.

Child Welfare Grantmaking

Federal Notices of Funding Opportunities (NOFOs) are increasingly coming out much later in the calendar year. This trend has disrupted the traditional grant cycle, creating a landscape characterized by administrative delays, and accumulation of "forecasted" but unreleased grants, and compressed application windows. We recognize that this rushes the backend of the grant process, both the window of time that grantees have to apply, and the agency's review of applications and eventual announcement of awardees.

When federal agencies delay releasing NOFOs, the burden shifts to Tribal administrators who are forced to scramble through abbreviated 30-day application windows and navigate submissions for multiple federal grant opportunities with similar deadlines. This is concerning given complex federal grants demand significant preparation time, yet Tribal communities often operate with vastly different levels of administrative resources and staff capacity. When staff and resource capacity are strained, Tribal Nations have to make forced trade-offs. Instead of strategically pursuing all viable grants that align with community needs, Tribal Nations are backed into a corner—triaging their options and sometimes abandoning highly competitive funding opportunities because they lack the time, data, or internal resources to cross the finish line. Nevertheless, with timely information and support, Tribes can stop playing catch-up and confidently execute a proactive, full-scale funding strategy.

Moving forward, we ask that ACF provide transparent, reliable forecasts for when funding notices will drop, so Tribal Nations are not caught off-guard. Granting adequate time isn't just a matter of administrative convenience; it is a structural necessity that honors federal trust responsibilities and respects Tribal self-determination. Timely notice and technical support ensure Tribal Nations can engage in the competitive grant process and successfully secure funds for their communities. We also encourage ACF to work with Tribal Nations to address challenges related to the competitive grant process. Tribal Nations are often pitted against each other for few awards and fewer federal dollars. This could help ensure that Tribes with less capacity also have access to federal child welfare funding.

We are also interested in learning more about how Artificial Intelligence (AI) systems are being used by ACF to make funding and policy decisions that impact Tribal Nations and Native families. For example, is AI being used to review grant applications or write consultation reports? We have concerns that AI systems might not fully capture culture and community variances and nuances across Indian Country, resulting in disadvantages for Tribal Nations. We would like to know when the agency utilizes AI systems to make funding and policy decisions that impact Tribal Nations and

Native families, along with the specific safeguards and protocols used to ensure bias mitigation, transparency, privacy, and accountability.

Indian Child Welfare Act Data Elements in the Adoption and Foster Care Analysis and Reporting System

ACF published a final rule in 2024 requiring states to collect and report data on Indian Child Welfare Act (ICWA) cases involving Native children and families in state child welfare systems. The data elements contained in the Adoption and Foster Care Analysis and Reporting System (AFCARS) final rule were a monumental decision to establish the first federal data elements capable of providing detailed information on ICWA implementation and outcomes for Native children and families. The data elements in the 2024 final rule align with ICWA requirements and enable Tribes, states, and federal agencies to gain a more detailed understanding of service trends and outcomes—such as efforts to prevent removal, support reunification, track out-of-home placements, and identify barriers to achieving permanency for Native children. Thirty years without specific data that focuses on the unique needs and political status of Native children has contributed significantly to the inability to improve outcomes for Native children and families in state child welfare systems.

We appreciate recent assurances that ACF will implement the AFCARS 2024 final rule. Tribal Nations have advocated for this data since 1996 to fill a gap in critical data addressing the well-being of Native children in state child welfare systems. Additionally, this data will help ACF fulfill its requirements to provide reports to Congress on how states are complying with ICWA's requirements (42 U.S.C. § 628d).

We would like an update on how ACF plans to support states and Tribes in their efforts to integrate these new data elements in state data systems. Many Tribal Nations have already been working with their state on this data integration, and they and others could use technical assistance to support implementation. Sharing a detailed plan will help set clear expectations on the level of support ACF will provide and a smooth integration of these data elements into state data systems prior to collection of the data beginning in October 2028.

Child Safety and Systems

Tribal child welfare systems represent a variety of service capacities and methods for protecting the safety of Native children and supporting Tribal families. The diversity within Indian Country is also its strength, as Tribal communities adapt and operate services to their culture and local needs to ensure Native children are safe, and that Tribal families feel supported in their role as parents.

Increasingly, Tribal Nations are finding that Indigenizing their child welfare systems presents new opportunities to reach families sooner, and reduces the need for foster care placement. Numerous Tribal Nations have reduced their foster care removal rates anywhere from 25% to 70%, while keeping Native children safe and strengthening families so they can avoid long stays in the child welfare system and prevent re-entry into the child welfare system. Challenges to sustaining these reforms are often related to how flexible funding sources are in supporting Tribal cultural services, and whether the amount of funding is sufficient to support systems change.

We understand that ACF was interested in discussing Plans of State Care required under the Child Abuse Prevention and Treatment Act for states, working with caregivers who have substance abuse disorders, and data collection through the Comprehensive Child Welfare Information Systems at this consultation. We are interested in why ACF chose to focus on Plans of State Care as the focal point, given this a federal requirement that applies to states, and not Tribes, under the Child Abuse Prevention and Treatment Act (42 U.S.C. § 5106a(b)(2)(B)(iii)). If ACF is interested in discussing this requirement with Tribal Nations, additional context would be helpful to better understand ACF's thinking about the application of this requirement in Indian Country.

Burden Reduction

On the final agenda, ACF was seeking feedback on the Children's Bureau's (CB) recent efforts to reduce the amount of reporting and other documentation burdens. Administrative burden reduction, like reducing the length of applications for the Child and Family Services Plan, is very helpful, but we believe there may be additional areas for burden reduction. It could be helpful to ask Tribal grantees for specific examples of burden reduction, possibly through a survey or regional conversation, to move this work forward. We also think it would help to specifically highlight the changes ACF has already made, and communicate this to Tribal grantees, such as in email communication that reaches Tribal child welfare directors. Overall, we request that CB provide timely opportunities for Tribal Nations to learn from CB about their burden reduction goals, share Tribal experiences, and provide examples of burden reduction that would be effective.

ADMINISTRATIVE BURDEN REDUCTION AND DEREGULATION

We appreciate ACF's desire to improve regulations to support program effectiveness and efficiency. For Tribal Nations, supporting policy changes that further Tribal self-governance and self-determination principles is in alignment with the federal trust relationship. Examples of current federal policy that can be a model for future changes include empowering Tribal Nations to utilize community standards for determining program eligibility for Head Start programs operating in Tribal communities, allowing Tribal Nations to select which eligible child welfare services to concentrate their Title IV-B, Subpart 2 funding in, authorizing Tribal Nations that operate the Title IV-E Prevention Services program to utilize cultural standards to define what is an eligible prevention service and trauma-informed service, and Public Law 102-477 that allows Tribal Nations to streamline and consolidate administrative requirements between various federal human service programs that address training, employment, and related services. Another example of regulatory changes that positively support Tribal Nations is outlined in the Supporting America's Children and Families Act (P.L. 118-258), specifically to reduce Title IV-B child welfare reporting burdens. ACF approached this change by reducing the length of Child and Family Services Plan (CFSP) applications. By providing tailored templates and proportional, Tribal sovereignty-aligned structures, the changes will support Tribal governments in reallocating resources from federal paperwork toward direct community care and protective services. These are statutory and regulatory examples that ACF is engaged in that support changes to improve Tribal governance and reduce unnecessary administrative burden.

We also recognize that federal regulations serve a critical purpose in improving policy and services to Native children and families, protecting their best interests, and promoting partnership between state and Tribal governments. An example of a regulation that promotes greater protection and support for improved Tribal-state relationships is the 2024 Foster Care Legal Representation

regulations. This final rule provides clarification on the use of Title IV-E administrative funds to support legal representation of the child welfare agency, children, and parents in foster care proceedings in either Tribal or state systems and for legal representation of a Tribal Nation in a state child welfare proceeding where a Tribal citizen (child) is involved. Studies have indicated the criticality of children and parents having legal representation in child welfare proceedings and the benefits of this representation in securing appropriate placements, better judicial decisions, safe return to parents, and reduced stays in foster care (Casey Family Programs, 2019). When Tribal Nations are afforded the opportunity to provide legal representation in state child custody proceedings, Tribal children, families, state child welfare agencies, and state courts benefit. For many Tribal Nations, their capacity to provide legal representation as parties in state proceedings involving their Tribal children is challenging, which also limits the benefits for the court to Tribal knowledge, perspective, and resources. This is especially true when Tribal Nations are intervening in state court proceedings as a legal party where the Indian Child Welfare Act applies. Working with states to claim Title IV-E reimbursement for legal counsel for Tribal Nations so they can be fully represented, and the court and other parties have the benefit of their knowledge and resources is critical. Providing reasonable opportunities to support the cost of legal representations for children, parents, and Tribal Nations can save dollars over the long-term with more effective decision-making.

Another example was the previous Administration for Native Americans (ANA) Social and Economic Development Strategies (SEDS) and SEDS Alaska programs, which were specifically designed as flexible, broad frameworks that allowed Tribal Nations to entirely define their own social and economic priorities. Despite concerns raised by Indian Country commenters about the proposed changes and the need to consult with Tribal Nations before proposing changes, ACF proceeded with their plan to eliminate SEDS/SEDS-AK and replace them with the new Economic Advancement Grants for Local Empowerment (EAGLE) program. While ACF argued in the final rule that a broad “IDEAS” category within EAGLE will preserve some local discretion, the structural shift inherently places tighter federal guardrails around how Tribes can use ANA funds to address Tribal economic priorities that are responsive to local needs and realities. Multiple commenters also raised flags regarding Tribal data sovereignty, Tribal readiness, and the costs of focusing these funds on AI initiatives. By funding an AI institute, the agency risks misallocating scarce resources away from the immediate, foundational social and economic needs defined by the Tribal Nations themselves. Commentors also pointed out that capping the National Center budget at \$3.1 million annually represented a 70% reduction in regional staffing capacity, endangering culturally responsive, local assistance. Aside from ANA agreeing to expand the EAGLE proposal to include other skilled trades (not just welding under the “Welders to Elders” program) and promises to address definitions inside NOFOs, the overarching structural shifts were implemented as originally planned. Without shared priorities between the agency and Tribal Nations, federal overhauls risk cutting off the local support and flexibility that Tribal Nations rely on to serve their communities effectively.

As ACF continues to consider and pursue deregulation, it is imperative that Tribal Nations are consulted in meaningful ways that occur pre-decision, provide ample notice of consultation opportunities (60 days minimum), and allow Tribal Nations to discuss and learn about proposed changes that ACF is contemplating prior to consultation.

PUBLIC LAW 102-477 MODERNIZATION

ACF has clearly articulated its goals to increase self-sufficiency, economic opportunity, job acquisition, and health outcomes for Native families. Every day, Tribal Nations put ACF program dollars to work in their communities to support the self-sufficiency, economic mobility, and health outcomes of their Tribal citizens and the economic development of their communities. As sovereign governments, Tribal Nations provide vital services to their Tribal citizens in a fiscally responsible and efficient way, and that best meets the unique needs of their communities. Reducing bureaucratic oversight, reporting obligations, and administrative requirements is essential to both efficient and cost-effective service delivery as well as Tribal sovereignty.

Public Law 102-477, commonly known as the 477 program, is a statutory authority that enhances both Tribes and ACF's ability to achieve these shared priorities. The 477 program has existed since 1992, and ACF was one of the first federal agencies to authorize programs for integration into Tribal 477 plans. In 2017, President Trump signed into law the Indian Employment, Training, and Related Services Consolidation Act, which expanded and made permanent the 477 program. Following a recommendation from ACF, the Bureau of Indian Affairs approved the first Title IV-B integration in a Tribal 477 plan in 2023. These have been important steps for supporting the sustainability and expansion of the 477 program, and we look forward to additional opportunities to expand shared 477 priorities.

We support opportunities to expand integration of ACF programs into 477 to promote Tribal sovereignty and reduce federal bureaucracy. We urge ACF to ensure that all 477 funds are transferred to Tribes in a timely manner so they can put them to work immediately in their communities and that clear, detailed communication occur between Tribal Nations and ACF on barriers to meeting this goal, both with individual Tribes that have submitted 477 proposals and with Indian Country at large. This communication is critical to Tribal Nations being able to accurately evaluate what ACF programs can be integrated successfully into 477 plans and the expectations of ACF in how Tribes should communicate program connections to the purposes of 477. Tribal Nations also need timely and targeted technical assistance to ensure they maintain eligibility for grants integrated into 477, and so that smaller Tribal Nations can also leverage a single, cohesive budget to address employment, training, and welfare needs holistically.

In addition to the establishment of a new ACF 477 team, outlining a clear integration process that details key components like agency coordination, data collection, reporting, timely feedback on the status of 477 plan changes, addressing non-compliance findings without shifting the burden to Tribes, and providing targeted technical assistance that recognizes and respects Tribal authority, could also help address barriers to Tribal integration of ACF programs into their 477 plans and actualizing the goals of 477—reducing administrative burdens, promoting Tribal self-determination, and improving service delivery.

OTHER TOPICS OF INTEREST

Artificial Intelligence in Child Welfare

Through Executive Order 14359 and other ACF initiatives, we recognize that integration of AI and predictive analytics in child welfare is a priority of the Administration. Amid ACF's efforts to rapidly adopt AI tools, we strongly urge ACF to consult with Tribal Nations about the implications of AI

adoption for Tribal data governance, jurisdictional authority, and ICWA implementation—including critical questions about how bias, transparency, privacy, and accountability in AI integration will be handled.

Embedding AI tools in child welfare systems means shifting how decisions are made regarding investigation, substantiation, placement, and services to Native children and families. Because of the complexity in which child welfare is governed for Native children and families (Tribal sovereign authority, shared jurisdiction, federal trust obligations, and ICWA compliance), it is necessary that ACF consult with Tribal Nations on how best to proceed with integration of AI tools in child welfare without exposing Native children and families to significant harm. Below are a few areas of immediate concern as it relates to AI tools and implications for Tribal Nations and Native families.

- **Data sovereignty**—AI tools or systems that process information about Native children and families raise questions about who owns and controls the data used to train the model, who is involved in developing the guidelines and training the model, and what secondary uses are allowed. Tribal Nations possess governmental interests in the ownership of Tribal data, stewardship of Tribal information, control over secondary uses, and culturally appropriate governance of Tribal information. Conversations about the use of AI tools in child welfare must incorporate principles of Tribal sovereignty, self-determination, trust responsibility, and Tribal data governance identified through Tribal consultation.
- **ICWA implementation**—AI tools used to shape early child welfare decisions could shape how agencies identify ICWA eligibility, document their determination, notify Tribe(s), and support early Tribal intervention. The design and implementation of AI tools must include potential implications for ICWA implementation when serving Native children and families.
- **Accountability and transparency**—With the potential for AI systems to shift how decisions are made in child welfare systems, transparency, auditability, and human responsibility for errors will be necessary to any AI system integration—including robust accountability processes for identifying and correcting errors produced by AI systems that shape critical screening, documentation, or placement practices.
- **Jurisdiction and administrative capacity**—Tribal child welfare systems are governed by complex jurisdictional dynamics and government-to-government obligations. If AI tools can't capture these important nuances, systems are liable to do harm. Tribal and state child welfare systems also vary in staffing, technical capacity, data system integration, and funding stability. AI tools that are designed for jurisdictions with more resources could force rural Tribal communities that don't have the same broadband access, vendor support, or legal capacity out of important conversations about and engagement in AI integration.
- **Replicating bias**—AI systems trained on caseworker reports, court records, and other administrative data will reproduce already-existing biases in state child welfare systems. Detailed explanations on how these biases will be addressed in training and evaluating AI systems and their outputs are necessary to protect Native children and families.

While we recognize that some AI tools may have benefits for child welfare systems, there are also serious concerns, especially related to the use of predicative analytics as discussed in the research literature and in documentation about the experiences of states that have already implemented some of these tools. The results from inappropriate AI use can disadvantage children and families of color, which includes Native children and families, in child welfare systems that

already show poor outcomes for this population. We urge ACF to take these concerns seriously and consult with Tribal Nations to explore how AI could be used with Native children in state child welfare systems.

Appropriate Consultation with Tribal Nations

Tribal consultation is an essential element of any proposed changes to federal agency policy that impact Native children and families. Both HHS and ACF have consultation policies established through executive action that reinforce and instruct agency officials on the process for conducting appropriate consultation. Meaningful consultation means in-person, interactive, pre-decisional, informational, and transparent discussion between ACF and Tribal Nations, prior to the development and finalization of any final rule with impacts to Tribal Nations. To ensure meaningful engagement, ACF must provide Tribal Nations with timely notice, complete information about the issue and potential actions the federal agency is considering, and technical assistance to discuss complex issues. Tribal Nations also need adequate time to prepare and deliver both in-person and written testimony, followed by transparent agency reports detailing how Tribal leader feedback shaped final decision-making.

We also recognize that deregulation and other ACF initiatives have already been initiated and are in the process of implementation before Tribal consultation was considered. Any future deregulation or policy changes with implications to Tribal sovereignty and Tribal program integrity should be subject to immediate formal Tribal notice and consultation to promote strong attendance and information sharing across Indian Country before decisions are made that impact Tribal Nations and Native families. We recommend the agency extend public comment periods to 60 or 90 days—30-day comment periods do not provide sufficient time for Tribal Nations to review notices, discuss impacts, and submit comments.

Conclusion

Tribal Nations are ready to work with ACF to support its initiatives that enhance Tribal program efficiency and effectiveness while advancing the principles of Tribal self-governance and upholding federal trust and treaty obligations. Consultation ahead of decisions to propose or make policy changes will be critical in ensuring that federal trust and treaty obligations are upheld, federal agencies are exposed to Tribal perspectives and experiences, and changes advance policy that supports effective Tribal administration of federal programs and retains important protections for Native children and families

We appreciate the opportunity to provide comments on these important issues and look forward to continued partnership in support of Tribal Nations and Native families.

Respectfully submitted,

National Indian Child Welfare Association

References

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