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INFORMATION MEMORANDUM

TO: State and Tribal Agencies Administering or Supervising the Administration of Title IV-E of the Social Security Act

SUBJECT: Use of Title IV-E Programmatic Options to Improve Support to Relative Caregivers and the Children in Their Care**.**

LEGAL AND RELATED REFERENCES: Titles IV-B and IV-E of the Social Security Act (the Act), Executive Order 13930, Strengthening the Child Welfare System for America's Children, issued June 24, 2020.

PURPOSE: In response to the Executive Order 13930, Strengthening the Child Welfare System for America's Children, this Information Memorandum (IM) encourages title IV-E agencies to make use of flexibilities and options within the title IV-E program to improve support for relatives and kin caring for children in foster care. These options include making use of waivers of non-safety related foster care licensing standards for relative foster care providers and participating in the title IV-E Guardianship Assistance Program (GAP).

This IM is organized as follows:

I. Background
II. Federal Requirements and Flexibilities for Relative/Kinship Care
III. Implementation of the Use of Waivers of Non-Safety Licensing Standards for Relative Foster Family Homes
IV. Strategies for Increasing Foster Parent Licensure among Relatives
V. Title IV-E Guardianship Assistance Program
VI. Benefits of Offering a Guardianship Assistance Program
VII. Title IV-E GAP Flexibilities
VIII. Post-Permanency Support for Legal Guardians
IX. Conclusion

I. BACKGROUND

When parents are unable to safely care for their own children, it is often grandparents, other relatives or kin, who step forward to provide a loving home for those children, either temporarily or permanently. The term "kinship care" encompasses a variety of situations in which children are raised by other family members, relative caregivers or close non-related caregivers when the child's parents are unable to care for the child. Nationally, about 2.7 million children are being raised in a kinship care family without a parent present.[1] Many of these kinship families are raising these children without the involvement of the child welfare system. Among children in foster care, almost one-third (over 133,000 children), lived in relative foster family homes as of the last day of federal fiscal year 2019.[2]

Findings from the National Survey of Child and Adolescent Well-Being (NSCAW), a nationally representative, longitudinal study intended to answer a range of questions about children involved with the child welfare system, indicate that children living with relatives experience fewer behavioral problems[3] and higher placement stability rates[4] compared to children living with nonrelatives in foster care. However, while kinship care offers potential benefits to children, kinship caregivers have characteristics and needs that differ from nonrelative foster parents. For example, NSCAW studies have found that kinship caregivers, compared with other foster caregivers, are older, have fewer years of education, are less likely to be currently married, and are more likely to be living below the federal poverty level.[5] Kinship caregivers were also less likely than foster caregivers to receive any form of parent training or to participate in peer support groups.[6] Children in kinship care also are more likely to have unmet needs. For instance, children with cognitive and academic needs placed in kinship care are less likely to receive needed early intervention or special education services than similar children placed in nonrelative foster care. Unmet early intervention and special education needs are particularly large among children who are living in voluntary kinship care (i.e., the child is living with kin, but no payments are received from the child welfare agency for the care of the child, and the caregiver does not have a license or certificate to provide foster care).[7] Therefore, it is important for child welfare agencies to consider

[1] US Census Bureau (2019). Current Population Survey Annual Social and Economic Supplement 1 year Estimates.
[2] Adoption and Foster Care Analysis and Reporting System (AFCARS) Report for FY 2019. https://www.acf.hhs.gov/sites/default/files/cb/afcarsreport27.pdf
[3] Rubin, D.M., Downes, K.J., O'Reilly, A., Mekonnen, R., Luan, X., and Localio, R. (2008). Impact of kinship care on behavioral well-being for children in out of home care. *Archives of Pediatrics and Adolescent Medicine.162. (6).*
[4] Rubin, D.M., O'Reilly, A., Hafner, L., Luan, X. and Localio, A. (2007) *Placement Stability and Early Behavioral Outcomes among Children in Out-of-Home Care*. Child Protection: Using Research to Improve Policy and Practice, ed. R. Haskins, F. Wulczyn, and M.B. Webb. 171-186.
[5] National Survey of Child and Adolescent Well-Being Research (NSCAW) Brief No. 15 (2012). Kinship Caregivers in the Child Welfare System. Retrieved at https://www.acf.hhs.gov/opre/resource/national-survey-of-child-and-adolescent-well-being-no-15-kinship-caregivers
[6] Sakai, C., Hua, L., Flores, G (2011). Health Outcomes and Family Services in Kinship Care Analysis of a National Sample of Children in the Child Welfare System. *Archives of Pediatrics and Adolescent Medicine.* 2011
[7] Casanueva, C., Smith, K., Ringeisen, H., Dolan, M., Testa, M. & Burfeind, C. (2020). NSCAW Child Well-Being Spotlight: Children Living in Kinship Care and Nonrelative Foster Care Are Unlikely to Receive Needed Early Intervention or Special Education Services. OPRE Report #2020-31, Washington, DC: Office of Planning, Research and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services. https://www.acf.hhs.gov/opre/resource/children-living-in-kinship-and-nonrelative-foster-care-unlikely-to-receive-needed-early-intervention-or-special-ed-services.

how they can best support kinship caregivers to ensure the well-being of both caregivers and the children in their care.

On June 24, 2020, President Trump issued Executive Order 13930, "Strengthening the Child Welfare System for America's Children." Among its provisions, the order directed the Secretary of Health and Human Services to enhance support for kinship care by establishing a plan to address barriers to accessing existing federal assistance and benefits for eligible individuals and to provide information to states regarding the importance and availability of funds to increase participation in the Title IV-E Guardianship Assistance Program (GAP), which provides federal reimbursement for payments to guardians and for associated administrative costs. In response to these directives, this IM discusses strategies for promoting the licensure of relative foster homes and provides information on the number of title IV-E agencies that have already opted into the GAP program, and the benefits of participating in the program.

II. Federal Requirements and Flexibilities for Relative/Kinship Care

Federal law has a number of provisions that require identifying relatives and giving priority consideration to relatives as foster care placements for children in care. The law also provides agencies with flexibilities and options to better serve children in relative placements. For instance:

- Title IV-E agencies are required to consider giving preference to an adult relative over a non-related caregiver when determining a placement for a child, provided that the relative caregiver meets all relevant state child protection standards (section 471(a)(19) of the Act).
- Title IV-E agencies are required to establish licensing standards for foster family homes, but may waive any non-safety related standards for relative foster homes for specific children in care on a case-by-case basis (section 471(a)(10)(D) of the Act).
- Title IV-E agencies are required (subject to exceptions due to family or domestic violence) to have a mechanism in place to exercise due diligence to identify and notify all adult relatives, and all parents of the child's siblings that have custody of the sibling of a child's removal from his parents within 30 days of that removal. The notice must specify the relative's options to participate in the care and placement of the child (pursuant to Federal, State and local law), any options that may be lost by not responding to the notice, the agency's requirements for becoming a foster family home and the additional services and supports for children in foster family homes. If the title IV-E agency has elected to operate a title IV-E guardianship assistance program, the notice also must describe how a relative guardian may receive such assistance on the child's behalf (section 471(a)(29) of the Act).
- Title IV-E agencies have the option to participate in GAP, a program that provides guardianship assistance payments for the care of children by relatives who have assumed legal guardianship of eligible children for whom they previously cared as foster parents (sections 471(a)(28) and 473(d) of the Act).

While many states have taken advantage of the flexibilities to support relative and kin placements by having provisions to waive non-safety licensing standards for relative foster homes and by opting into title IV-E GAP, not all states have chosen to do so. Encouraging and

assisting relative foster care providers to become licensed placements is important, since it allows families to receive greater financial support through foster care maintenance payments. As discussed later in this IM, being licensed as a foster home is also one factor determining eligibility for IV-E GAP.

III. Implementation of the Use of Waivers of Non-Safety Licensing Standards for Relative Foster Family Homes

The Family First Prevention Services Act, enacted as part of P.L. 115-123, added a provision at section 471(a)(36) that required each title IV-E agency to submit information to CB on whether it has elected to waive non-safety licensing standards for relative foster homes (as allowed by section 471(a)(10)(D) of the Act), and a description of which standards it most commonly waives. The provision also required agencies to report to CB on how caseworkers are trained to use the waiver authority and whether the agency has developed a process or provided tools to assist caseworkers in waiving these non-safety standards to quickly place children with relatives.

CB has compiled the information submitted by all state and tribal title IV-E agencies (see Attachment A). Forty-two (42) states, the District of Columbia, Puerto Rico and the Virgin Islands and 3 tribes reported currently using waivers for non-safety licensing standards for relative foster family homes. Examples of standards commonly waived included:

Standards related to the home:

- Physical dimensions of home, room size requirements, the size and location of bedrooms, and related requirements (e.g., space in a closet, locker, or dresser for a child's clothing and personal belongings located in his sleeping area)
- Home environment requirements (e.g., requirements relating to the size and location of windows or to the location and number of exits from the home)
- Household matters including well testing (i.e., allowing for another source of potable water)
- Proximity of the relative foster care provider's home to the child's parents, for purposes of visitation

Standards related to the caregiver:

- Financial conditions/income standards of the kinship caregiver
- Pre-service or training standards
- Maximum number of persons who can care for a child
- Age of the caregiver
- Marital status of the caregiver
- Caregiver reference letters

Standards related to the children in the home:

- Number of children placed in the kinship home (e.g., allowing for placement of large sibling groups)
- Ages of children placed in the kinship home
- Sleeping arrangements of the children
- Flexibility relating to home schooling

In reporting on processes and tools to assist caseworkers in waiving these non-safety standards to quickly place children with relatives, some states reported using a template to assess and document the issue and basis for waiver approval. Many states have a specific waiver application form. In a few states, waiver requests are submitted through the state's information system as part of the foster care home study process and then reviewed by the foster care licensing policy staff.

States have trained their staff in various ways on the use of non-safety licensing standard waivers. Many states train caseworkers on the waiver process during new worker orientation, and by receiving ongoing training from their supervisors. For example, one state conducted statewide "train the trainer" sessions for licensing and case management agencies on the licensing standards and waiver process. Some states offer annual training on licensing rules and how to waive provisions for relatives. Some states make training materials and tip sheets available in hard copy and posted on the training web page for future reference or printing. In a few states, caseworkers who work with kinship caregivers meet monthly to discuss rules and policy updates.

IV. Strategies for Increasing Foster Parent Licensure among Relatives

The ability to waive non-safety related licensing requirements is just one tool to enable relatives to become licensed foster parents; states have implemented various strategies for increasing the number of relatives who become licensed foster parents. For instance, relative caregivers often cite foster parent licensing classes as a barrier due to the lengthy time commitment. Some states have redesigned their foster parent licensing classes to be more responsive to the needs of relative caregivers.

- Foster Kinship in Nevada[8] offers a 15-hour condensed version of a foster parent licensing training, "Caring for our Own," over a five-week period. Kinship licensing application sessions and child care is made available to relative caregivers.

- Tennessee[9] offers a 16-hour condensed version of the trauma-informed training, "Parents as Tender Healers," that is available to kinship parents over a two-week period. Some title IV-E agencies also issue temporary foster parent licenses to relative caregivers to

[8] Foster Kinship Child Welfare Training. https://www.fosterkinship.org/child-welfare-training/

[9] Tennessee Child and Service Plan 2020-2025, "Foster Parent Training" https://www.tn.gov/content/dam/tn/dcs/documents/quality_improvement/cfsr/TN_Child_Family_Service_Plan%202020-2024.pdf

expedite placement. In the District of Columbia,[10] relative caregivers who meet all of the requirements can receive an emergency temporary license within 48 hours of a waiver of non-safety licensing standards. Child welfare agencies provide comprehensive supports to kinship families to ensure that they can meet foster parent licensing requirements as timely as possible.

- A Second Chance[11] in Pennsylvania utilizes a kinship-specific training curriculum titled "Standards for Assessing and Recognizing Kinship Strengths," and visits kinship families twice monthly to ensure that licensure[12] is finalized within 60 days.

To learn more about state laws relating to the placement of children in relative foster homes, including provisions relating to licensing, please see the Child Welfare Information Gateway publication: *Placement of Children with Relatives*. [13]

V. Title IV-E Guardianship Assistance Program

In recent years, guardianship has emerged as a beneficial permanency option for some children and youth in foster care, as it creates a legal relationship between a child and caregiver that is intended to be permanent and self-sustaining and can provide a permanent family for the child without the necessity of terminating the parents' parental rights. The child is able to maintain family connections while gaining the stability of a permanent home with a relative caregiver who has demonstrated a commitment to caring for the child.[14]

The Fostering Connections to Success and Increasing Adoptions Act of 2008 (Public Law 110-351) established the title IV-E Guardianship Assistance Program (GAP) as an optional program for title IV-E agencies operating the foster care and adoption assistance programs. GAP is an entitlement grant program that helps states and tribes who opt to provide guardianship assistance payments for the care of children by relatives who have assumed legal guardianship of eligible children for whom they previously cared as foster parents. As of November 2020, 38 States, the District of Columbia, Puerto Rico, the Virgin Islands and 10 Tribes operating the title IV-E program have approved Title IV-E plan amendments that enable them to make claims for federal support of eligible guardianship assistance (See Attachment A). For those states and tribes that opt to participate in the program, federal assistance may be used only to support the care of

[10] Washington DC Child and Family Service agency Policy: "Temporary Licensing of Kin" https://cfsa.dc.gov/sites/default/files/dc/sites/cfsa/publication/attachments/Program%20-%20Temporary%20Licensing%20of%20Foster%20Homes%20for%20Kin%20%28final%29%28H%29_2.pdf

[11] A Second Chance. Kinship Care Curriculum and Certification. https://www.asecondchance-kinship.com/?s=%28Standards+for+Assessing+and+Recognizing+Kinship+Strength

[12] Pennsylvania Code § 3700.70. Temporary and provisional approvals of foster families. Temporary approval of a foster family may be authorized for a maximum of 60 calendar days. http://pacodeandbulletin.gov/Display/pacode?file=/secure/pacode/data/055/chapter3700/s3700.70.html&d=reduce

[13] Child Welfare Information Gateway. (2018). Placement of children with relatives. https://www.childwelfare.gov/topics/systemwide/laws-policies/statutes/placement/

[14] Child Welfare Information Gateway (2019). Kinship Guardianship as a Permanency Option. Washington, DC: U.S. Department of Health and Human Services, Children's Bureau.

children discharged from foster care to legal guardianship who meet the eligibility requirements specified in the statute.

In general, beneficiaries are children who have been eligible for title IV-E Foster Care maintenance payments during at least a six consecutive month period during which the child resided in the home of the prospective relative guardian who was licensed or approved as meeting the licensure requirements as a foster family home. In addition, the state or tribal agency must determine 1) that return home or adoption are not appropriate permanency options for the child; 2) the child demonstrates a strong attachment to the prospective relative guardian; 3) the relative guardian has a strong commitment to caring permanently for the child; and 4) for children who have attained the age of 14, the child has been consulted regarding the kinship guardianship arrangement. GAP beneficiaries may also be siblings of eligible children placed in the same kinship guardianship arrangement. Federal assistance is available to states and tribes for payments made to a relative guardian in accordance with a kinship guardianship agreement that is in writing, negotiated and is binding.

Although many states are approved to operate a GAP program, not all approved states appear to be making full use of the program to serve eligible families. Based on financial reporting data, the average monthly number of children receiving title IV-E guardianship assistance payments nationally was about 35,000 in FY 2019, but some agencies approved to operate the program reported serving few children. CB encourages all states to review their policies and practices to ensure effective operation of the program, thereby providing better support to kinship caregivers.

Issues in foster care licensing may be one factor affecting participation in the program. By increasing the number of relative foster homes that are licensed, states may also expand the population of families who may be eligible for title IV-E GAP, thereby enabling them to offer a permanent home for children unable to be reunified with parents.

VI. Benefits of Offering a Guardianship Assistance Program

Prior to implementation of the Title IV-E GAP, several states implemented similar programs through waiver demonstrations under the authority of section 1130 of the Act. Through the demonstrations, states used title IV-E funds to pay subsidies to caregivers who assumed physical and legal custody of children in their care. The demonstrations explored the extent to which the availability of guardianship assistance (also called "subsidized guardianship") provided a cost-effective permanency alternative that increased exits from foster care among children for whom adoption or reunification were not viable permanency options. All waiver demonstrations were required to include a rigorous evaluation conducted by an independent evaluator. These evaluations provided important information about the benefits of offering assisted or subsidized guardianship as one path to permanency for children in foster care and helped lay the foundation for creation of the IV-E GAP.

A synthesis of findings of subsidized guardianship waivers[15] reported key outcome findings including:

- Permanency Rates: Several States—including Illinois, Minnesota, Tennessee, and Wisconsin— demonstrated significant boosts in net permanency rates ranging from 7 percent in Illinois to 18 percent in Wisconsin for children randomly assigned to an experimental group who were eligible to receive guardianship subsidies over those assigned to a control group that did not have access to subsidized guardianship as a permanency option.

- Placement Duration: Evidence from Illinois, Minnesota, Oregon, Tennessee, and Wisconsin suggests that the availability of subsidized guardianship decreased length of time in out-of-home placement, with reductions ranging from 269 days during Illinois's original subsidized guardianship demonstration to 80 days in Tennessee.

- Maltreatment Recurrence: Findings from Illinois, Iowa, Minnesota, Oregon, and Wisconsin suggest that children placed with guardians are at least as safe as or safer from repeat maltreatment than children in other permanent settings.

- Child Well-Being: Findings from Illinois, Minnesota, Montana, Oregon, and Wisconsin suggest that children in subsidized guardianship arrangements fared as well or better than children in foster care or other permanent settings with respect to factors such as school performance and engagement in risky behaviors.

VII. Title IV-E GAP Flexibilities

Title IV-E agencies opting into title IV-E GAP have some discretion in how they design the program and the population of children and youth who may be served through the program. Title IV-E agencies may also set eligibility parameters relating to the age of the child. For instance, some agencies have chosen to target the program to older children and youth in care, while others allow participation by children of any age. Title IV-E agencies also have flexibility in how broadly they define "relative" for purposes of determining who may serve as a legal guardian under the program.

CB encourages title IV-E agencies to define the term "relative" broadly to include Tribal kin, extended family and friends, or other 'fictive kin.' Through previous guidance,[16] CB also recommended that title IV-E agencies use a consistent definition of relative for GAP and the relative notification provision at section 471(a)(29) of the Act, to the greatest extent possible. This supports the identification and notification of potential relatives and/or other kin, as applicable, who will be informed of their options to care for the child and, if appropriate, receive title IV-E kinship guardianship assistance on the child's behalf.

[15] Health and Human Services (2011) Synthesis of findings: Subsidized guardianship child welfare waiver demonstrations. Washington DC. Author. https://www.acf.hhs.gov/cb/resource/subsidized-2011
[16] See Program Instruction ACYF-CB-PI-10-11.

Many title IV-E agencies utilize a broad definition of the term "relative." For example,

- Oregon's definition of relative[17] includes: An individual meeting the requirements of at least one of the following - An individual not related to the child, young adult, or parent by blood, adoption, or marriage: (i) Who is identified as a member of the family by the child or young adult or by the family of the child or young adult; and (ii) Who had an emotionally significant relationship with the child or young adult or the family of the child or young adult prior to the most recent episode of Department custody.

- Arkansas' definition of relative and fictive kin[18] has been expanded as follows: "Fictive kin" means a person selected by the Division of Children and Family Services who: (A) Is not related to a child by blood or marriage; and (B) Has a strong, positive, and emotional tie or role in the: (i) Child's life; or (ii) Child's parent's life if the child is an infant; and (2) "Relative" means a person within the fifth degree of kinship by virtue of blood or adoption.

- Montana[19] defines both kinship and nonkinship guardians:
  A 'kinship guardian' is:
  - A member of the child's extended family
  - A member of the child's or family's Tribe
  - The child's godparents
  - The child's stepparents
  - A person to whom the child, child's parents, and family ascribe a family relationship and with whom the child has had a significant emotional tie that existed prior to the agency's involvement with the child or family; also known as 'fictive kin'.

  Documentation demonstrating that the prospective guardian meets the 'fictive kin' definition must be maintained in the child's case file. Documentation may include, but is not limited to, the child's and/or birth parent(s)' statement ascribing a family relationship and significant emotional tie that existed prior to the agency's involvement. A 'nonkinship guardian' is a person to whom the child or child's family did not have a significant emotional tie that existed prior to the agency's involvement with the child or family (i.e. foster parent).

[17] Oregon Administrative Rules, OAR chapter 413, division 70, 413-070-000. https://oregon.public.law/rules/oar_413-070-0000
[18] Arkansas Code Title 9. Family Law § 9-28-108. Placement of juveniles. https://codes.findlaw.com/ar/title-9-family-law/ar-code-sect-9-28-108.html
[19] Montana. Citation: Policy Manual § 407-4. https://www.childwelfare.gov/pubPDFs/kinshipguardianship.pdf

VIII. Post-Permanency Support for Legal Guardians

Relative legal guardians and the children in their care may need continued support after a guardianship is completed. While not a component of the IV-E GAP itself, most title IV-E agencies provide post-guardianship support services to kinship families. For example:

- Tennessee[20] provides statewide Guardianship Support and Preservation services to relative caregivers who become legal guardians. Guardianship Support and Preservation services include crisis intervention, in-home therapeutic counseling, monthly parent/guardian support groups, respite team building, adoption and guardianship preparation training, family and day camps, animal-assisted therapy, and other educational and advocacy opportunities for families.

- Wisconsin[21] is implementing a program called the "Adoption and Post Permanency Support Program (WiAPS) to provide particularized services and supports to adoptive, guardianship and birth families, and adult adoptees. WiAPS provides families with referrals to community services including day care, legal help, family counseling and support groups, and access to medical assistance providers.

To learn more about post guardianship support service resources, please see the Quality Improvement Center for Adoption and Guardianship Support and Preservation (QIC-AG).[22].

VIII. Conclusion

Research is clear that children who live with relatives and extended family members experience more positive well-being outcomes than children in foster care placed with non-kin foster parents. CB strongly encourages child welfare agencies to better support relatives by providing them with consistent information on their options to become licensed as foster parents and a legal guardian for the child. CB encourages all states to review their policies and practices to better support kinship caregivers, including by promoting licensure of relative foster homes and by making title IV-E GAP benefits available to a broad population of children and relatives. The Title IV-E GAP program is an important pathway to ensure that children can safely exit foster care, maintain their familial and cultural ties and develop healthy behaviors by living permanently with relatives.

[20] Tennessee Annual Progress and Service Report Fiscal Year 2021.
[21] Wisconsin Adoption and Post Permanency Support Program https://dcf.wisconsin.gov/adoption/resources
[22] Quality Improvement Center for Adoption and Guardianship Support and Preservation https://www.qic-ag.org

Through ongoing joint planning, CB will continue to facilitate discussions with title IV-E agencies to explore their use of programs and flexibilities to support kinship caregivers.

Disclaimer: *IMs provide information or recommendations to States, Tribes, grantees, and others on a variety of child welfare issues. IMs do not establish requirements or supersede existing laws or official guidance.*

Inquiries: Children's Bureau Regional Program Managers

/s/

Elizabeth Darling
Commissioner
Administration on Children, Youth and Families

Attachment:

Attachment A: Title IV-E Agencies Using Waivers for Non-Safety Licensing Standards for Relative Foster Family Homes and Approved to Operate Title IV-E Guardianship Assistance Program

Attachment A

Title IV-E Agencies Using Waivers for Non-Safety Licensing Standards for Relative Foster Family Homes and Approved to Operate Title IV-E Guardianship Assistance Program

Title IV-E Agency	Agency has elected to waive non-safety related licensing standards for relative foster family homes pursuant to waiver authority provided by 471 (a)(10)(D) of the Act	Agency is Approved to Operate Title IV-E GAP
States/Territories		
Alabama	No	Yes
Alaska	Yes	Yes
Arizona	Yes	No
Arkansas	Yes	Yes
California	No	Yes
Colorado	Yes	Yes
Connecticut	Yes	Yes
Delaware	No	No
District of Columbia	Yes	Yes
Florida	Yes	Yes
Georgia	Yes	No
Hawaii	Yes	Yes
Idaho	Yes	Yes
Illinois	Yes	Yes
Indiana	Yes	Yes
Iowa	Yes	Yes
Kansas	Yes	Yes
Kentucky	Yes	No
Louisiana	Yes	Yes
Maine	No	Yes
Maryland	No	Yes
Massachusetts	Yes	Yes
Michigan	Yes	Yes
Minnesota	Yes	Yes
Mississippi	Yes	No
Missouri	Yes	Yes
Montana	Yes	Yes
Nebraska	Yes	Yes
Nevada	Yes	Yes
New Hampshire	No	No
New Jersey	Yes	Yes

Attachment A

Title IV-E Agencies Using Waivers for Non-Safety Licensing Standards for Relative Foster Family Homes and Approved to Operate Title IV-E Guardianship Assistance Program

Title IV-E Agency	Agency has elected to waive non-safety related licensing standards for relative foster family homes pursuant to waiver authority provided by 471 (a)(10)(D) of the Act	Agency is Approved to Operate Title IV-E GAP
New Mexico	No	Yes
New York	Yes	Yes
North Carolina	Yes	Yes
North Dakota	Yes	No
Ohio	Yes	No
Oklahoma	Yes	Yes
Oregon	No	Yes
Pennsylvania	Yes	Yes
Puerto Rico	Yes	Yes
Rhode Island	Yes	Yes
South Carolina	Yes	No
South Dakota	Yes	Yes
Tennessee	Yes	Yes
Texas	Yes	Yes
U.S. Virgin Islands	Yes	Yes
Utah	Yes	No
Vermont	Yes	Yes
Virginia	Yes	Yes
Washington	Yes	Yes
West Virginia	Yes	Yes
Wisconsin	Yes	Yes
Wyoming	Yes	No
Tribes Operating Title IV-E		
Aleut Community of St. Paul Island (Alaska)	No	Yes
The Cherokee Nation (Oklahoma)	Yes	Yes
Eastern Band of Cherokee Indians (North Carolina)	Yes	Yes
Keweenaw Bay Indian Community (Michigan)	Information Not Yet Available*	Yes
Mashpee Wampanoag Tribe (Massachusetts)	Yes	Yes
Navajo Nation (Arizona)	Information Not Yet Available*	Yes
Pascua Yaqui Tribe (Arizona)	Information Not Yet Available*	Yes

Attachment A

Title IV-E Agencies Using Waivers for Non-Safety Licensing Standards for Relative Foster Family Homes and Approved to Operate Title IV-E Guardianship Assistance Program

Title IV-E Agency	Agency has elected to waive non-safety related licensing standards for relative foster family homes pursuant to waiver authority provided by 471 (a)(10)(D) of the Act	Agency is Approved to Operate Title IV-E GAP
Penobscot Nation (Maine)	No	Yes
Port Gamble S'Klallam Tribe (Washington)	Information Not Yet Available*	Yes
Salt River Pima Maricopa Indian Community (Arizona)	Information Not Yet Available*	No
Tolowa Dee-ni' Nation of Smith River (California)	Information Not Yet Available*	Yes

* Tribe exercised a statutory option available to tribal title IV-E agencies to delay implementation of section 471(a)(36) requiring each title IV-E agency to submit information on whether it has elected to waive non-safety licensing standards for relative foster homes (as allowed by section 471(a)(10)(D) of the Act).