Administration for Children and Families
Office of Child Support Enforcement
Tribal Consultation Session Summary Report
January 15, 2026

This report is written in accordance with the Administration for Children and Families (ACF) Tribal Consultation Policy, which requires a written report within 45 days after the written comment period closes. The Office of Child Support Enforcement (OCSE) Tribal Consultation session occurred January 15, 2026, and the official record was kept open until February 14, 2026. This report will summarize the discussion, identify specific tribal recommendations and requests, and provide a federal response. The OCSE Tribal Consultation Report is published on the OCSE Tribal Agencies website.

NOTIFICATION OF CONSULTATION

ACF announced the date, purpose, virtual location, and registration process for the consultation via a Dear Tribal Leader Letter (DTLL) on December 15, 2025. The DTLL was shared through the OCSE website and email listservs.

OCSE developed a final agenda based on an anticipated OCSE Notice of Proposed Rulemaking (NPRM) to rescind the Employment and Training Services for Noncustodial Parents in the Child Support Program final rule.

OCSE – Federal Representatives:
Linda Boyer, Deputy Commissioner, ACF, OCSE
Charity Casey, Regional Program Manager (Regions 1, 2, and 4), Division of Regional Operations, ACF, OCSE
Roberta Coons, Regional Program Specialist (Regions 5, 6, and 7), Division of Regional Operations, ACF, OCSE
Tinishia Cummings, Regional Program Specialist (Regions 5, 6, and 7), Division of Regional Operations, ACF, OCSE
Kimberly Curtis, Director, Division of Policy and Training, ACF, OCSE
Arlene Danzy, Program Specialist (Tribal), Division of Regional Operations, ACF, OCSE
Artish Fountain, Regional Program Specialist (Regions 5, 6, and 7), Division of Regional Operations, ACF, OCSE
Michael Ginns, Director, Division of Program Innovation, ACF, OCSE
Tracy Graham, Regional Program Manager (Regions 3, 8, 9, and 10), Division of Regional Operations, ACF, OCSE
Chartis Hayes, Program Specialist (Regions 3, 8, 9, and 10), Division of Regional Operations, ACF, OCSE

Michael Hayes, Program Specialist, Division of Program Innovation, ACF, OCSE
Dana Huckabee, Regional Program Manager (Regions 5, 6, and 7), Division of Regional Operations, ACF, OCSE
Channa Jennings, Regional Program Specialist (Regions 3, 8, 9, and 10), Division of Regional Operations, ACF, OCSE
Demetricus Johnson, Regional Program Specialist (Regions 1, 2, and 4), Division of Regional Operations, ACF, OCSE
Tanya Johnson, Customer Service Branch Manager, Division of Customer Communications, ACF, OCSE
Tristan Johnson, Program Specialist, Division of Regional Operations, ACF, OCSE
Rebecca Kantsiper, Program Specialist, Division of Regional Operations, ACF, OCSE
Janice McDaniel, Senior Program Specialist, Division of Policy and Training, ACF, OCSE
Tavaughn McKenny, Program Specialist, Division of Policy and Training, ACF, OCSE
Melody Morales, Social Scientist, Division of Program Innovation, ACF, OCSE
James Murray, Senior Advisor, Office of the Commissioner/Deputy Commissioner, ACF, OCSE
Arthur Pashi, Social Science Statistician, Division of Federal Systems, ACF, OCSE
Crystal Peeler, Director, Division of Customer Communications, ACF, OCSE
Cheryl Reid-Drayton, Regional Program Specialist (Regions 1, 2, and 4), Division of Regional Operations, ACF, OCSE
Lisa Ridenour, Senior Program Specialist, Division of Policy and Training, ACF, OCSE
Kimberly Smith, Senior Technical Advisor, Division of Policy and Training, ACF, OCSE
Jeffrey Stocks, Regional Program Specialist (Regions 5, 6, and 7), Division of Regional Operations, ACF, OCSE
Darryl Watts, Program Specialist, Division of Policy and Training, ACF, OCSE

Tribal Leaders, Designees, and Participants:
Janessa Bacon, Child Support Program Manager, Bear River Band of the Rohnerville Rancheria
Josefina Frank, Chairwoman, Bear River Band of the Rohnerville Rancheria
Brent Mulvaney, Family Services Attorney, Central Council of Tlingit and Haida Indian Tribes of Alaska
Barbara Laman, Child Support Unit Manager, Central Council of Tlingit and Haida Indian Tribes of Alaska
Shella Bowlin, Secretary of State, Cherokee Nation
Weston Cox, Government Relations, Cherokee Nation
Kirsti Holland, Government Relations Manager, Cherokee Nation
Sara Quetone, Child Support Director, Cherokee Nation
Maxwell Remy, Government Relations, Cherokee Nation
Joshua Drywater, Child Support Program Manager, Cherokee Nation
Shawn Holland, Child Support Director, Chickasaw Nation

Brittany Swan, Child Support Director, Chippewa Cree Tribe
Misty Bearden, Director, Choctaw Nation of Oklahoma
Bernadene Charley, Child Support Director, Confederated Tribes of the Colville Reservation
Hank Conko-Camel, Child Support Program Manager, Confederated Tribes of the Salish and Kootenai
Pamela Wiggins, Family and Children Services Director, Delaware Tribe of Indians
Sandy Cloer, Child Support Division Director, Eastern Band of Cherokee Indians
Rita Phillips, Child Support Director, Eastern Shoshone Tribes
Randall Werk, Sr, President, Fort Belknap Tribe
Willowa "Sis" Horn, Child Support Director, Fort Belknap Tribe
Sheryl Goodreau, Child Support Director, Keweenaw Bay Indian Community
Danita Herrera, Child Support Director, The Klamath Tribes
Blanche Hescock, Case Manager, The Klamath Tribes
Margaret Wilford, Program Manager, The Klamath Tribes
Michelle Beaudin, Secretary/Treasurer (Elected Tribal Official), Lac Courte Oreilles Nation
Tish Keahna Kruzan, Attorney, Lac Courte Oreilles Nation
Lori McFaggan, Child Support Educator, Lac Courte Oreilles Nation
Susan Smith, Child Support Director, Lac Courte Oreilles Nation
Sue Robinson, Child Support Program Director, Leech Lake Band of Ojibwe
Jennifer Paterson, Tribal Family and Youth Specialist, McGrath Native Village Council
LaRiah OKimosh, Child Support Program Director, Menominee Tribe
Kateri Cervantes, Child Support Director, Mescalero Apache Tribe
Nelva Cervantes, General Counsel, Mescalero Apache Tribe
Sally Latimer, Tribal ICWA Representative, Monacan Nation
Blair Shackelton, Child Support Assistant Director, Muscogee Creek Nation
Sage Wilson, Court Clerk, Native Village of Kluti-Kaah
Carmen Tageant, Child Support Director, Nooksack Indian Tribe
Angela Crazy Thunder, Child Support Director, Northern Arapaho
Trina Schuyler, Child Support Director, Oneida Nation
Michael Kidder, Child Support Director, Osage Nation
Maria Huynh, Children and Families Assistant Director and Interim Child Support Program Manager, Port Gamble S'Klallam Tribe
Angela Sullivan, Child Support Program Manager, Port Gamble S'Klallam Tribe
Vera Lucio, Child Support Coordinator, Pueblo of Zuni
Michelle Chareete-Goodwin, Child Support Director, Red Cliff Band of Lake Superior Chippewas
April Lauzon, Child Support Director, Saint Regis Mohawk Tribe
Carrie Terby, Child Support Director, Seminole Nation of Oklahoma
Lynette Dixey, Child Support Program Manager, Shoshone-Bannock Tribes
Donna Thompson, Chairperson, Shoshone-Bannock Tribes

Faith Reese, Child Support Program Manager, The Suquamish Tribe
Lindsay Lennox, Reservation Attorney, Tulalip Tribes of Washington
Roseann Reeves, Child Support Program Manager, Tulalip Tribes of Washington
Raegan Hendrickson, Child Support Program Manager, White Earth Nation
Jennifer Burgess, Child Support Program Manager, Yurok Tribe

Federal Representatives - Other:
Courtenay O'Connor, Tribal Program Specialist, ACF

OCSE Representatives – Contractors:
Michele Bell, Project Management Office Manager, OCSE
Nancy Crawford, Data Access Attorney, OCSE
Amy Gober, Data Access Attorney, OCSE

Written Testimonies:
Janessa Bacon, Child Support Program Manager, Bear River Band of the Rohnerville Rancheria
Megan Siaosi, Tribal Court Director, Bear River Band of the Rohnerville Rancheria
Richard J. Peterson, President, Central Council of the Tlingit & Haida Indian Tribes of Alaska
Chuck Hoskin, Jr., Principal Chief, Cherokee Nation
Wayland K. Large, Chairman, Eastern Shoshone Tribe
Willowa "Sis" Horn, Child Support Enforcement Program Director, Fort Belknap Indian Community
Gary Clause, Chairman, Lac Courte Oreilles Band of Lake Superior Chippewa Indians
Anthony Hillaire, Chairman, Lummi Indian Business Council
Chief Robert Burkybite, Chief, Modoc Nation
William E. Woods, Jr., President, National Tribal Child Support Association
Shannon F. Wheeler, Chairman, Nez Perce
Keenan Groesbeck, Chairman, Northern Arapaho Business Council
Tehassi tasi Hill, Chairman, Oneida Nation
Amber Caldera, Chairwoman, Port Gamble S'Klallam Tribe
J Garrett Renville, Tribal Chairman, Sisseton-Wahpeton Oyate
Steven Sitting Bear, Tribe Chairman, Standing Rock Sioux Tribe
Michael Fairbanks, Chairman, White Earth Reservation Business Committee

Greetings and Introductions

Deputy Commissioner Linda Boyer with the Office of Child Support Enforcement welcomed attendees and expressed the importance of this consultation. Arlene Danzy, Tribal Program Specialist in OCSE's Division of Regional Operations, explained how virtual attendees could provide testimony.

EMPLOYMENT AND TRAINING SERVICES FOR NONCUSTODIAL PARENTS IN THE CHILD SUPPORT PROGRAM

OCSE appreciates the written and verbal testimony provided by Tribal IV-D programs and tribal leaders regarding proposed rescission of the 2024 Employment and Training Services for Noncustodial Parents in the Child Support Program final rule. Tribal commenters emphasized that employment and training (E&T) services, when delivered through the child support program, can help address persistent employment barriers faced by many noncustodial parents (NCPs) in tribal communities, including limited job availability in rural and remote areas, transportation challenges, seasonal or intermittent work, and broader economic conditions that destabilize income. Tribal commenters also explained that, in many communities, workforce programs may be fragmented, underfunded, or difficult to access, and child support may function as a primary point of engagement for parents who are not otherwise connected to workforce systems. Tribal commenters further stated that providing E&T services through child support promotes consistent payment, reduces arrears, and shifts engagement with NCPs toward a more supportive approach that improves family stability.

In consultation testimony, tribal representatives reiterated that tribal child support programs operate under unique authorities and circumstances and that employment-focused approaches may be among the most effective ways to improve child support outcomes in some tribal communities, particularly where common enforcement tools may be unavailable or ineffective due to local realities (for example, where parents may not hold licenses, maintain bank accounts, or have attachable assets, and where tribal justice systems face capacity constraints). Tribal testimony also highlighted that barriers to employment in rural tribal communities can include lack of transportation, housing instability, limited training and education opportunities, and other challenges that make enforcement-only approaches less likely to succeed. Several tribal commenters further framed their testimony within the federal government's treaty obligations and trust responsibility, emphasizing that changes to federal child support policy must be implemented in a manner consistent with the government-to-government relationship and applicable federal Indian law.

Several consultation participants provided programmatic detail intended to demonstrate that child support–based E&T services can be designed to be coordinated and non-duplicative. For example, testimony described using formal agreements and intake practices to avoid duplicating services and to refer participants to specialized programs already in place. Consultation testimony also emphasized that, in reliance on the final rule and prior implementation pathways, some tribal programs invested substantial staff time and administrative resources in planning, grant development, and pilot design. Commenters

expressed concern that rescission at an early stage would disrupt these efforts and prevent meaningful evaluation of program effectiveness.

Some tribal representatives also referenced prior efforts to pursue Section 1115 waiver authority to implement employment-focused initiatives. They expressed concern that the proposed rescission creates uncertainty regarding the scope of permissible innovation within Title IV-D, potentially discouraging future tribal innovation and program development.

In addition, consultation participants offered specific examples of outcomes they viewed as evidence of effectiveness, including past pilot or grant efforts focused on reducing barriers to employment and supporting NCP engagement (for example, reported employment, education enrollment, and improved court experiences). Several tribes described culturally grounded and holistic service models that integrate employment services with parenting education, behavioral health supports, and traditional teachings. Commenters emphasized that these initiatives reflect community values and strengthen family relationships in addition to improving payment compliance.

Tribal commenters further emphasized that many tribal IV-D programs serve non-tribal NCPs whose participation directly supports the well-being of tribal children. Commenters expressed concern that rescission would limit tribal programs' ability to provide E&T services to these parents, potentially resulting in inequitable outcomes for tribal families based on the citizenship status of one parent. Multiple tribal commenters also characterized rescission as disproportionately harmful to tribal communities, citing rural infrastructure limitations, higher unemployment rates, and limited access to alternative workforce systems.

OCSE RESPONSE

OCSE recognizes the consistent theme across both written and verbal testimony that many tribal communities face geographic isolation and limited local capacity in employment systems, and that tribal IV-D programs may be positioned to engage NCPs in ways that other systems are not. We also acknowledge the emphasis in testimony on tribal sovereignty, treaty obligations, and the federal trust responsibility. Several tribes grounded their comments in longstanding constitutional, statutory, and treaty-based obligations. OCSE acknowledges that federal child support policy must be implemented in a manner consistent with the government-to-government relationship and applicable principles of federal Indian law.

OCSE further acknowledges the core point raised repeatedly in testimony: that improving employment and earnings capacity may be the most realistic and durable path to sustained child support compliance in some tribal communities, particularly where commonly used enforcement tools may be less available or less effective in practice. At the same time, as

OCSE explained during consultation, the final rule projected substantial federal expenditure costs over time, reaching $98.5 million per budget year by 2034. As such, OCSE has concluded that the policy approach reflected in the rule is not the most cost-effective or efficient means of advancing Title IV-D objectives. With respect to necessity and effectiveness, the approach has been deemed neither necessary nor effective because it sets up a separate service and funding system within child support agencies that overlaps with existing federal workforce programs, making administration more complicated and fragmented even when coordination is possible.

OCSE further acknowledges tribal concerns regarding the interaction between the proposed rescission and Section 1115 waiver authority, including questions about future flexibility and innovation within tribal IV-D programs. We recognize that some tribal programs undertook planning, coordination, and administrative preparation in anticipation of implementing services authorized under the final rule, and we will consider these practical impacts as part of our review.

OCSE also understands testimony that, in many rural and remote settings, existing workforce programs may not be meaningfully accessible to the NCP population served by tribal IV-D agencies, and that non-duplication can be addressed through coordination, referrals, and agreements. We further acknowledge testimony noting that many tribal IV-D programs serve non-tribal NCPs whose employment stability directly affects tribal children, as well as testimony describing culturally grounded and holistic service models that integrate employment services with broader family and community supports.

OCSE will take the information provided through verbal and written consultation testimony into account as we continue our review of the final rule and the proposed rescission, including the practical considerations raised regarding access, coordination, capacity, and potential impacts on tribal families and communities. We value the perspectives shared, will ensure they are documented in the administrative record, and remain committed to continued dialogue consistent with our federal trust responsibility and government-to-government relationship.

Detailed comments, verbal and written by topic:

Employment and Training Services for Noncustodial Parents in the Child Support Program.

Verbal testimony:

Michelle Bodine, Secretary/Treasurer, Lac Courte Oreilles:
Oh, so I want to read our testimony because we are submitting this in, in writing to you as well.

But the Lac Courte Oreilles tribal governing board supports the Lac Courte Oreilles Child Support program in the efforts of, of other tribes, states, and national organizations to provide education on the needs of employment services directly from child support agencies. Child support programs offer unique access to individuals to promote employment and training services in companion with parenting skills. The Lac Courte Oreilles tribal governing board, like the Administration for Children and Families, recognizes that an awareness of financial responsibility by parents is directly related to the increase in child support payments. How we increase awareness of financial responsibility is directly tied to an understanding of parenting roles.

October 1, 2025, the LCO tribal governing child support began the implementing, implementation of the Mino Bimaadiziwin Project pilot program. Our experiences have been when noncustodial parents come first, come in for an assessment, they are often hesitant, expecting more hoops to jump through and no help. By the time they leave, they feel hopeful and encouraged because they've discovered a place that honors who they are and where they come from. The reason is simple. We take a holistic approach rooted in traditional tribal values. Our program addresses the full spectrum of individual challenges such as substance use, alcohol dependency, mental health concerns, and reentry after incarceration. And I might add one more thing, historical trauma. When we look at those things, and, and the non-parenting skills that people have stems back from removal of our people from their families and their parents and not learning how to be nurturing and, and, and taking on those parenting skills from learning them from their parents.

So, I digressed a little bit from the letter. So, but while reconnecting participants to their identities and traditions, the Mino Bimaadiziwin Project program integrates the tribally relevant 7 Grandfather Teachings in every session, reminding parents of their sacred responsibilities to family and community. These teachings help restore balance and self-worth fostering healthy relationships with their co-parent, and strengthening families, connections to their traditional tribal values. This foundation of traditional teachings transforms the program from a service into a path of healing and empowerment, which teaches and inspires parents to prioritize their children's well-being and to recognize the need for consistent child support obligations. The 7

Grandfather Teachings creates a stronger, stronger family bonds, increased financial supports, and brighter futures for children by reconnecting parents to traditional values through responsible parenting and economic upward mobility. Success stories are important to help to understand importance of employment and training services for noncustodial parents in the child support program, such as the Mino Bimaadiziwin Project.

One account of a parent in the LCO child support Mino Bimaadiziwin Project program is as follows: A young parent was extremely anxious when he had upcoming child support court appearances. His previous court experiences usually ended with an arrest. He learned that through attending several Mino Bimaadiziwin Project sessions, how to prepare for court. He was encouraged to write down his accomplishments and goals, both within our program and in other supportive services, including his steps to provide for his children and respect for his co-parent. When he presented his accomplishments, the court recognized those and encouraged his efforts. Instead of being arrested, he left feeling proud and motivated. He accepted full responsibility for his past actions and is now actively working to correct them in a way that benefits his children and strengthens his role as a parent in his employment efforts.

Approximately 25% of referrals to our program originate from court recommendations. While 75% come from child support case workers, of those referrals, nearly 50% enroll in actively participate in our services. This demonstrates a critical role these programs play in engaging parents and supporting compliance with child support obligations. A noncustodial parent participating in the Mino Bimaadiziwin Program increases the likelihood of paying child support through the wage withholding and increases that effectiveness of the tribal child support program. The La Courte Oreilles tribal governing board recognizes the need for programs to provide well-coordinated, coordinated and non-duplicative training services. We ensure that our services for noncustodial parents are not duplicated. We use formal memorandums of understanding to refer participants to specialized services already in place, such as career development, substance use treatment, and mental health support.

During our initial assessment, we carefully review which programs each parents is currently engaged with to avoid duplication and ensure coordination with agencies. This approach allows us to focus on filling gaps rather than duplicate efforts, creating a streamlined and effective network of resources for parents. Lac Courte Oreilles Child Support program has taken into consideration other tribal agencies providing employment services such as TANF, workforce resource, vocational rehabilitation, and by developing policy and procedures to ensure that noncustodial parents are not receiving the same employment and training services from other federally funded employment and training programs.

The Lac Courte Oreilles tribe is federally recognized tribe located in northern Wisconsin and one of the 11 federally recognized tribes in Wisconsin. The La Courte Oreilles Child Support

Program has a comprehensive tribal IV-D child support program since 2013. In that time, we have realized that our agency has a unique access to address high unemployment of noncustodial parents, both through direct office contact as well as court action.

In closing, the La Courte Oreilles Band of Lake Superior Chippewa Indians support the retention of the final rule Employment and Training Services for Noncustodial Parents in the Child Support Program. Beguiled (native language), which means thank you for taking our comments under consideration.

Calvin Jilot, Business Committee, Chippewa Cree Tribe:
I'll too, I'll, I'll read off exactly what. First, I guess my name is Calvin Jilot. I'm the one of the tribal leaders for the Chippewa Cree Tribe. I'm also the chairman of the Child Support Office for the Chippewa Cree Tribe. So, I'll be reading our testimony to you guys right now, as we also will be sending this off to you. But again, our tribe appreciates the opportunity that is provided to be able to read this written testimony regarding the proposed recission of the Employment and Training Services for Noncustodial Parents in the Child Support Program final rule. Our tribe believes strongly in the proposed responsibility of the child support program. As the first tribal, tribal support program in Montana, we have a long history of supporting initiatives that strengthen service delivery, improve family stability, and prioritize the well-being of children. We have consistently welcomed efforts that allow tribal programs to move beyond enforcement alone and toward solutions that address the underlying barriers families face.

To start touching on just a few bullet points, our good faith participation in the 1115 waiver process. When the employment and training service services initiative was introduced, our program engaged in the process in good faith. We viewed the initiative as an important opportunity to enhance child support outcomes by supporting noncustodial parents and becoming employable, stable, and able to meet their obligations.

Our program worked towards the development of an 1115 waiver proposal in coordinated internally in preparation for submission. A significant staff time and planning were invested based on federal guidance encouraging tribal participation and innovation. Our program was prepared to submit when we were informed that the waiver pathway was being rescinded. The recission occurred after tribes had already, already begun planning and development efforts, leaving programs without the ability to move forward despite readiness and demonstrated needs.

Our, our tribal realities and service gaps, our tribal communities, you know, face unique and pursuant challenges that directly affect child support outcomes. These include geographic

isolation, limited employment opportunities, transportation barriers, and reduce access to training and accredited programs.

These realities are adequately addressed through enforcement-based approaches alone. Employment and training services are not duplicative existing programs. Rather, they fill a critical service gap for noncustodial parents who may not qualify for other assistant programs, yet still face significant barriers to employment. Without these services, child, child support programs are left with fewer tools, proactively for two practically supported families.

Our child support programs exist to serve children. In supporting noncustodial parents to obtaining employment and stability leads to more consistent child support payments, reduce arrears, and improve long term outcomes for families. Unemployment and training services address the root cause of noncompliant root causes of noncompliance rather than relying solely on who live enforcement measures which are which are often less effective and more costly. These services allow parents to meet the responsibilities in a meaningful way, ultimately benefiting children and strengthening families.

Our request to OCSS, you know, we're, we're respectfully urging that the Office of Child Support Services to reconsider the recission of the Employment and Training Services final rule. At a minimum, we're requesting to restore, restoration of a pathway, such as a waiver and alternative mechanism that allows child support service programs to implement employment and training services under the IV-D program. Tribal programs need flexibility to design solutions that affect the realities of their communities and to continue building programs that support parents, children's family, and families effectively.

In closing, our program welcomed the Employment and Training Services initiative and prepared to implement it responsibly. The removal of this option limits tribal innovation and reduces the tools available to improve child support outcomes. We urge OCSS to preserve or restore this important opportunity, so tribal support programs may continue to serve children through strategies that promote employment responsibility and family stability. Again, we really appreciate the time and opportunity you guys have given us to be able to provide this testimony.

Donna Thompson, Chairperson, Shoshone-Bannock Tribes
I am Donna Thompson, chairwoman of the Fort Hall Business Council of the Shoshone-Bannock Tribes. We are one of three Idaho tribes that are federally funded to operate a title IV-D child support service program and are appreciative of the working relationship with the we have with the Office of Child Support Services.

With over 6000 enrolled tribal members on our 550,000 acre reservation within Idaho, the United States has a trust responsibility to our tribe that is encompassed in the Fort Bridger Treaty of July 3, 1868. This treaty affirms the tribe's sovereignty and the federal obligation to support the health, welfare, and well-being of our people. Federal child support policy must be implemented in a manner consistent with these treaty obligations and the government-to-government relationship.

We are extremely disappointed in the proposed recission of the final rule for Employment and Training Services for Noncustodial Parents in the Child Support Program that would have allowed our tribes tribal child support program to apply for the 1115 waiver to fund employment and training services for noncustodial parents. This reduces our options to secure sufficient funding to help noncustodial parents gain financial stability for their families.

The majority of families involved in cases do not have a steady income and are unable to provide consistent files, consistent financial support to their families. Noncustodial parents are faced with significant barriers to employment because they often lack the necessary training and education to qualify for well-paying jobs. So, they often take jobs that pay wage is well below the federal poverty level. Additional seasonal or intermittent work and transportation challenges can lead to job and financial insecurity, especially in unplanned circumstances, when they must take on responsibilities of providing for additional children.

OCSS offered in, in correspondence that the rule being proposed to be rescinded because tribes already have the ability to offer employment and training services using tribal funds under other federal funding sources. We feel this decision was premature. While we do have other services, other programs do not account for providing training and employment opportunities for our population of over 200 open cases involving 285 children. Therefore, before rescinding the rule, the ability for other programs to absorb noncustodial parents should have been considered available housing, excuse me, should have been considered available funding and eligibility for other programs should have been addressed and tribal consultation should have been conducted. OCSS should not have simply should not simply assume that other tribal programs could meet this need.

Each tribe is unique, while every child, child is important. Thus, if a tribe has an unmet need, options should be, should not be eliminated no matter how many tribes have applied in the past. By rescinding this final rule only hinders tribal family stability and the opportunity for the noncustodial parent to be financially responsible to the family.

We respectfully ask that OCSS reinstate the option for tribes to apply for the 1115 waiver to enable us to provide this resource to our noncustodial parents. And I'd like to thank you for the opportunity to provide these comments. I look forward to your response.

Willowa “Sis” Horn, Child Support Enforcement Program Director, Fort Belknap Indian Community
I didn't get the permission to speak, but my president of the Council was supposed to be on today to present our testimony. I do have written a written statement. I don't know if you want me to read it or just submit it.

OK. Well, I will go ahead and, and read it. I will skip the first part where it mentions the president's name, but.

Thank you for the opportunity to testify before you today. We strongly oppose recission of the final rule to Employment and Training Services for Noncustodial Parents in the Child Support Program. The Fort Belknap Indian community urges the Office of Child Support Enforcement to maintain the final rule and continue to support employment and training services within the child support program.

The child support program establishes and enforces child support responsibilities. When parents do not live with their children, the laws enacted by Congress over the past five decades have generally strengthened child support programs and established a public understanding that noncustodial parents are expected to help their children as they grow up. We expect Congress to continue strengthening the child support based employment services function in rural tribal communities.

At Fort Belknap there's a strong emphasis on prioritizing children's needs and protecting them from stressors, which often translates into ensuring the child is loved and cared for by the parents, regardless of the parent marital status.

No duplication. Tribal service programs often partner effectively but face significant service gaps due to chronic underfund funding for employment, training, workforce development, education, health, transportation, and housing. Additionally, funding disrupts, like recent federal cuts and potential future funding freeze, freezes, disproportionately impact tribal programs and core services.

I, I just wanna add something here. We got a intergovernmental grant a few years back and one of the one of the goals of that program was for us to partner with our other tribal programs here on the reservation so that we were not duplicating services. We developed the referral form. If somebody came to my office and needed a payment for a driver's license, let's say, if he was not our client, I would refer him to either TANF for Tiwahe or one of the other programs that could help him.

So, we developed that partnership with tribal programs. We meet monthly, so we can say there's no duplication of services. At Fort Belknap, there's no service program offering a dedicated employment and training fund source specifically for the noncustodial parent target group. Not all noncustodial parents are automatically eligible for TANF, and they're not always enough funds to support noncustodial parent employment and training under the consolidated fund the tribe has under the 102-477 employment and training program.

Extending employment services reach. Funding from the Office of Child Support Enforcement, employing, employment and training services for noncustodial parent provides that service gap and adds flexibility.

Recognizing this in 2014, the Fort Belknap Child Support program successfully implemented the two-year Tribal Innovation Grant focusing on overcoming noncustodial parents' barriers and becoming gainfully employed. We demonstrated work with nine noncustodial parents each year with positive outcomes, three obtain custody of their children, three enrolled in college, and five gained employment. Focusing on the NCP to overcome their barriers and become gainfully employed.

That is why we, we were looking forward to the Office of Child Support Enforcement finalized rule retaining federal funding available for tribal agencies to provide employment and training services to noncustodial parents, allowing those programs to expand significantly and to strengthen our tribal child support partnerships with Montana Department of Labor, 477 employment and training, Tribal Employment Rights Office, the tribal court social services, head start and the Aaniih Nakoda College.

Complementary design. Child support employment service programs are designed to reach people where other systems do not. In 2024, the Fort Belknap dedicated months of time and work constructing a very effective and compelling pilot program application designed to help noncustodial parents find stable employment, increasing their ability to pay child support for the purpose to improve family life and positive outcomes of our tribal children.

It is a proactive program. It is proactive programs like this that complement the child support program to increase family income, improve financial stability, and help families make ends meet. These services to rural tribal communities honor tribal sovereignty, strengthen families, and create pathways to long term economic stability.

The Fort Belknap Indian Community Child Support Program 1115 waiver requested $2,000,000 in over a 5-year period to provide a holistic approach to job readiness, training, placement, apprenticeships, and other support services for parents participating in the IV-D program. In August 2025, on the verge of processing an award for our project, OCSE advised

us that our section 1115 waiver application was discontinued due to the employment training ruling in the process of being rescinded.

Compliance and fiscal responsibility. With employment and training services for noncustodial parents in the child support program, we can deliver measurable results that can increase the number of children receiving reliable child support. The average amount of current support and child support orders, the number of parents who access the services of this program, the number of parents who successfully complete this program, the number of parents in the child support program with reliable study income from rural economic industry, relevant work and improve the Child Support performance metrics of paternity established, order establishment, current support payments and arrear payments. Without employment support programming systems rely heavily on punitive enforcement, which is more expensive and less effective. I respectfully ask the Office of Child Support Enforcement to retain the final rule and continue supporting employment and training services for noncustodial parents within the child support program. Thank you.

Written testimony:

Bear River Band of the Rohnerville Rancheria:
Thank you for the opportunity to provide written comments about the resc1ss1on of the final rule, Employment and Training Services for Noncustodial Parents in the Child Support Program. We represent Bear River Band of the Rohnerville Rancheria as the Bear River Band Child Support agency. As a Tribal IV-D agency, we believe the rescission of the final rule would be detrimental to our tribal community. Respectfully, we urge the Department to maintain the final rule and continue to support employment and training services within the child support program.

Employment services are not duplicative within Bear River Band of the Rohnerville Rancheria boundaries. The claim that services are duplicated within our sovereign nation is false and unfounded. This claim also assumes there are equal opportunities and equal access to state and federal workforce systems which is not the reality of our Tribal community. Additionally, due to the rural nature of our community and location within the state of California, the workforce systems in the area are inaccessible and underfunded. Not only are employment and training services a valuable asset, but they allow for our agency to be problem-solving and solution focused instead of being enforcement services only.

The programs and services offered through child support agencies are designed to reach people that are unreachable through other services or systems. Due to the reach of employment and training services for noncustodial parents, agencies are also able to improve outcomes because the services are directly tied to child support obligations, family stability, and parental

engagement. As tribal communities, we emphasize the need for families to work together in whatever their situation may be. By offering employment and training services for noncustodial parents we are able to keep families closer together and strengthen the bonds the parents have with their children.

In most cases, a noncustodial parent is not refusing to pay support because they simply do not want to. In fact, the most common reason is due to unemployment and the lack of ability to pay. Through offering employment and training services for noncustodial parents, agencies are able to increase compliance with these cases. The increased compliance in turn, reduces arrears, lowers enforcement costs, and reduces long-term system involvement which align with federal efficiency and fiscal responsibility. Without the support employment and training services for noncustodial parents provides, agency systems rely more heavily on punitive enforcement which is shows to be more expensive and less effective. Employment services are a necessary preventative tool for child support which reduce the downstream costs across child support and judicial systems.

The impact of removing employment and training services for noncustodial parents will be felt by children, parents, families, and the tribal community as a whole. The gaps in service left by removing employment services from child support agencies will be further proof that the services provided are not duplicative within tribal nations. Additionally, employment services allow parents to understand that child support is a pathway to success, familial connection, and increased responsibility, not a punishment for being the noncustodial parent. Rescinding the rule would disproportionately harm Tribal communities by removing the flexibility we rely on. I respectfully as the Department to retain the final rule and continue supporting employment and training services within the child support program.

Thank you for your time and consideration,

Sincerely,
Janessa Bacon Program Manager

Megan Siaosi
Tribal Court Director

Central Council of the Tlingit & Haida Indian Tribes of Alaska:
On behalf of the Central Council of the Tlingit & Haida Indian Tribes of Alaska (Tlingit & Haida), we submit the following comments regarding the proposed rescission of the final rule on Employment and Training Services for Noncustodial Parents in the Child Support Program. We appreciate the Office of Child Support Enforcement's (OCSE) continued engagement with Tribal programs and the opportunity to provide input through this consultation.

Tlingit & Haida is a federally recognized Tribal government serving more than 38,000 enrolled citizens across Southeast Alaska and beyond. Our Tribal Child Support Program operates in a uniquely rural, geographically dispersed region characterized by limited road systems, high costs of living, seasonal employment, and persistent infrastructure constraints.

These comments are submitted in direct response to the rationale outlined in the Federal Register notice proposing rescission, including concerns related to regulatory scope, efficiency, and the appropriate use of Title IV-D funding. From a Tribal perspective, the final rule was consistent with the statutory purpose of the IV-D program, supported effective program administration, and aligned with the federal government's responsibility to ensure that child support policies improve outcomes for children and families.

The federal government's trust responsibility is grounded in the U.S. Constitution, federal statutes, and longstanding principles of federal Indian law. Tribal child support programs are an exercise of inherent Tribal sovereignty and serve as a critical mechanism for promoting the well-being of Tribal children, families, and communities. Any changes to federal child support policy must respect this government-to-government relationship and be responsive to the realities of Tribal IV-D programs in tribal communities.

From a Tribal perspective, rescinding the Employment and Training Services rule risks creating inefficiencies by fragmenting services across multiple agencies and programs. For families already facing geographic isolation, transportation barriers, and limited administrative capacity, this fragmentation results in higher costs, lower compliance, and poorer outcomes for children. Government efficiency should be measured by whether programs work together to meet families where they are, not by whether services are artificially separated across bureaucratic lines.

For Tlingit & Haida, effective child support outcomes are achieved through holistic, coordinated service delivery that addresses the underlying barriers preventing parents from meeting their obligations. Success is measured not only by enforcement actions taken, but by whether parents gain stability and capacity needed to provide consistent, reliable support for their children over time. It is a family-centered service that prioritizes the stability, safety, and long-term well-being of children. Many noncustodial parents in our service population want to meet their child support obligations but face substantial barriers to employment, including:

- Limited job availability in rural Southeast Alaska communities
- Seasonal and subsistence-based economies
- Extremely high costs of living and housing shortages
- Transportation barriers in communities accessible only by air or water
- Limited access to training, credentialing, and wraparound support services

In many of our communities, traditional enforcement tools commonly used by state programs, such as driver's license suspension, wage garnishment, or asset seizure, are often ineffective or unavailable. Many parents do not possess driver's licenses, maintain traditional banking relationships, or have stable attachable income. As a result, enforcement-only approaches frequently fail to produce sustainable child support outcomes.

Employment and Training services are therefore not duplicative of existing programs. Rather, they fill a critical service gap. Noncustodial parents are not always eligible for TANF or other workforce programs, and consolidated funding sources such as P.L. 102-477 must serve a broad population with limited resources. The E&T rule provided Tribes with flexibility to tailor services to the specific needs of noncustodial parents, including for non-Tribal noncustodial parents whose participation directly supports the well-being of Tribal children, an option that is otherwise unavailable under current regulations.

Tlingit & Haida's Tribal Child Support Unit (TCSU) demonstrates the effectiveness and scale of Tribal IV-D programs when families are supported through coordinated, community-based approaches. Tlingit & Haida's 2025 Annual Report shows that TCSU served 1,083 noncustodial parents, of whom approximately 473 identified as Tribal citizens and 610 were non-Tribal citizens. In 2024, TCSU surpassed its federal performance benchmark and distributed more than $1.2 million in child support to families, directly reducing financial hardship and strengthening outcomes for Tribal children. Child support services were delivered across Southeast Alaska and beyond, including urban centers and remote, roadless communities, reflecting both the geographic breadth of the program and the complexity of service delivery in Tribal contexts.

Tlingit & Haida's Tribal Court opened 65 new child support cases in 2024 and held 548 hearings, underscoring the administrative and judicial resources required to operate an enforcement-centered system. Annual child support collections have consistently exceeded $1 million in recent years. Employment-focused approaches that improve income stability for noncustodial parents reduce reliance on court intervention, lower enforcement costs, and increase the likelihood of sustained compliance over time.

These outcomes are reflected in individual case successes. In one recent case, a Tribal citizen noncustodial parent was referred by TCSU to Employment Support Services for individualized assistance, including resume and cover letter development and interview preparation for a specific job opportunity. The parent successfully obtained and maintained employment, enabling TCSU to initiate active child support enforcement through the issuance of the case's first income withholding order. This case illustrates how employment and training services

directly increase a parent's ability to pay and allow IV-D enforcement tools to function as intended, supporting consistent, ongoing compliance.

The Tribe's broader workforce and employment data further demonstrate that employment services produce measurable results. In 2024, Tlingit & Haida's Employment and Training programs served more than 150 individuals through job placement, work experience, and vocational rehabilitation services, with participants successfully securing or maintaining employment. These outcomes reflect the Tribe's capacity to deliver employment services effectively and to integrate them with family-serving systems when funding and policy flexibility are available.

The Employment and Training Services final rule was issued in December 2024 and was well received across Indian Country. Tribal child support programs, including Tlingit & Haida's TCSU, were in the early stages of planning and program development to implement services authorized under the rule when notice of the proposed rescission was issued. In reliance on the final rule, Tribal programs devoted significant staff time and administrative capacity to program design, coordination with partners and internal planning, representing real costs carried by Tribes in anticipation of federal support. As a result of the proposed rescission, Tribal programs have not been afforded sufficient time or stability to operationalize these services or generate outcome data. Rescinding the rule at this early stage prevents the Office of Child Support Enforcement from meaningfully evaluating whether the policy would have improved compliance, reduced enforcement costs, or strengthened outcomes for children and families.

A critical aspect of the final rule was its recognition that effective child support outcomes often require services to be provided to noncustodial parents regardless of Tribal citizenship status. Many child support cases served by Tlingit & Haida involve families in which the custodial parent and child are Tribal citizens, but the noncustodial parent is not. The final rule allowed Tribal IV-D programs to provide employment and training services to these non-Tribal parents when doing so directly supported the well-being of Tribal children.

If the rule is rescinded, Tribal programs will be forced to withhold supportive services from non-Tribal noncustodial parents, even when those services would directly benefit Tribal children and improve child support compliance. This creates inequitable outcomes for Tribal families based solely on the citizenship status of one parent and undermines the child-centered purpose of the IV-D program.

These challenges are further deepened by uncertainty surrounding other mechanisms intended to support innovation and flexibility within the child support system.

Section 1115 waiver authority has historically served as an important mechanism for allowing child support programs to test innovative approaches that improve outcomes for children and families, including services that address barriers to employment, stability, and compliance.

Tribal child support programs viewed the Employment and Training Services final rule as complementary to, rather than duplicative of, this waiver authority—providing clearer regulatory grounding for employment-focused strategies within IV-D programs.

The proposed rescission of the final rule creates uncertainty regarding the scope of services that may be approved under Section 1115 waivers and risks discouraging Tribes from pursuing innovative, family-centered approaches. Even where waiver authority technically remains available, rescinding the rule signals a narrowing of what the OCSE considers appropriate use of IV-D funds, thereby chilling Tribal innovation and long-term planning.

This concern is compounded by the fact that Tribal child support services are not consistently eligible for inclusion in P.L. 102-477 plans. Tlingit & Haida has been denied the ability to integrate Tribal Child Support services into its 477 plan, limiting the Tribe's ability to braid funding or provide coordinated employment and training services through alternative workforce programs. The Employment and Training Services final rule therefore represented one of the few viable pathways for Tribal IV-D programs to address employment barriers for noncustodial parents, particularly those who are not eligible for TANF or other workforce programs.

Rescinding the rule without a clear alternative framework disproportionately harms Tribal programs, reduces service integration, and leaves significant gaps in support for families. Sustainable child support outcomes in Tribal communities depend on policies that strengthen families, expand economic opportunity, and recognize the unique circumstances of Tribal IV-D programs. The December 2024 final rule was firmly grounded in existing statutory authority, supported by decades of research cited by OCSE itself, and designed to improve the effectiveness of the child support program by aligning enforcement with parents' ability to pay.

Rescinding the rule at this early stage, before Tribes were able to implement services or generate outcome data, does not advance lawful governance or government efficiency. Instead, it risks increasing administrative costs, fragmenting services, and undermining the child-centered purpose of the IV–D program, particularly in rural and Tribal communities.

Tlingit & Haida respectfully urges the OCSE to reconsider the proposed rescission or, at a minimum, to work collaboratively with Tribes to develop alternative guidance that preserves Tribal flexibility, supports integrated service delivery, and ensures that child support policy continues to serve the best interests of children and families.

Thank you for the opportunity to provide comments. Should you have any questions, please contact Barbara Laman, Tribal Child Support Unit Manager, blaman@tlingitandhaida.gov or 907-463-7114.

Gunalchéesh / Haw'aa,
Richard J. Peterson
President

Cherokee Nation:
On behalf of the Cherokee Nation, I write to oppose the proposed rescission of the final rule Employment and Training Services for Noncustodial Parents in the Child Support Program. This rule has allowed our Tribal child support program to provide employment and training services to noncustodial parents. While we recognize the importance of due diligence and efficient use of tax dollars, this final rule does not provide a duplicative service and uniquely enables the Cherokee Nation to improve child support outcomes.

In 2023, Cherokee Nation Child Support Program applied for and was awarded the Next Generation Child Support Employment Services Demonstration Grant, a five-year award intended to provide more than $2 million to support job readiness, training, apprenticeships, and supportive services for noncustodial parents. Using this funding, we developed a comprehensive pilot program called Reaching for Innovative and Stable Existence, otherwise known as the RISE Project. However, in September 2025, one month before RISE was set to start, our program was informed that the grant period had been reduced from five years to two years and that the original funding amount would no longer be provided due to the pending rule rescission. Despite this setback, we moved forward and launched the RISE Project in October 2025.

Since then, nine noncustodial parents have been referred for services. In this short four-month period of our pilot program running, two noncustodial parents have gained employment and are meeting their child support obligations. But these successes don't end there. One of these parents has begun to rebuild a relationship with their child, an outcome equally meaningful for child well-being. In total, over $800 in child support has already been collected from the two employed participants, facilitating payments that had not occurred previously. One RISE participant has now exited contempt status after sustained compliance, reducing enforcement costs and court involvement. These outcomes demonstrate that the employment services provided by RISE are not duplicative, instead our program reaches individuals who are not successfully served by traditional workforce services or child support enforcement models.

If the program is halted due to the rescinded rule, these critical support services will end, leaving noncustodial parents without the tools they need to become stable, healthy, and financially responsible parents. This rescission would widen existing service gaps and significantly reduce our ability to support and guide parents through difficult and complicated processes in becoming job-ready and financially stable citizens. Other programs provided by the Cherokee Nation do not account for these specific needs currently being met by this program, due to differing eligibility requirements for services, and would leave our citizens without a pathway to replace these job readiness services. This enhanced support and flexibility, enabled by the original Final Rule change, empowers the Cherokee Nation to reach our members who often fall outside other support systems and has directly improve child support compliance. Disrupting the RISE Project and removing these services will undermine the progress underway and increase long-term costs.

In the event that the proposed rescission of the rule is related to the One Big Beautiful Bill (OBBB) work/community engagement requirements, please note that American Indian and Alaska Native individuals are expressly exempt from these requirements (see Sections 71119 and 10102 of OBBB), and the same rationale should be applied in the deliberations to keep the non-custodial parent rule.

The Final Rule has authorized the Cherokee Nation to increase the number of children receiving consistent, reliable support, strengthen family stability, and reduce reliance on punitive enforcement measures. If this rescission is allowed to go through, it will undo the successes already demonstrated and hinder our ability to meet the individualized needs of our people. For these reasons, Cherokee Nation urges the Administration for Children and Families to retain the Final Rule allowing Tribal child support programs to provide employment and training services to noncustodial parents and enable Indian Country to continue to meet the needs of our citizens with support decided at the community level.

Sincerely,
Chuck Hoskin, Jr.
Principal Chief of the Cherokee Nation

Eastern Shoshone Tribe:
Historically, our Tribe, the Eastern Shoshone or Kuchun-deka (Buffalo Eaters), were living on the eastern edges of the Great Basin along the upper Green River Valley, Big Sandy River and Wind River eastward to the Wind River Basin and Bighorn Basin of western Wyoming and southwestward to Bear Lake and Great Salt Lake in southeast Idaho and northern Utah, they possessed from all Shoshone bands the greatest horse herds, also called Plains Shoshone, later called Washakie Shoshone or Wind River Shoshone.

Our Chief Washakie emerged as a leader among the Shoshone, known for his war prowess as well as his ability to negotiate with whites, he was fluent in English and a friend and father-in-law of Jim Bridger, Washakie championed the establishment of the Shoshone Reservation through negotiations at the 1863 treaty (44 million acres, around 70,000 square miles) and the subsequent 1868 treaties at Fort Bridger (diminished to 1,000 square miles). Many Shoshone individuals expressed dissatisfaction with the treaty's terms. They felt that the reservation established was inadequate and did not reflect the true needs of the community. Additionally, the failure of the federal government to uphold its promises regarding goods and services led to frustration and anger among the Shoshone. This disillusionment would continue for generations, as the U.S. government repeatedly failed to meet its obligations to the tribe. Today, the Shoshone Reservation, now the Wind River Reservation, covers 2.2 million acres.

The Eastern Shoshone Child Support Program (ESCSP) was established in 2007. Last year, the OCSS advertised that there was a non-competitive 1115 Grant Waiver that all Tribal Child Support Programs were eligible to apply for. Our ESCSP applied for the grant and was later notified that the OCSE would no longer be funding the 1115 Grant Waiver. The notification stated, "As you are aware, the Employment and Training Rule, effective January 13, 2025, allowing state and tribal child support agencies to use federal funds for employment services for noncustodial parents to improve their ability to meet child support obligations, is in the process of being rescinded. ACF is focused on having the child support program maintain a level of excellence in performing its core functions. Employment and training fall outside of that scope. Therefore, we are advising you to discontinue working on your Section 1115 Waiver application focused on employment and training".

Earlier this fall, our office was notified that we could submit written testimony for consultation regarding rescinding the rule on Employment and Training Services for Noncustodial Parents in the Child Support Program.

This office applied for and did not receive approval from the OCSS; this decision was based on the government's decision that Employment and Training fall outside the scope of the program's core functions. The initial decision to allow the 1115 Waiver for Employment and Training at some point was important enough to subsequently approve the 1115 Waiver to begin with. The Shoshone Tribe is disappointed that potential support from the federal government has been rescinded. We are in favor of OCSE reevaluating its decision and funding this important assistance needed to strengthen the NCP's ability to support their children. Approval of this funding for our Tribe will enable parents to provide for their children. Your help with employment and training will greatly improve the lives of our families, especially the Eastern Shoshone children.

A recent tally by the State of Wyoming revealed that only 60% of Native Americans complete high school, compared to 80% of White students. The Wind River Reservation dropout rate is 40%, more than twice the state average of Wyoming. The reservation has struggled with an alarming percentage of unemployment. According to a 2005 Bureau of Indian Affairs report, the Eastern Shoshone Tribe's unemployment rate was 84%.

Our office had planned to use the Waiver funding to focus on the non-custodial parents to assist with education, job training, and job placement. If funding were to become available, priority will be given to child support clients to provide support to the NCPs. Assisting and advocating for them to finish school and continue on to post-high-school training and college was to be one area we would work on. If we were to receive funding to assist our child support clients, they would receive priority with the assistance that is sorely needed in this community. Presently, little assistance is provided for the community, the assistance that is in place is inadequate and many child support clients are put on waiting lists because there isn't enough local support in place to service everyone. Please reconsider the funding of the 1115 Waiver so that we can improve and strengthen the lives of our Eastern Shoshone families. Thank you.

Sincerely,
Wayland K. Large, Chairman
Eastern Shoshone Tribe

Fort Belknap Indian Community:
Thank you for the opportunity to testify before you, at this consultation. I am the President of the Fort Belknap Indian Community (FBIC), Montana, home of the Aaniiih and Nakoda peoples. Fort Belknap is a federally recognized Tribe and Tribal government organization that operates Tribal child support program. I strongly oppose rescission of the final rule to Employment and Training services for noncustodial parents in the child support program. The Fort Belknap Indian Community urges the Office of Child Support Enforcement to maintain the final rule and continue to support employment and training services within the child support program.

The child support program establishes and enforces child support responsibilities when parents do no live with their children. The laws enacted by Congress over the past five decades have generally strengthened child support programs and established a public understanding that noncustodial parents are expected to help support their children as they grow up. We expect Congress to continue strengthening the child support-based employment services functions in rural tribal communities.

At FBIC, there is a strong emphasis on prioritizing children's needs and protecting them from stressors, which often translates into ensuring the child is loved and cared for by the parent's regardless of the parents' marital status.

No duplication
Tribal service programs often partner effectively but face significant service gaps due to chronic underfunding for employment and training, workforce development, education, health transportation and housing. Additionally, funding disruptions like recent federal cuts and potential future funding freezes disproportionately impact tribal programs and core services.

At Fort Belknap, there is no service program offering a dedicated employment and training fund source specifically for the noncustodial parent target group. Not all noncustodial parents are automatically eligible for TANF and there are not always "enough" funds to support noncustodial parent employment and training under the consolidated funds the Tribe has under its P.L. 102-477 Employment and Training Program.

Extending employment services reach
Funding from the Office of Community Enforcement Employment and Training Services for noncustodial parents in Child Support provides that service gap and added flexibility. Recognizing this, in 2014 the Fort Belknap child support program successfully implemented the Tribal Innovation Grant focusing on overcoming noncustodial parents' barriers and becoming gainfully employed. We demonstrated work with 9-noncustodial parents each year with positive outcomes; 3-obtained custody of their children, 3-enrolled in college, and 5-gained employment. Focusing on the NCP to overcome their barriers and become gainfully employed. That is why we were looking forward to the Office of Child Supports finalized rule retaining federal funding available for tribal agencies to provide employment and training services to noncustodial parents allowing these programs to expand significantly and to strengthen our FBIC Tribal child support partnerships with MT Department of Labor, 477 Employment/Training Program, Tribal Employment Rights Office, Tiwahe, Courts, Social Services, Head Start and the Aaniiih Nakoda College.

Complementary Design
Child support employment service programs are designed to reach people where other systems do not. In 2024, Fort Belknap dedicated months of time and work constructing a very effective and compelling pilot program application designed to help noncustodial parents find stable employment, increasing their ability to pay child support for the purpose to improve family life and positive outcomes of our tribal children. It is proactive programs like this that complement the child support program to increase family income, improve financial stability, and help families make ends meet. These services to rural tribal communities honor tribal sovereignty, strengthen families, and create pathways to long-term economic stability.

The Fort Belknap Indian Community's Child Support Program's 1115 waiver requested $2,000,000.00 in funding over a 5-year period to provide a holistic approach to job readiness, training, placement, apprenticeships and support services for parents participating in the IV-D program.

In August 2025, on the verge of processing an award for our project, OCS advises us that our Section 1115 waiver application was discontinued due to the Employment and Training rule in process of being rescinded.

Compliance and Fiscal responsibility
With employment and training services for noncustodial parents in the child support program we can deliver measurable results that can increase: the number of children receiving reliable child support, the average amount of current support in child support orders, the number of parents who access the services of this program, the number of parents who successfully complete this program, the number of parents in the child support program with reliable, steady income from rural economic industry relevant work, and improve the child support performance metrics of paternity establishment, order establishment, current support payments, and arrearage payments. Without employment support programming, systems rely heavily on punitive enforcement, which is more expensive and less effective.

I respectfully ask the Office of Child Support Enforcement to retain the final rule and continue supporting employment and training services for noncustodial parents within the child support program. Thank you.

Lac Courte Oreilles Band of Lake Superior Chippewa Indians:
The Lac Courte Oreilles (LCO) Band of Lake Superior Chippewa Indians welcomes the opportunity to provide written comments and testimony for the virtual Tribal Consultation on the possible recission of the final rule: *Employment and Training Services for Noncustodial Parents in the Child Support Program*. Representatives from the Lac Courte Oreilles Tribal Governing Board and Lac Courte Oreilles Child Support Services (LCOCSS) attended the virtual Consultation; Secretary Treasurer Michelle Beaudin provided oral testimony at the Consultation. We appreciate the time provided to accept written comments. We express our strong support for the **retention** of the final rule.

LCO Tribal Governing Board supports LCOCSS and the efforts of other Tribes, States, and national organizations to provide education on the need for employment services directly from child support staff. Child support programs offer unique access to individuals to promote employment and training services in companion with parenting skills. The LCO Tribal Governing Board, like the Administration for Children and Families, recognizes the importance

of increasing the collection of child support because the awareness of financial responsibility of parents is directly related to the increase in child support payments. How we increase that awareness of financial responsibility is directly tied to an understanding of parenting roles.

October 1, 2025, LCO Child Support began implementation of the Mino-Bimaadiziwin (the Good Life) Pilot Program. Our experiences have been, when noncustodial parents first come in for an assessment, they are often hesitant, expecting "more hoops to go through and no help." By the time they leave, they feel hopeful and encouraged because they've discovered a place that honors who they are and where they come from. The reason is simple: we take a holistic approach rooted in Lac Courte Oreilles cultural values. Our program addresses the full spectrum of challenges they face, such as substance use, alcohol dependency, mental health concerns, and reentry after incarceration, while reconnecting them to their identity, traditions, and parenting respectfully. The Mino Bimaadiziwin programming integrates the Tribally relevant Seven Grandfather Teachings (Truth, Humility, Respect, Love, Courage, Honesty, Wisdom) into every session; reminding parents of their sacred responsibilities to family and community. These teachings help restore balance and self-worth, fostering healthy relationships with their co-parent and strengthening ties to their tribal heritage. This foundation of traditional teachings transforms the program from a service into a path of healing and empowerment, which teaches inspires parents to prioritize their children's well-being and recognize the need for consistent child support obligations. The Seven Grandfather Teachings create stronger family bonds, increased financial support, and brighter futures for their children by reconnecting parents to traditional values through responsible parenting and economic upward mobility.

Success stories are important to help understand the importance of *Employment and Training Services for Noncustodial Parents in the Child Support Program* such as the Mino Bimaadiziwin program. One account of a parent in the LCO Child Support's Mino Bimaadiziwin is as follows: a young parent was extremely anxious when he had an upcoming child support court appearance. His previous court appearances usually ended in arrest. He learned through attending several Mino Bimaadiziwin sessions how to prepare for court. He was encouraged to write down his accomplishments and goals both within our program and in other supportive services, including his steps to provide for his children and respect for his co-parent. When he presented his accomplishments, the Court recognized those and encouraged his efforts. Instead of being arrested, he left feeling proud and motivated. He accepted full responsibility for his past actions and is now actively working to correct them in a way that benefits his children and strengthens his role as a parent in his employment efforts.

Approximately 25% of referrals to our program originate from court recommendations, while 75% come from Child support Caseworkers. Of those referred, nearly 50% enroll and actively participate in our services. This demonstrates the critical role these programs play in engaging

parents and supporting compliance with child support obligations. A noncustodial parent participating in the Mino Bimaadiziwin Program increases the likelihood of paying child support through wage withholding and increases the effectiveness of the tribal child support program.

LCO Tribal Governing Board recognizes the need for programs to provide well-coordinated and non-duplicative training services. We ensure that our services for non-custodial parents are not duplicated; we use formal Memorandums of Understanding (MOUs) to refer to participants to specialized services already in place, such as career development, substance use treatment, and mental health support.

During our initial assessment, we carefully review which programs each parent is currently engaged with to avoid duplication and ensure coordination with agencies. This approach allows us to focus on filling gaps rather than duplicate efforts, creating a streamlined and effective network of resources for parents.

Lac Courte Oreilles Child Support Program has taken into consideration other tribal agencies providing employment services, such as TANF, Workforce Resource, Vocational Rehabilitation, by developing policy and procedures to ensure that noncustodial parents are not receiving the same employment and training services from other federally-funded employment and training programs.

In the course of the virtual Tribal Consultation on January 15, 2026, presenters from the Office of Child Support Services cited two main reasons for considering the rescission of the *Employment and Training Services for Noncustodial Parents in the Child Support Program*: compliance with Executive Order 14219 being focused on the cost per year, as well as a concern that the Final Rule overlaps with existing programs. Addressing the statement regarding of overlap in the Final Rule, we note that previously, the Office of Child Support Services did address any overlap by stating clearly in the Final Rule that States and Tribes are **not allowed** to provide a noncustodial parent the same employment and training services from other federally-funded employment and training programs. Lac Courte Oreilles Child Support Program has noted above that such safeguards are in place.

The Final Rule for *Employment and Training Services for Noncustodial Parents in the Child Support Program* was considered for over a decade through Pilot Programs at the Office of Child Support Enforcement, as well as research going back to the 1990s on the effectiveness of working with unemployed and underemployed parents who owe child support. The invitation to attend Tribal Consultation was sent out a year and two days from the publication of the Final Rule; given that the Office of Child Support Services took over a decade to examine this issue and the benefits to families in our programs, rescinding such a well-reasoned Final Rule after

one year should be given more time and examination.

The Lac Courte Oreilles Tribe is a federally recognized tribe located in Northern Wisconsin and one of eleven federally recognized tribes in Wisconsin. Lac Courte Oreilles Child Support Program has had a comprehensive Tribal IV-D child support program since 2013. In that time we have realized that our agency has unique access to addressing the high unemployment of noncustodial parents, both through direct office contact as well as court action.

In closing, the Lac Courte Oreilles Band of Lake Superior Chippewa Indians supports the *retention* of the final rule: *Employment and Training Services for Noncustodial Parents in the Child Support Program*. Miigwech (thank you) for taking our comments under consideration.

Sincerely,
Gary Clause, Chairman
Lac Courte Oreilles Band of Lake Superior Chippewa Indians

Lummi Indian Business Council:
The Lummi Nation is a federally recognized sovereign Nation located within Whatcom County in the Pacific Northwest with more than 5,000 tribal members. The reservation sits on over 1,200 acres of land and upwards of 2,000 acres when including tidelands. Being one of the first self-governance tribes, Lummi employs and administers its own governance service including: tribal court, police department, Behavioral Health, Health Clinic, Education, TERO (Tribal Employment Rights Ordinance), Natural Resources, Information Technology, Child Welfare, Re-Entry Services, Communication, among other services. Our Nation is a federally funded tribal IV-D child support program.

We appreciate the Office of Child Support Services' continued engagement with tribal programs and the opportunity to provide input through this tribal consultation. We respectfully submit our written comment here.

The Lummi Nation disagrees with the Office of Child Support Services' decision to rescind the final rules for Employment and Training Services for Noncustodial Parents in Child Support, adopted in January 2025. Tribal communities, including Lummi, face economic barriers preventing non-custodial parents from obtaining economic stability, thereby reducing their ability to comply with their child support obligations. Additionally, tribal child support programs operate with fewer enforcement tools than state programs, only furthering the need to focus on employment and income stability to achieve consistent child support compliance in our communities.

The OCSE's rule on employment and training services for non-custodial parents exists because of demonstrated engagement from non-custodial parents when they have access to employment. The Lummi Nation believes it would be short sighted to rescind the rule only a year after it was adopted, which doesn't allow for it to prove resourceful and beneficial to the community and families it serves.

For further information, please feel free to reach out to our Department Director, Shasta Cano-Martin via phone 360-312-2281 or by email ShastaCM@lummi-nsn.gov and/or our Child Support Program Manager, Kelly Jefferson by phone 360-312- 2230 or email at KellyJ@lummi-nsn.gov.

Sincerely,
Anthony Hillaire
Chairman

Modoc Nation:
This letter is written in support of the continuation of the Final Rule - Employment and Training Services for Noncustodial Parents in the Child Support Program ("Final Rule").

The Final Rule allows child support programs to provide job search assistance, job readiness training, job development and training services, skill assessments to facilitate job placement, and job retention services. Additionally, the Final Rule authorizes child support programs to provide work support, including transportation assistance, uniforms, and tools. These services assist non-custodial parents in obtaining sustainable employment.

Because of the sustainable employment gained from the employment and training services authorized by the Final Rule, non-custodial parents are better able to consistently pay their child support obligations. Thus, the Final Rule directly contributes to the enhanced financial stability of children and families. Moreover, the ability of the non-custodial parent to financially support their children promotes self-sufficiency, responsible parenthood, and positive family engagement.

In addition to increasing the regularity of child support payments, the employment and training services authorized by the Final Rule reduce a child support programs' reliance on enforcement actions, which have been shown to be largely ineffective. The employment and training services authorized by the Final Rule also reduce child support arrears and reduce enforcement costs of child support programs. These results align with the federal goals of efficiency and fiscal responsibility provide work support, including transportation assistance, uniforms, and tools. These services assist non-custodial parents in obtaining sustainable employment.

Because of the sustainable employment gained from the employment and training services authorized by the Final Rule, non-custodial parents are better able to consistently pay their child support obligations. Thus, the Final Rule directly contributes to the enhanced financial stability of children and families. Moreover, the ability of the non-custodial parent to financially support their children promotes self-sufficiency, responsible parenthood, and positive family engagement.

In addition to increasing the regularity of child support payments, the employment and training services authorized by the Final Rule reduce a child support programs' reliance on enforcement actions, which have been shown to be largely ineffective. The employment and training services authorized by the Final Rule also reduce child support arrears and reduce enforcement costs of child support programs. These results align with the federal goals of efficiency and fiscal responsibility.

Despite the direct positive impact to children and families, opponents of the Final Rule suggest that it results in duplicative services. In many tribal areas, however, workforce systems are fragmented, underfunded or inaccessible. This means that removing the ability of child support programs to provide employment and training services would disproportionately harm tribal communities. Moreover, non-custodial parents involved in the justice system solely because of their child support obligations tend to be ineligible for traditional workforce programs. Consequently, the employment and training services authorized by the Final Rule often function as the only employment and training services available to non-custodial parents. Removing the ability of child support programs to provide employment and training services will not result in a redirection of non-custodial parents to other programs. Instead, it will remove the non-custodial parent's access to employment and training services entirely.

The employment and training services allowed by the Final Rule honor tribal sovereignty, strengthen families, and create pathways to long-term stability. The employment and training services allowed by the Final Rule also align with the mission of the Office of Child Support Enforcement, to ensure the well-being of children while encouraging parents' ability to meet their support responsibilities. I, therefore, respectfully ask the Office of Child Support Enforcement to retain the Final Rule and continue support of employment and training services in child support programs.

Thank you for your time and consideration.

Sincerely,
Chief Robert Burkybite
Modoc Nation

National Tribal Child Support Association:
On behalf of the National Tribal Child Support Association, I am writing this letter in support of retaining the child support final rule that preserves tribal child support-based employment services. Retaining the rule respects the tribes' inherent right to govern themselves and to design, administer, and manage programs that serve their citizens, rather than having those programs imposed or controlled by outside governments. By exercising rights of self-determination tribes can improve economic stability and family well-being.

Employment and training services play a critical role in assisting non-custodial parents to achieve stable employment, improve job readiness, and increase earning capacity. These services directly contribute to consistent child support payments, enhance financial stability, and improved outcomes for tribal children and families. Tribal child-support employment services means that our tribes can design integrated approaches that both promote employment rather than punishment and strengthen families while enforcing child support.

Indian self-determination is best advanced when tribes retain the authority to design and administer child support-based employment services that reflect their unique legal, economic, and cultural values. The final rule supports these principles by allowing tribal programs, the flexibility to integrate employment services, designed to promote compliance, and improve outcomes for tribal children. Retaining the rule honors tribal sovereignty, aligns with federal trust responsibilities, and recognizes that tribes are best positioned to develop effective, community driven solutions rather than relying on one-size-fits-all approaches.

Several arguments can be made, including:

1. **Supports Tribal Sovereignty and Self-Determination.** Retaining the rule respect tribes' authority to administer and design employment services in culturally appropriate and effective ways that meet community needs.
2. **Improves Child Support Through Employment.** Employment is one of the strongest predictors of consistent child support payments and increases the ability to meet support obligations.
3. **Strengthens Family and Child Well-Being.** When parents are employed and able to pay child support, children benefit directly through greater financial stability. These services contribute to better long-term outcomes for children in tribal communities.
4. **Addresses Unique Barriers in Tribal Communities.** Many tribal communities face challenges such as limited job markets, geographic isolation, and historical underinvestment. Tribal employment programs respond to these realities in ways that other programs cannot.
5. **Promotes Equality and Access to Services.** Eliminating the rule would disproportionately harm tribal families by reducing access to employment support

available elsewhere. Retaining the Rule allows tribes the ability to provide comparable services as state programs.

6. **Reduces Reliance on Public Assistance.** By helping parents secure employment and meet child support obligations through tribal employment services can decrease reliance on public assistance programs, generating long-term savings for federal, state and tribal governments.
7. **Preserves Program Stability and Investments.** Tribes have made significant investments in staffing, partnerships, and infrastructure to implement these services. Retaining the final rule avoids program disruption, loss of expertise, and wasted federal and tribal resources.

Based upon the information provided herein, we respectively ask the Office of Child Support Enforcement to retain the final rule and continue supporting employment and training services with the child support program.

Thank you for your time and consideration,

Sincerely,
William E. Woods Jr.
President – National Tribal Child Support Association

Nez Perce Tribe:
The Nez Perce Tribe ("Tribe") is a federally recognized tribe located in north-central Idaho, with more than 3,500 enrolled members. The Nez Perce Reservation encompasses approximately 770,000 acres. Within Idaho, the Nez Perce Tribe Child Support Program is one of three federally funded Tribal Title IV-D child support programs. We appreciate the Office of Child Support Services' continued engagement with Tribal programs and the opportunity to provide input through this Tribal Consultation.

The United States' trust responsibility to the Nez Perce Tribe is grounded in, among other authorities, the Treaties of 1855, 1863, and 1868, which affirm the Tribe's inherent sovereignty and the federal obligation to support the health, welfare, and well-being of our people. Federal child support policy must be implemented in a manner consistent with these treaty obligations and the government-to-government relationship.

Employment and Training Services for Noncustodial Parents
For the Nez Perce Tribe, child support is not solely an enforcement mechanism. It is a core family-support function of Tribal governance, grounded in our responsibility to ensure the well- being of children and promote stability for families within our community.

Many noncustodial parents served by Tribal child support programs want to meet their obligations but face persistent barriers related to employment. These barriers include limited job availability in rural reservation communities, transportation challenges, seasonal or intermittent work, and broader economic conditions that affect income stability. Rural reservation infrastructure realities–including long travel distances, limited public transportation, and constrained access to employers and services-further compound these challenges.

In addition, many Tribal child support programs operate with fewer enforcement tools than state programs. In our communities, commonly used enforcement mechanisms-such as driver's license suspension, professional license suspension, or bank account levies––may be unavailable or ineffective because many parents do not hold licenses, maintain traditional banking relationships, or have attachable assets. Tribal courts and law enforcement systems also face capacity constraints, including limited jail space and staffing shortages, which further restrict the practical use of enforcement remedies. As a result, employment and income stability are often the most effective and realistic means of achieving sustained child support compliance in Tribal communities.

The Tribe recognizes the importance of reducing unnecessary regulatory burden; however, rescinding the final rule without clear replacement guidance may unintentionally narrow child support policy toward an enforcement-only framework. Long-term success depends on supporting parents' capacity to work and maintain stable income.

Conclusion
The Nez Perce Tribe appreciates the opportunity to provide comments and respectfully urges OCSS to continue honoring tribal sovereignty, the federal trust responsibility, and the unique realities of Tribal IV-O programs.

For further questions or clarification, please contact Lilly James, Director, Nez Perce Tribe Child Support Program, at (208) 621-3869 or lillyj@nezperce.org.

Shannon F. Wheeler
Chairman

Northern Arapaho Business Council:
Thank you for the opportunity to testify before you, at this consultation. I am the Chairman of the Northern Arapaho Tribe. I oppose the recission of the final rule to Employment and Training services for noncustodial parents in the Northern Arapaho Child Support Program (NACSP). The Northern Arapaho Tribe respectfully requests that the Office of Child Support maintains the final rule and continues to support employment and training services within

NACSP.

The Northern Arapaho Tribe resides on the Wind River Indian Reservation in Wyoming. The distances are vast and the unemployment rate is high. Although there may be some duplicate services with regards to employment services, these services are not easily accessible due to distance. NACSP is located in Riverton, Wyoming where a lot of our clients reside and also the strongest local resource for employment. Maintaining employment and training services with child support will reach a large part of our clients.

Maintaining an employed client base allows our noncustodial parents to meet their financial responsibilities. This means less enforcement and a more supportive approach towards child support. By eliminating employment and training services, this will only create large gaps for our noncustodial parents and negatively impact the tribal community.

We respectfully ask that the Office of Child Support Enforcement to retain the final rule and continue supporting employment and training services for noncustodial parents within the child Support Program.

Thank you,
Keenan Groesbeck
Chairman of Northern Arapaho Business Council

Oneida Nation:
On behalf of Oneida Nation, I respectfully submit these written comments regarding the Office of Child Support Enforcement's proposal to rescind sections of the final rule concerning Employment and Training (E&T) services for noncustodial parents in Tribal child support programs. This issue was discussed during the Tribal consultation held on January 15, 2026.

Staff from the Oneida Nation Child Support Agency (ONCSA) attended virtually but did not provide verbal comment. We appreciate the opportunity to do so now on behalf of the Nation.

The Office of Child Support Enforcement is proposing to remove the following regulatory provisions:

- 45CFR 309.121
- 45CFR 309.65(b)
- 45CFR 309.145(c)(5)
- 45CFR309.155(f)

The Oneida Nation Child Support Agency (ONCSA) strongly opposes rescinding these regulations.

The E&T provisions in the current rule offered ONCSA a long-awaited opportunity to develop a dedicated Employment and Training program specifically for noncustodial parents. Our service population includes a significant number of non-tribal noncustodial parents who do not qualify for similar employment or education services offered through other Oneida Nation programs. This regulatory framework would have finally allowed ONCSA to fill that gap and support all parents—regardless of Tribal enrollment status—who are working to meet their child support obligations.

Our overarching goal is to help parents achieve sustainable employment so they can fully meet their financial and parental responsibilities. Rescinding these regulations will severely limit our ability to provide services that are essential to that mission, including:

- Job search assistance
- Job readiness training
- Job development and placement
- Skills and barrier assessments
- Job retention and ongoing support
- Critical work supports such as transportation assistance, uniforms, and tools

Without these regulatory authorities, ONCSA loses a vital mechanism for supporting parents who want to comply with their obligations but face employment barriers that are entirely addressable through structured support.

Removing these regulations does not reduce administrative burden—it undermines the ability of Tribal child support agencies to offer holistic, culturally informed, and community-based services. It also disproportionately harms the children who rely on consistent financial support from both parents.

For these reasons, Oneida Nation urges OCSE to maintain the current Employment and Training provisions in 45 CFR Part 309 and halt efforts to rescind the rule. We respectfully request continued dialogue with Tribal Nations so that federal policy supports the well-being of Native children and families, rather than limiting the tools available to Tribal programs.

Yawʌʔkó (Thank you) for the opportunity to provide these comments and for recognizing the unique government-to-government relationship between Tribes and the United States.

If there is any additional information you may need, please feel free to contact me at thill7@oneidanation.org or by calling (920) 869-2214.

With a Good Mind, a Good Heart, and a Strong Fire,

Tehassi tasi Hill, Chairman
Oneida Nation

Port Gamble S'Klallam Tribe:
The Port Gamble S'Klallam Tribe is a federally recognized sovereign Indian Tribe and signatory to the Treaty of Point No Point of 1855, comprised of approximately 1,536 enrolled members and is located on the northern end of the Kitsap Peninsula in Western Washington. The mission of the Tribe is to exercise sovereignty and ensure self-determination and self-sufficiency of tribal members.

The Port Gamble S'Klallam Tribe (PGST) is one of the nine original tribes in the nation operating a child support program under the interim final rules published in 2000. We have over 24 years of experience operating a comprehensive child support enforcement program and our Children and Family Services Department is the largest in our Tribe. We pride ourselves on offering wrap-around services and offer all four of the Social Security opportunities in Title IV; Temporary Assistance for Needy Families, Child Welfare, Child Support and, Foster Care as well as other programs including our Elder's program, Vulnerable Adult, Vocational Rehabilitation, Maternal Home Visiting, WIC, and Youth services.

As one of the first fifteen Tribes to participate in the self-governance program, the Port Gamble S'Klallam Tribe has long exercised its sovereignty to maximize the impact of limited federal resources and address the unique needs of its people. The PL 102-477 Program provides a vital mechanism for our Tribe to deliver comprehensive education, workforce development, and supportive services to children and families by consolidating related federal programs into a single, coordinated budget. PGST has operated its PL 477 plan for more than fifteen years and continues to integrate funding from the Administration for Children and Families (ACF) and the Bureau of Indian Affairs (BIA) to support services that help children and families achieve and maintain self-sufficiency. Through this Program, we serve American Indian families living on the Port Gamble S'Klallam Reservation or Trust Lands, as well as enrolled Port Gamble S'Klallam Tribal members residing in Kitsap County. However, the funding we receive is limited, and resources for the 477 Program are increasingly strained as community needs grow and federal program requirements continue to expand.

On January 15, 2026, the PGST Child Support Program participated in the Office of Child Support Enforcement (OCSE) Tribal Consultation in a listening-only capacity. We respectfully submit our written comment here.

Port Gamble S'Klallam Tribal Perspective

The Port Gamble S'Klallam Tribe recognizes that all parents have a responsibility to care for their children, bond with them, keep them safe and provide for all their basic needs. The Child Support Program takes a holistic approach to achieving those goals that takes into consideration the circumstances, strengths and goals of each family. We aim to work with both custodial and non-custodial parents to help them successfully meet their children's needs. To that end, we endorse innovative solutions that address the root causes of any individual parent's inability to consistently support his or her children, financially or otherwise.

Although we utilize some of the more standard enforcement mechanisms to encourage regular child support payments, we have found that our parents, and consequently their children, benefit most when we are able to provide individually tailored services designed to support long term success, especially in the areas of securing and maintaining employment opportunities.

PGST is located in rural Kitsap County on the west side of Puget Sound. With no county public transit on the Reservation, access to external resources is limited for those without personal vehicles. The closest urban area is Silverdale, WA (population 21,046)–approximately 21 miles away. Public transportation is infrequent and often indirect, increasing both the time and the expense.

Our tribal community experiences an unemployment rate of 7.9% and the poverty rate for families living on the Reservation is 13.7% - over twice as high as the state and county rates. Further, our community members have lower educational attainment rates than average in the surrounding community. Thirteen percent of those who reside on the reservation have less than a high school degree, compared with only 5% of Kitsap County residents. Just 9% of our residents have a bachelor's degree or higher, whereas 35% of Kitsap County residents have earned college degrees. Additionally, according to the most recent data available from the "My Tribal Area" site from the C.S. Census Bureau, nearly 15% of the sample size for the Port Gamble S'Klallam Reservation (532 respondents) reported having a disability.

In essence, our tribal members are competing for jobs with people who have more education, more reliable access to personal transportation, require less disability accommodations and are less likely to be experiencing the stressors of poverty. For those reasons, helping non-custodial parents secure and maintain employment opportunities through job search assistance, skills assessments, job readiness training, job placement services, and job retention services, is an essential component of our child support program. These are the very services the Rule was designed to permit.

Serving noncustodial parents who are unemployed or underemployed opens critical doors and pathways, especially for non-Tribal noncustodial parents who often have limited access to supportive services through the Tribe. However, there is a significant gap in services when more than half of our noncustodial parents (54%) are unable to access the Tribe's employment programs because they are either non-Tribal or enrolled in another Tribe. Due to the limitations of our 477 Program, we cannot offer employment services to these parents, even though these supports are specifically designed to stabilize families, increase economic security, and improve child support outcomes. As a result, a substantial portion of the population we are expected to engage is left without access to the very services that could help them achieve stability and meet their obligations.

Recission of Employment and Training Services for Noncustodial Parents in Child Support The Port Gamble S'Klallam Tribe strongly disagrees with OCSE's decision to rescind the final rules for Employment and Training Services for Noncustodial Parents in Child Support, which were adopted on January 11, 2025. We urge OCSE to consider the significant barriers faced by our community members, including high unemployment and low-income levels, limited access to public transportation, lower educational attainment, and the prevalence of disabilities among our Tribal members. These factors make employment and training services through our child support program not only beneficial but essential to the well-being and self-sufficiency of the families we serve.

The goal of rooting out redundant and cost-inefficient government programs is a worthy one, however, the Rule is neither. The final rule was thoughtfully designed to include safeguards that prevent the provision of duplicative services and require child support programs to demonstrate that the need being met is not one served by other tribally administered programs. The Rule requires coordination, consultation and ongoing assessments of programs. And there are requirements in place designed to ensure the noncustodial parents being served are those who are truly in need of employment assistance. We believe the structure and guidelines imposed by the rule are sufficient to ensure both efficiency and effectiveness.

As OCSE's own examination of the research shows, reliable child support depends on the economic stability of noncustodial parents and "providing employment and training services for noncustodial parents can lead to more reliable and regular child support payments." Study after study has demonstrated this same outcome. According to the OCSE, a number of both national and state-based assessments have collectively demonstrated that these program result in 'positive outcomes in employment rates, earning, child support payments rates, the amount of child support paid and payment regularity."

OCSE's own grants under the Child Support National Parent Employment Demonstration ("CSPED") found that the benefits of CSPED outweighed its costs within just two years of

implementation. As OCSE concluded, providing Federal Financial participation under Title IV-D for employment and training services improves the effectiveness of a child support program. We have found the same to be true.

At this time of heightened economic insecurity, it is vital that tribal child support programs maintain flexibility in designing supports that work for our communities to address the root causes of child support payment lapses and inconsistencies. Not only do employment support services for noncustodial parents result in demonstrable increases in payment of monthly support obligations, we also found that they tend to strengthen family engagement, and lower enforcement-related costs associated with additional court hearings, debt collections and potential incarceration. Staff can devote more time to providing supportive services and connecting families with resources, ultimately saving money and improving outcomes. These regulations also help shift how child support is perceived by focusing on support and opportunity rather than punishment. In sum, our program is more effective, as measured by both tangible and intangible metrics, as a result of the option to offer employment support services to noncustodial parents directly.

Rescinding this Rule would be shortsighted and counterproductive to the federal government's stated goals of increasing and sustaining noncustodial parents' financial responsibility for their children and would disproportionally harm tribal communities by removing critical flexibility within tribal child support programs. When Tribes receive funding to support unemployed and underemployed noncustodial parents (NCPs), they are able to address barriers to employment in a culturally grounded and effective way. We excel at combining resources, filling service gaps, and providing holistic, non-duplicative services. These regulations add essential supports that enhance -- not replace -- the services already offered through Tribal programs. We urge the Office of Child Support Enforcement to reevaluate this determination and reinstate this promising program.

We look forward to further consultation and government to government discussions with OCSE on these important policy issues. If you have further questions, please contact the Port Gamble S'Klallam Children and Families Assistant Director, Maria Huynh by phone at (360) 297-9668 or by email at mtran@pgst.nsn.us.

Sincerely,
Amber Caldera, Chairwoman
Port Gamble S'Klallam Tribe

Sisseton-W**ahpeton Oyate**:
I am writing this letter as the Chairman of the Sisseton-Wahpeton Oyate of the Lake Traverse Reservation (SWO) on behalf of our tribe and our SWO Child Support Enforcement

(SWOCSE) program. Thank you for the opportunity to provide testimony. We strongly oppose the recission of the final rule to Employment and Training Services for Non-custodial Parents in the Child Support Program and respectfully request the continued support of the Office of Child Support Enforcement to retain the final rule.

Our child support program became a comprehensive IV-D program in 2002. Our focus has been and continues to be to collect and disburse child support dollars to our families. Providing employment training services to the non-custodial parents would provide opportunities for their employment, which would result in more dollars being collected and disbursed to families. This recission would limit the services the department can offer.

The Sisseton-Wahpeton Oyate has over 14,000 members. We have limited employment opportunities for our members as is the case with most tribes, although we attempt to employ as many members as possible. SWOCSE coordinates with other programs and directs both custodial and non-custodial parents to other services available to them to assist them with their needs whenever possible. The Employment and Training Services for Non-custodial Parents would not be duplicative because it would be designed specifically for this demographic. It would benefit the children and the non-custodial parents. Our tribe fully opposes the recission of this program and supports the retention of the final rule.

Other points to consider:

- It is our belief that recission of the final rule will hurt our children and families through failure to provide positive opportunities to non-custodial parents which results in lower collections and disbursements.
- Providing these services to non-custodial parents will also result in reduced arrears.
- The paradigm in dealing with non-custodial parents has been mainly punitive. The Employment and Training Services for Non-custodial Parents could result in a system that assists the non-custodial parents rather than punishes them for their inability to obtain gainful employment.
- Other employment training funds are limited and cannot provide services to all non-custodial parents who would benefit from these types of services.

In closing, the Sisseton-Wahpeton Oyate is in full support of retaining the final rule and continued support of the Employment and Training Services for Non-custodial Parents. Please contact me should you need any further information.

Sincerely,
J Garrett Renville,
SWO Tribal Chairman

Standing Rock Sioux Tribe:
I am the chairman of the Standing Rock Sioux Tribe, whose reservation straddles a portion of south central North Dakota and north central South Dakota. I welcome the opportunity to provide information relevant to the rescission of the Employment and Training Services for Noncustodial Parents in the Child Support Program final rule.

Our reservation is extremely rural and remote from larger towns or cities. We have an enrollment of over sixteen thousand (16,000) with approximately one-half of our members living on the Standing Rock Reservation. The unemployment rate on the Standing Rock Sioux Reservation by most accounts is over fifty per cent (50%). There are too few jobs and too many barriers to employment such as transportation, housing instability, high dropout rates and substance abuse. Obviously, "job search assistance; job readiness training, job development and job placement services; skills assessment; job retention services; work supports; and occupational training and other skills training directly relating to employment" are needed for our reservation population as a whole, but even more so for our members who have children to support.

While our Child Support Enforcement Agency has not applied to use FFP pursuant to this final rule to develop and implement employment training services to noncustodial parents, to have an option to do so is something that we urge you to continue to make available. Examples of successes in other tribal child support programs, such as the Fort Belknap Indian Community's Child Support Program, are encouraging. Pulling funding for Employment and Training Services for Noncustodial Parents in the Child Support Program after resources have been used to develop a job program seems penny wise and dollar foolish and not cost effective.

While there are other job service programs available on our reservation, they may not be open to everyone, and one centered solely on noncustodial parents may prove invaluable. For most of our noncustodial parents, the stakes in becoming and remaining unemployed are even higher than for other workers. Noncustodial parents generally want to support their children, and in many cases, their inability to do so interferes with their relationship with their children. Additionally, noncustodial parent who are not supporting their children face consequences not all unemployed persons do, such as driver license suspension, hunting and fishing license suspension, professional license suspension, liens on personal or real property, reporting to credit bureaus, and possibly even incarceration or referral for federal prosecution.

Thank you for your consideration of my input as to the importance of the retention of the Employment and Training Services for Noncustodial Parents in the Child Support Program final rule.

Respectfully,
Steven Sitting Bear
Standing Rock Sioux Tribe Chairman

White Earth Reservation Business Committee:
Thank you for the opportunity to provide written testimony on behalf of the White Earth Nation and the White Earth Nation Child Support Program.

This testimony is written in support to urge the Office of Child Support Enforcement (OCSE), to retain final rule and continue to support employment and training services provided to non-custodial parents participating in the child support program.

Employment and training services play a critical role in assisting non-custodial parents to achieve stable employment, improve job readiness, and increase earning capacity. These services directly contribute to consistent child support payments, enhance financial stability, and improved outcomes for children and families.

When parents have access to employment support, it ensures that non-custodial parents receive the necessary guidance, skills development, and employment opportunities required to successfully transition into sustainable employment.

In addition, increases child support performance, reduces arrears, enforcement costs, and long-term system involvement which aligns with federal efficiency and fiscal responsibility. Without employment support, systems rely more heavily on punitive enforcement, which is more expensive and less effective.

Non-custodial parents, fathers, and parents with justice system involvement who are engaged in the child support program are often not connected to traditional workforce programs. Removing these employment services does not redirect participants/ parents to other systems; instead, it removes support entirely.

In many Tribal and rural areas, workforce systems are fragmented, underfunded, or inaccessible, child support-based employment services often function as the only entry point for parents in many communities. The impact of these services will fall not only upon the NCP's but also on children, parents, families and Tribal communities.

By addressing these barriers and breaking down the walls to employment and providing structured workforce support. It can reduce reliance on enforcement actions alone and instead promote self-sufficiency responsible parenthood, positive engagement with child support and compliance with child support obligations.

I respectively ask the Office of Child Support Enforcement to retain the final rule and continue supporting employment and training services with the child support program. Rescinding the rule would disproportionately harm Tribal communities by removing flexibility we rely on.

These services honor Tribal sovereignty, strengthen families, and create pathways to long-term stability and align with the Office of Child Support Enforcement's mission to ensure the well-being of children while encouraging parents' ability to meet their support responsibilities.

Thank you for your time and consideration,
Michael Fairbanks, Chairman
White Earth Reservation Business Committee