



September 4, 2025

Joseph Bock  
Acting Associate Commissioner  
Children's Bureau  
Administration on Children, Youth, and Families  
3rd Floor, Mailstop 3602  
330 C Street, SW  
Washington, DC 20201

Re: Providing Technical Assistance Related to the Indian Child Welfare Act (90 FR 34506, 2025-13790, pages 34506-34509)

The Wisconsin Department of Children and Families (DCF) welcomes the opportunity to provide comments on the above referenced Request for Public Comment regarding the removal of undue burdens related to meeting the requirements of title IV-B of the Social Security Act.

**DCF Responses to Specific Questions for Comment:**

- II. *Reducing Administrative Burden.* As Stated above, Public Law 118-258 requires that HHS reduce the administrative burden for administering the title IV-B program, and it allows HHS to modify any title IV-B reporting requirement for Tribes whose allotment under title IV-B, subpart 1 is less than \$50,000 for a FY.
- c) Currently, information on the Child Abuse and Prevention Treatment Act (CAPTA) and the Chafee program are reported on the CFSP, APSR, and CFS-101 to ensure consistent reporting across these programs. Does your State/Tribe believe that continuing to combine these requirements into an integrated plan is the least burdensome way to administer and report on administering the title IV-B, Chafee, and CAPTA programs? Would it be more efficient to require that agencies submit a stand-alone application/report separately for each program? Does your State/Tribe have input on changes that would better ensure consistency across fiscal reporting for these programs? We also appreciate comments on what streamlined reporting may look like.

**DCF Response:** Wisconsin believes that continuing to combine these requirements into an integrated plan is the least burdensome approach. Integration promotes internal program coordination, consistency, and collaboration, streamlines state-level review processes, and reduces the risk of late submissions.

- d) Currently, Tribes that submit a CFSP have the option to use a preprint template (see Attachment H to ACF-ACYF-CB-PI-24-03). States do not use a template. Does your State/Tribe believe that a template format for a streamlined CFSP/APSR would be helpful? If so, how?

**DCF Response:** Wisconsin does not believe a template format would be beneficial for Wisconsin and requests that, if created, it mirrors the current tribal process and remains optional. Wisconsin's current CFSP/APSR adheres to state-level branding standards and is aesthetically tailored to the unique needs of the external partners involved in ongoing collaboration.

- e) Does your State/Tribe have suggestions for improvements to the CFS-101 that would be less burden on your agency and improve fiscal reporting consistent with standards and guidelines for other Federal formula grant programs?

**DCF Response:** The CFS-101 Part II requires states to provide annual estimated expenditures for Child and Family Services funds. The compilation of category estimates under columns G (*Title IV-E*) and H (*State, Local, Tribal, & Donated Funds*) involves multiple state-level system reports and takes approximately eight hours. Wisconsin believes that much of this information collection is redundant with other existing federal reporting, such as the CB-496. As an alternative, Wisconsin suggests states only provide a grand total and high-level summary regarding title IV-E and state/local funding usage in the CFSP/APSR narrative.

Wisconsin thanks ACF for collecting input prior to the issuance of the new program requirements in the Supporting America's Children and Families Act, Public Law 118-258.

Sincerely,



John Elliott  
Administrator, Division of Safety and Permanence  
Wisconsin Department of Children & Families