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June 19th, 2023

Office of Child Support Services

Attention: Director of Policy and Training
30 C Street SW, Washington, DC 20201

Online: <https://www.regulations.gov/document/ACF-2023-0002-0001>

Re: Comments–Notice of Proposed Rulemaking (“NPRM”) Elimination of the Tribal Non-Federal Share Requirement. ***RIN 0970-AC99***

The Eastern Regional Interstate Child Support Association (ERICSA) is a not-for-profit organization of child support professionals that was founded in 1963 and promotes the interests of children who are owed child support. ERICSA members work for or with state, tribal, and local child support agencies as public or private sector participants. ERICSA’s membership spans the United States. This letter of support is being sent as part of ERICSA’s participation in a national discussion regarding intergovernmental issues arising in the establishment and enforcement of child support obligations.

We fully support Office of Child Support Services (“OCSS”) proposal to eliminate the non-Federal share for Tribal child support enforcement programs. We have no objections to OCSS removing previous language or reorganizing sections of 45 CFR parts 309 and 310 due to eliminating the non-Federal share for Tribes.

The tribal non-Federal share requirements currently limit growth, causes disruption, and creates financial instability, among tribes who already have limited resources. Eliminating the Tribal Non-Federal share will ensure continuation of quality services for Tribal children and to allow additional Tribal communities to begin new Tribal IV-D programs. With 574 Federally recognized Tribes and only 60 currently receiving direct funding for IV-D programs, it's imperative to remove any hardships with funding to ensure that Tribal communities receive the resources that they need to support children and families.

We commend and applaud the Administration for Children and Families for supporting tribes to help lift tribal families out of poverty. Thank you for the opportunity to submit comments on the NPRM to eliminate the tribal non-Federal share. If you have further questions, please contact Lisa Skenandore at lisa.skenandore@smimail.net.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Skenandore".

Lisa Skenandore
ERICSA President