



**NATIONAL TRIBAL**   
**CHILD WELFARE CENTER**  
**FOR INNOVATION AND ADVANCEMENT**

# Unlocking Opportunities Under Title IV-E: The Pathways for Tribal Child Welfare Systems



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# Understanding the Pathways for Title IV-E Funding

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# Session Objectives

## Understanding the Pathways for Title IV-E Funding



Provide a deeper exploration of the various pathways available to Tribal child welfare programs to access title IV-E funding, including:

- Direct title IV-E plan approval
- Tribal–State agreements
- Tribal or State contracting options



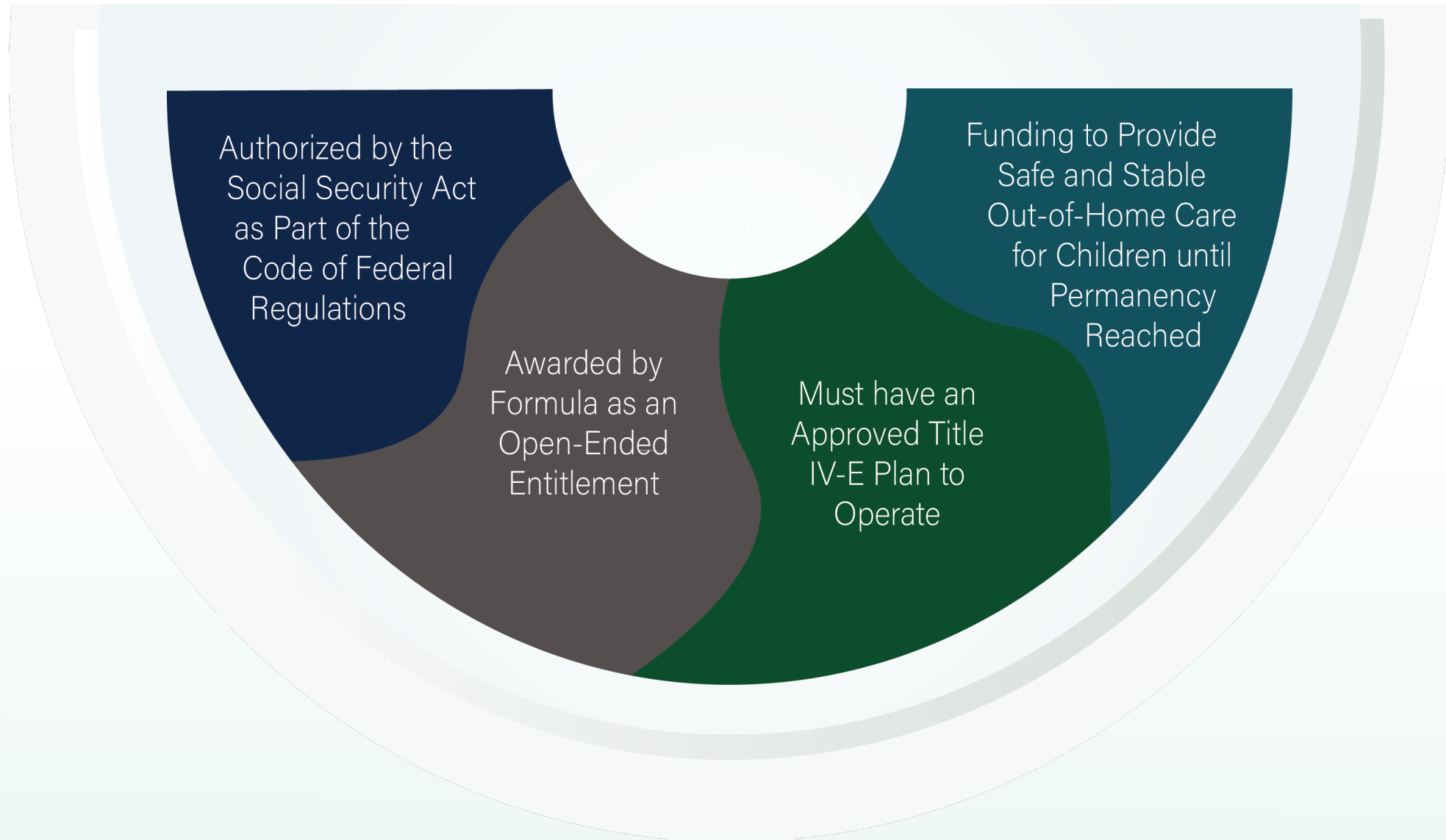
Clarify the requirements, benefits, and considerations of each pathway



Support informed Tribal decision making about how to pursue title IV-E

# What is Title IV-E?

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# Title IV-E

## Allowable Expenses



Daily Care and Supervision of Eligible Children



Administrative Costs



Training of Staff and Foster Care Providers



Recruitment of Foster Parents



Creation and Maintenance of Data Collection Systems

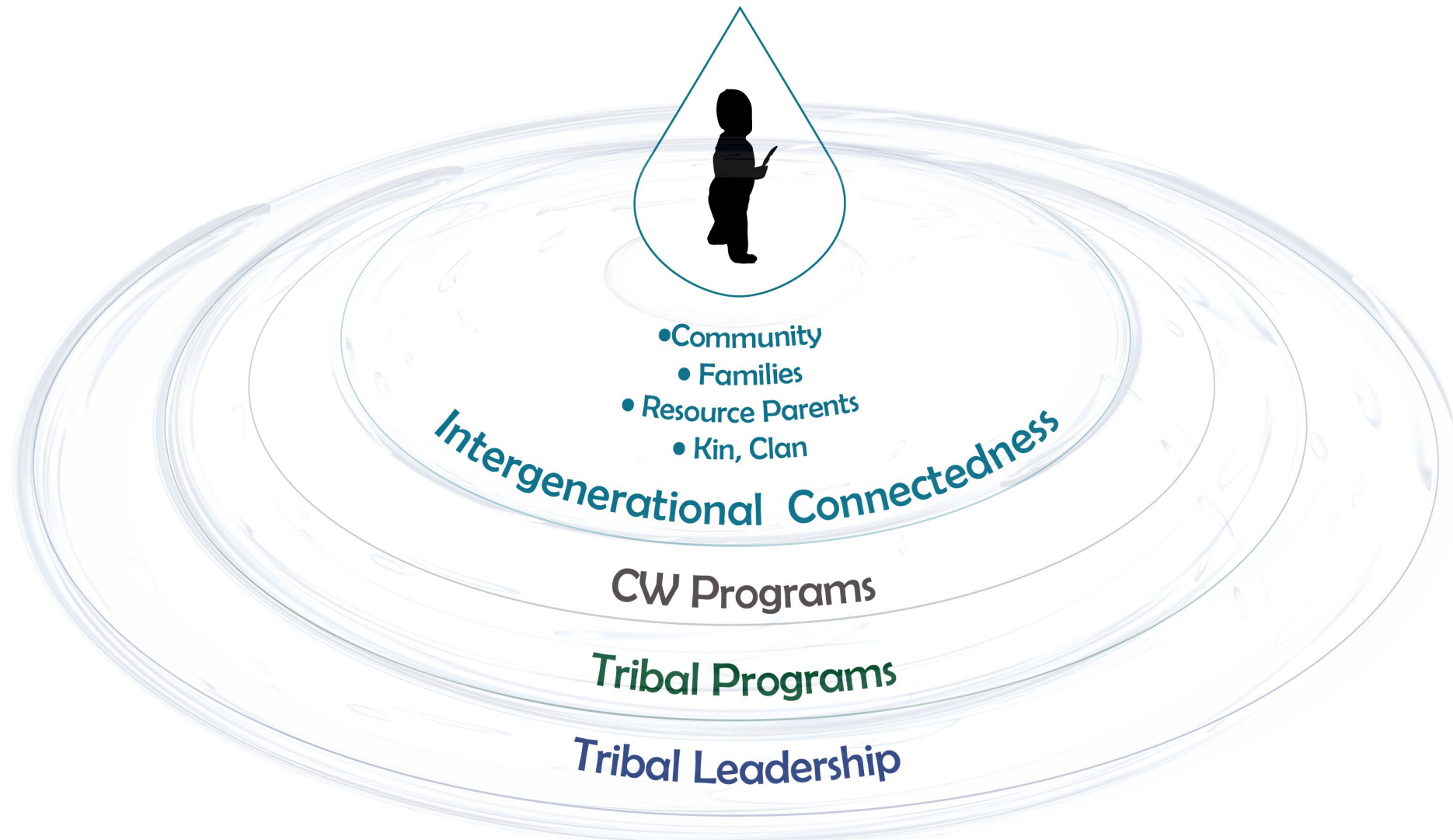
# NTCWCIA Resource

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# Title IV-E as Part of Community

*Designing Title IV-E to Meet the Needs of Your Tribal Nation*



# Pathways to Title IV-E Funding



**Direct  
Title IV-E**



**Tribal–State  
Agreement**

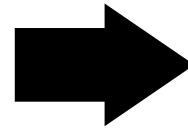


**Tribal or  
State  
Contracting**

# Direct Title IV-E

**DIRECT**

Federal



Tribal  
Nation

# Direct Title IV-E



Fostering Connections to Success and Increasing Adoptions Act of 2007 (P.L. 110-351) provides Indian Tribes, Indian Tribal Organizations and Consortia (Indian Tribes) the opportunity to become a Direct title IV-E agency.



Tribes must operate a title IV-B, subpart 1 program to be eligible for Direct title IV-E.



Tribes must submit a plan pre-print for approval through the Administration for Children and Families (ACF) to operate a title IV-E foster care, guardianship (optional), and adoption assistance programs.



Tribes claim reimbursement for all allowable title IV-E expenses and are responsible for providing match for all maintenance assistance payments.

# Direct Title IV-E

## Direct title IV-E can potentially be a good choice for Tribes:

- Who operate a child protective service (CPS) program
- Who have a child welfare program and take placement care and responsibility of Tribal children in their service area
- Who have a Tribal Court in place that will handle child welfare issues
- Who are interested in developing a direct title IV-E program but need time to develop Tribal infrastructure
- Who are recruiting, training, and licensing foster homes
- Tribes with established administrative capacity who want direct federal partnership

# Direct Title IV-E - Readiness

## Tribal Readiness Assessment Tool for the Title IV-E Program



### PART B | Services - Family Preservation, Family Support, Promoting Safe and Stable Families, Domestic Violence, etc.

A Title IV-E agency must have a service program designed to help children in foster care return home safely. The following questions address the types of services the tribe has in place or will develop.

| Service/Program  | Yes                      | No                       | If YES, please provide description of what services/programs the tribe currently offers to families from each Service/Program category.<br>If NO, please explain the tribe's plan to develop this in the next few years. |
|--|--------------------------|--------------------------|--|
| Does the tribe currently operate a Title IV-B-1 program?                         | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Does the tribe have case planning and case management services?                  | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Does the tribe offer family strengthening and/or education and support services? | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Does the tribe offer intensive in-home services?                                 | <input type="checkbox"/> | <input type="checkbox"/> |  |

# Direct Title IV-E - Readiness

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## Assessment Considerations:

### Program & Continuum

- Scope of program
- Child welfare continuum
- CPS (Child Protective Services)

### Services

- Family preservation
- Family support
- Preserving safe and stable families

### Legal & Oversight

- Legal/judicial processes & case review

### Workforce & Placement

- Staffing
- Foster home recruitment & licensing

### Collaboration

- Collaborations and partnerships

### Data & Systems

- Data collection & IT

### Financial

- Financial controls

# Tribal-State Agreements



# Tribal-State Agreements

## (Intergovernmental Agreements)

| Legal Authority and Program Status  | Who is the “IV-E Agency” for Federal Purposes   | Responsibility for Compliance and Risk  | Pathway Implications  | Bottom Line  |
|---|---|---|---|--|
| <ul style="list-style-type: none"> <li>• The Tribe is effectively operating a title IV-E program (even if not fully direct-funded).</li> <li>• Authorized under federal statute (SSA §479B) and Indian Child Welfare Act.</li> <li>• The Tribe assumes responsibility for administering IV-E on behalf of eligible children under the agreement.</li> </ul> | <ul style="list-style-type: none"> <li>• The Tribe functions in a quasi-IV-E agency role for the populations covered.</li> <li>• The agreement delineates which entity (state vs. Tribe) performs core IV-E functions (eligibility, case planning, licensing, etc.).</li> </ul> | <ul style="list-style-type: none"> <li>• Compliance responsibilities are shared and explicitly allocated.</li> <li>• Tribes often take on responsibility for:               <ul style="list-style-type: none"> <li>➢ Eligibility determinations (in some agreements)</li> <li>➢ Case planning and reviews</li> <li>➢ Licensing standards (Tribal or state, depending on terms)</li> </ul> </li> </ul> <p>Federal audit exposure can extend to Tribal operations via the state’s claims.</p> | <ul style="list-style-type: none"> <li>• Often seen as a stepping stone to direct title IV-E plan approval.</li> <li>• Builds administrative capacity for independent operation.</li> </ul> | <ul style="list-style-type: none"> <li>• An IV-E agreement is a program-level partnership with shared administration and pass-through federal funding tied to IV-E eligibility.</li> </ul> |

# Tribal-State Agreements

## (Intergovernmental Agreements)

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Tribal-State Agreements vary by Tribe and State

They generally provide for the pass-through of title IV-E funding for:

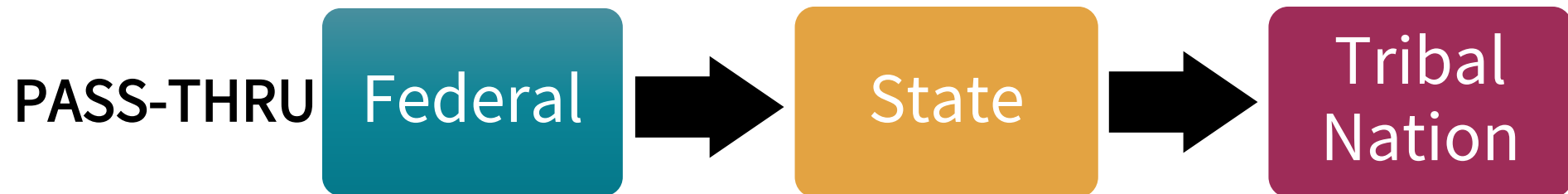
- Foster Care, Adoption, Guardianship maintenance assistance payments
- Administrative Costs
- Training Costs
- Prevention services through the Families First Prevention Services Act (FFPSA)

# Tribal-State Agreements (Intergovernmental Agreements)

## IV-E Agreements are a good fit for Tribes that want or have:

- Intent to operate a title IV-E program (or move toward direct IV-E plan approval)
- Administrative infrastructure to handle eligibility, case planning, and documentation requirements
- Desire for greater sovereignty and control over child welfare practice, including culturally aligned standards
- Established or developing data and fiscal systems to support IV-E claiming and reporting
- Capacity to share compliance responsibility and manage audit risk tied to federal funds
- Interest in building long-term program capacity, not just delivering services

# Tribal-State Contracts



# Tribal-State Contracts

| Legal Authority and Program Status   | Who is the “IV-E Agency” for Federal Purposes   | Responsibility for Compliance and Risk   | Pathway Implications   | Bottom Line   |
|--|---|--|--|---|
| <ul style="list-style-type: none"> <li>•The Tribe is not operating the IV-E program.</li> <li>•The state remains the sole IV-E agency and retains all legal authority.</li> <li>•The contract is simply a procurement mechanism for services.</li> </ul> | <ul style="list-style-type: none"> <li>•The state is unequivocally the IV-E agency.</li> <li>•The Tribe is a vendor/service provider, even if delivering casework or placement services.</li> </ul> | <ul style="list-style-type: none"> <li>•The state bears full compliance responsibility to ACF.</li> <li>•The Tribe must meet contract requirements, but federal IV-E compliance risk sits with the state.</li> <li>•Less direct federal accountability for the Tribe.</li> </ul> | <ul style="list-style-type: none"> <li>•Does not build IV-E program infrastructure in the same way.</li> <li>•More transactional, less developmental.</li> </ul> | <ul style="list-style-type: none"> <li>•A contract is a service-level arrangement where the state retains the IV-E program and simply purchases services from the Tribe.</li> </ul> |

# Tribal-State Contracts



Tribal-State Contracts are individualized and unique to each State and Tribe

- The Tribe is authorized to perform responsibilities specific to their contracted activities only
- Reimbursed costs are explicitly stated in the contract
- Typically bound by procurement rules

# Tribal-State Contracts

## IV-E Contracts are a good fit for Tribes that want or have:

- Interest in providing child welfare services without taking on full IV-E program administration
- Limited administrative or fiscal infrastructure for federal claiming and compliance
- Preference for the state to retain IV-E authority and risk
- Need for a simpler, more flexible funding arrangement (e.g., fee-for-service or cost-based payments)
- Focus on specific service areas (case management, placements, recruitment) rather than full program operation
- Short- to medium-term engagement rather than building a standalone IV-E program

# Title IV-E Tribal-State Agreement

# V. Tribal-State Contract

## COMPARISON

### SCOPE & STRUCTURE

#### Tribal-State Agreement (IV-E Pass-Through)

Broad, system-level framework that can include foster care maintenance, adoption assistance, guardianship assistance, and allowable administrative costs. Structured as a government-to-government or intergovernmental agreement.

#### Tribal-State Contract (Vendor-Based)

Narrow, service-specific arrangement. Typically structured as a procurement or vendor contract for defined services (e.g., foster home placement, case management support).

### SOVEREIGNTY & AUTHORITY

Explicitly acknowledges Tribal sovereignty. More likely to support Tribal court jurisdiction, Tribal decision-making authority, and culturally grounded service delivery systems.

Often reflects a vendor-client relationship. Limited recognition of Tribal sovereignty; authority typically remains with the state, including key child welfare decisions.

### FUNDING MECHANISM

Pass-through of federal title IV-E funds from the state to the Tribe for eligible children and allowable administrative activities. Funding aligns with IV-E claiming structure (maintenance + admin).

Payment for specific services rendered. May include flat rates, per diem, or reimbursement for limited administrative functions. Does not typically mirror full IV-E claiming structure.

# Title IV-E Tribal-State Agreement v. Tribal-State Contract

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## COMPARISON

### PURPOSE & INTENT

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#### Tribal-State Agreement (IV-E Pass-Through / IGA)

Designed to support Tribal administration (or near-administration) of title IV-E programs and strengthen Tribal child welfare systems. Often a pathway toward Direct Title IV-E.

#### Tribal-State Contract (Vendor-Based)

Designed to support state system needs by purchasing services from the Tribe. Focused on collaboration within a state-controlled framework rather than Tribal system building.

### CONTROL OF PROGRAM DESIGN

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Tribe has greater influence over policy, procedures, and service delivery design, including integration of culture, ICWA practice, and community priorities.

Program design largely dictated by state requirements, contract terms, and service specifications. Limited flexibility for Tribal adaptation.

### ADMINISTRATIVE COST CLAIMING

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Allows for broader claiming of allowable administrative costs (e.g., case management, eligibility, training, data systems) tied to IV-E requirements.

Administrative reimbursement is typically limited to what is explicitly included in the contract; often excludes full IV-E administrative claiming categories.

# Title IV-E Tribal-State Agreement v. Tribal-State Contract

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## COMPARISON

### RELATIONSHIP TYPE

#### Tribal-State Agreement (IV-E Pass-Through / IGA)

#### Tribal-State Contract (Vendor-Based)

Government-to-government partnership grounded in intergovernmental collaboration and shared responsibility.

Vendor-purchaser relationship based on service delivery expectations and performance metrics.

### LONG-TERM STRATEGIC VALUE

Builds infrastructure, workforce, and systems needed for Tribal self-determination and potential Direct title IV-E implementation.

Provides short-term funding for services but does not typically build full Tribal IV-E infrastructure or long-term system capacity.

### FLEXIBILITY & ADAPTATION

Greater flexibility to evolve over time, amend terms, and align with Tribal priorities and federal changes.

Less flexible; bound by procurement rules, contract terms, and state-defined deliverables.

# Pathways to Title IV-E Funding



**Direct  
Title IV-E**



**Tribal-State  
Agreement**



**Tribal or  
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# Questions? We'd Love to Hear from You

Please share your questions or reflections in the chat.



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**[ntcwcia.org](http://ntcwcia.org)**

## Contact Us

### Connect with the Center

The National Tribal Child Welfare Center for Innovation and Advancement welcomes inquiries from Tribal child welfare programs, partners, and collaborators. Whether a program is ready to request technical assistance or simply wants to stay connected, the Center is here to help.

### Request Technical Assistance

Eligible title IV-B Tribal child welfare programs interested in receiving technical assistance can submit a request using the form below. A member of the Center's team will respond within **two business days** to schedule an initial meeting and begin the partnership process.



**Contact Form**



# Title IV-E Virtual Summit



May 13<sup>th</sup> and 14<sup>th</sup>, 2026

12 PM–5 PM ET | 11 AM–4 PM CT | 10 AM–3 PM MT |  
9 AM–2 PM PT | 8 AM–1 PM AKT

Join us for our 2-Day Virtual title IV-E Summit, designed for peer connection, shared learning, and practical strategies. Open to Tribal child welfare programs exploring title IV-E pathways and options.

## Together, we will :

- Engage in meaningful conversations
- Exchange knowledge grounded in community experiences
- Explore approaches that strengthen capacity and support positive outcomes

## Participants will have the opportunity to:

- Learn from one another
- Reflect on emerging strategies
- Identify pathways that align with their community priorities and values





**Virtual Live Session**

# Ask the Experts

**June 3, 2026**

An opportunity to ask your specific questions and connect with Tribal program colleagues who have accessed funding from each of the title IV-E pathways, as well as federal experts.

**Registration and details coming soon.**



# We Value Your Feedback



Scan the QR code to complete our short survey.

<https://s.zoom.us/j/91987654321>