



T OF CHILD SERVICES

Call 800-800-5556 to report suspected Child Abuse or Neglect.

Mike Braun,
Governor |
Jennifer
Dorfmeier,
Director

**INDI
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DEP
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MEN**

May 15, 2026

To: infocollection@acf.hhs.gov

RE: Proposed Information Collection Activity; Adoption and Foster Care Analysis and Reporting System (AFCARS)

In review of the Proposed Information Collection Activity that was entered as a published document [2026-06093](#) (91 FR 15622) on March 30, 2026, the Indiana Department of Child Services (DCS) respectfully submits public comments on the following:

- (a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility;
 - For larger tribal populations within states, the proposed collection as written could have practical utility and could assist with standardizing the court and permanency processes regarding ICWA youth. However, due to the Indiana Department of Child Services' (DCS) percentage of tribal members in the AFCARS population being consistently less than 0.5%, it is more cost and time efficient to utilize our existing Focused Needs Team in their current ICWA oversight processes.
- (b) the accuracy of the agency's estimate of the burden of the proposed collection of information;
 - The increase of burden appears accurate for Indiana as we have a low percentage of ICWA youth but would need additional staff to oversee initial and ongoing implementation as well as increased data collection.
- (c) the quality, utility, and clarity of the information to be collected.
 - Due to technical bulletins not yet released for the ICWA updates, only an initial review of the modifications and additions to DCS'

current case management information system has been completed.

- i. Based on this review and the fact that DCS has a low percentage of ICWA youth, there are concerns that the interpretation of the questions to be answered by field staff will vary. Data quality reviews would need to take place regularly to ensure correct data entry, increasing the need for oversight.

Thank you for the opportunity to offer comments on this activity. Should any questions arise, DCS will be able to provide clarification.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Delaney, LCSW". The signature is written in a cursive, flowing style.

Director, Indiana Department of Child Services