

ASSOCIATION OF VILLAGE COUNCIL PRESIDENTS

Thaddeus Tikiun Jr., Chairperson | Vivian Korhuis, CEO | AVCP.org



Administration

101 A Main St., PO Box 219, Bethel, AK 99559 | T 907.543.7300

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Children's Bureau
Administration for Children and Families
U.S. Department of Health and Human Services
330 C Street, SW
Washington, DC 20201

Transmitted via email to infocollection@acf.hhs.gov

RE: Proposed Information Collection Activity—Adoption and Foster Care Analysis and Reporting System (91 FR 15622) Published March 30, 2026, in the Federal Register.

Dear Information Collection Clearance Officer,

The Association of Village Council Presidents (AVCP) is a regional Tribal non-profit consortium based in Bethel, Alaska, serving 56 federally recognized Tribes within 48 communities throughout the Yukon-Kuskokwim Delta. Our Tribes and their members live in one of the most remote regions of the United States, an area spanning dozens of primarily roadless communities.

AVCP appreciates the opportunity to provide comments regarding the proposed information collection activity related to the Adoption and Foster Care Analysis and Reporting System (AFCARS) data elements established under the December 2024 final rule.

Our region includes many remote Alaska Native communities that continue to experience longstanding challenges related to public safety, behavioral health, housing instability, family violence, intergenerational trauma, and limited access to services. These realities directly affect Alaska Native children and families involved in state child welfare systems.

Nunaput umyuallgutkut pinirluteng-llu, Tegganerput qigcikliki pirkakluki-llu, ayagyuaput-llu ciuliqagcimaut yuuyarakun. Our Tribes are united and strong, our Elders are respected and valued, and our youth are guided by Yuuyaraq.

Akiachak, Akiak, Alakanuk, Andreafski, Aniak, Atmaulluak, Bethel, Bill Moore's Sl., Chefornak, Chevak, Chuathbaluk, Chuloonawick, Crooked Creek, Eek, Emmonak, Georgetown, Goodnews Bay, Hamillon, Hooper Bay, Lower Kalskag, Upper Kalskag, Kasigluk, Kipnuk, Kongiganak, Kotlik, Kwethluk, Kwigillingok, Lime Village, Marshall, Mekoryuk, Mtn. Village, Napaimute, Napakiak, Napaskiak, Newtok, Nightmute, Nunakauyak, Nunam Iqua, Nunapitchuk, Ohogamiut, Oscarville, Paimiut, Pilot Station, Pitka's Point, Platinum, Quinhagak, Red Devil, Russian Mission, Scammon Bay, Sleetmute, St. Mary's, Stony River, Tuluksak, Tuntutuliak, Tununak, Umkumiut

For Alaska Native communities in the YK Delta, the Indian Child Welfare Act (ICWA) is a critical safeguard intended to preserve the connection between Native children, their families, their Tribes, their languages, and their communities. Historically, tribes have often lacked access to reliable and transparent data regarding how ICWA is implemented in practice. The inclusion of ICWA-related AFCARS data elements represents an important step toward improving accountability, collaboration, and outcomes for Native children.

The ICWA data elements established under the AFCARS 2024 final rule provide necessary and practical tools for understanding whether Native children are receiving the protections guaranteed under federal law. Accurate data collection regarding inquiry, notice, active efforts, placement preferences, and Tribal engagement can help identify systemic gaps and improve coordination between states and Tribes.

In remote regions such as the YK Delta, these data elements are especially important. Alaska Native children may be separated from their home communities by significant geographic distance, making the preservation of family and cultural connections even more critical. Tribal governments frequently play an essential role in identifying relatives, supporting placement options, assisting families, and maintaining cultural continuity for children involved in foster care proceedings. Better data can help ensure these efforts are recognized and strengthened.

Improved ICWA-related data collection may also help address longstanding barriers that Tribes face when attempting to advocate for resources, services, and policy improvements. Without accurate and accessible information, it is difficult for Tribal organizations, policymakers, and service providers to fully understand trends affecting Native children and families or evaluate whether systems are functioning as intended.

We also recognize concerns regarding administrative burden. However, we believe the burden of insufficient data has fallen disproportionately on Native children, families, and Tribes for decades. The lack of meaningful ICWA-related reporting has contributed to gaps and limited the ability of Tribes and agencies to develop informed solutions. In our view, the long-term benefits of improved data collection outweigh the additional reporting responsibilities associated with these data elements.

At the same time, implementation should recognize the realities facing Tribes and rural service providers. Continued technical assistance, training, and coordination between federal agencies, states, and Tribes will be important to ensure data collection efforts are effective, consistent, and not unnecessarily duplicative.

AVCP supports safeguarding the ICWA data elements established in AFCARS. Reliable and transparent data is necessary to improve outcomes for Native children, strengthen Tribal-state collaboration, and ensure greater accountability in child welfare systems serving Alaska Native communities.

Thank you for the opportunity to provide comments on this important issue.

Sincerely,

ASSOCIATION OF VILLAGE COUNCIL PRESIDENTS



Vivian Korthuis
Chief Executive Officer