

# **TANF State Plan Information Collection**

**OMB Information Collection Request  
0970 - 0145**

## **Supporting Statement Part A - Justification**

**05/2019**

Submitted By:  
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U.S. Department of Health and Human Services

## SUPPORTING STATEMENT A – JUSTIFICATION

### Summary

#### 1. Circumstances Making the Collection of Information Necessary

The TANF state plan is a mandatory submission to the Secretary of the Department of Health and Human Services by the state. It consists of an outline specifying how the state will administer and operate its TANF program and certain required certifications by the state's Chief Executive Officer.

Authority to require states to submit a TANF plan is contained in section 402 of the Social Security Act (42 USC 602), as amended by Pub. L. 104-193, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996. States are required to submit new plans periodically (i.e., within a 27-month period).

This is a revision to the prior TANF state plan information collection in place. As of June 28, 2013, all TANF jurisdictions (states, territories, and tribes) were required to submit their TANF plan renewals and amendments electronically to ACF attached to a standardized government form, SF-424M (OMB# 4040-0002).

#### 2. Purpose and Use of the Information Collection

As provided in the statute, the Secretary makes a determination whether or not each state plan is complete. Once a plan is determined complete, the state is eligible to receive a State Family Assistance Grant (SFAG). The state must also make the plan available to the public.

#### 3. Use of Improved Information Technology and Burden Reduction

In the past, ACF had allowed TANF jurisdictions (states, territories, and tribes) to submit their TANF plan renewals and amendments in both paper and electronic formats (via email). On June 28, 2013, ACF announced that recipients of mandatory grant programs would be required to submit TANF state plans electronically, entering the SF-424M form into its On-Line Data Collection (OLDC) system. On October 1, 2013, ACF's Office of Administration issued a Final Notice requiring the use of the ACF OLDC system for electronic submission of state and tribal plans (78 Federal Register pp. 60285-86).

#### 4. Efforts to Identify Duplication and Use of Similar Information

No formal efforts to identify duplication have been made. However, through extensive contacts with organizations such as: the American Public Human Services Association (APHSA), the National Governors Association (NGA), the Welfare Information Network (WIN), the Congressional Research Service, the Center for Law and Social Policy, etc.,

and individuals in both the private and public sectors, we have learned that no similar or duplicate information is available. There are organizations that collect selected pieces of state plan information at a selected point in time. However, those collections do not include all of the components of the state plan and any subsequent plan amendments.

5. Impact on Small Businesses or Other Small Entities

These requirements have no impact on small businesses or entities.

6. Consequences of Collecting the Information Less Frequently

SFAG's are payable to "eligible states." In order to remain "eligible" (i.e., continue to receive funding under TANF), a state needs to submit its TANF plan during the applicable 27-month period. A state's SFAG is not released until its TANF plan is determined complete.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Not applicable.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

The notice was published in the Federal Register on January 4, 2018 and may be found at 83 FR 530.

9. Explanation of Any Payment or Gift to Respondents

No payments and/or gifts will be provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

The information collected is not confidential.

11. Justification for Sensitive Questions

None of the information requested from state agencies is of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

Estimated Total Annual Burden Hours: 594

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
State TANF plan	18	1	30	540
Amendments	18	1	3	54

Estimated Total Annual Burden Hours: 594

The state TANF plan requirements for the 54 states (which includes three territories and the District of Columbia) will create a triennial burden with an average of 18 states responding annually. We estimate the annual burden to be an average of 30 hours per response, resulting in 540 burden hours for TANF plan submissions.

We also estimate that the triennial burden of plan amendments for the 54 states, with an average of 18 respondents annually spending approximately 3 hours per response, resulting in 54 burden hours for plan amendments.

Therefore, the estimated total annual burden hours for state TANF plans and amendments is 594 hours. While there is considerable variation among states, this estimate is based upon numerous conversations that we have had with state staff related to their experience with prior similar state plans and amendments.

The total annual staff cost of processing each triennial plan for all 54 TANF states is estimated to be \$29,700. This is based on the estimate that preparation will take 594 state staff-hours at an average cost of \$50 per hours (including overhead, fringe benefits, etc).

### 13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no direct monetary costs.

### 14. Annualized Cost to the Federal Government

The federal annual cost associated with Regional and Central Office staff reviewing and processing the state TANF plans is estimated to be \$29,700. This is based on the estimate that preparation will take 594 state-staff hours at an average cost of \$50 per hours (including overhead, fringe benefits, etc). The limited amount of photocopying of state plans and the limited use of the telephone for conference calls is already built into

our general administrative expense. This workload does not represent additional costs in those areas.

15. Explanation for Program Changes or Adjustments

The state TANF plan and amendments are completed triennially with an average of 36 states responding annually. The annual burden is estimated to average 30 hours per respondent for the state TANF plan, and an average of 3 hours per respondent for amendments; the total burden in annual hours will be 594 hours.

16. Plans for Tabulation and Publication and Project Time Schedule

Section 411 (b) of the Personal Responsibility and Work Opportunity Act of 1996 requires the Secretary to submit a report to Congress each year that includes characteristics of each state's TANF program. ACF uses that information that is in the state plan as an important source of the information used to compile certain sections of this report. Published reports are posted to our web site at <http://www.acf.hhs.gov/programs/ofa/>

The TANF Annual Report to Congress is due April 1.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Display of the OMB expiration date is not inappropriate.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement in Item 19 of Form OMB 83-I

**B. Statistical Methods (used for collection of information employing statistical methods)**

The information collection requirements outlined in this report do not employ the use of statistical methods.