

Guidance for Tribal Temporary Assistance for Needy Families (TANF)

**OMB Information Collection Request
0970 – 0157**

Supporting Statement Part A - Justification

June 2020

Submitted By:
Office of Family Assistance
Administration for Children and Families
U.S. Department of Health and Human Services

SUPPORTING STATEMENT A – JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

42 U.S.C. 612 (section 412 of the Social Security Act) requires each Indian tribe that elects to administer and operate a TANF program to submit a TANF Tribal plan. The Tribal plan is a mandatory statement submitted to the Secretary by the Indian tribe, which consists of an outline of how the Indian tribe's TANF program will be administered and operated. It is used by the Secretary to determine whether the plan is approvable and to determine that the Indian tribe is eligible to receive a TANF assistance grant. It is also made available to the public. Requirements for the content of the plan can be found in the Code of Federal Regulations at 45 CFR 286.70.

2. Purpose and Use of the Information Collection

The information has been used and will continue to be used to assist Tribes in obtaining approval of their Tribal TANF Plans so that they can operate a TANF program and serve their populations.

3. Use of Improved Information Technology and Burden Reduction

An Indian tribe may prepare the TANF Tribal plan in Microsoft Word or other Word processing software. Tribes are required to submit plans via the Online Data Collection system (OLDC). Interim drafts may be submitted via email to reduce the submittal burden. Reviewer comments are also provided to the tribe via email.

4. Efforts to Identify Duplication and Use of Similar Information

No similar or duplicate information is available.

5. Impact on Small Businesses or Other Small Entities

This collection of information does not impact small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

The Indian tribes will only be required to respond to this information collection once every three years. Without this information, TANF Tribal plans cannot be approved and therefore, Tribes would be unable to operate TANF programs and serve their populations.

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

This collection of information does not involve any special circumstances.

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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency’s intention to request an OMB review of this information collection activity. This notice was published on April 14, 2020, Volume 85, Number 72, page 20691, and provided a sixty-day period for public comment. We did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

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

10. Assurance of Confidentiality Provided to Respondents

This data collection does not constitute a Privacy Act System of Records and no assurance of confidentiality is needed.

11. Justification for Sensitive Questions

This data collection does not contain any questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Guidance for Tribal Temporary Assistance for Needy Families	75	1	68	5100	1700	\$35.62	\$60,544
Estimated Annual Burden Total:					1700	Estimated Annual Cost Total:	\$60,544

The Respondents are continuing Tribal TANF Programs or those who are applying to become Tribal TANF programs. As tribal plans come up for renewal every three years, approximately one third of program renew their TFAPs every year. The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2019 which is \$17.81 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$35.62. The estimate of annualized cost to respondents for hour burden is \$35.62 times 1700 hours or \$60,554.00. <https://www.bls.gov/oes/current/oes211093.htm>

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

There are no other costs to respondents.

14. Annualized Cost to the Federal Government

We estimate total annual cost to the federal government to be \$42,634.00. This includes the costs of information collection, mailing list compilation and maintenance, mailing, editing, analysis, negotiation, publication of results, technical assistance, and monitoring. Estimated cost is based on an estimated average hourly federal salary of \$40.82 per hour (per [OPM](#)).

15. Explanation for Program Changes or Adjustments

There are minor clarifications to the existing content included in the instrument. The two primary changes are clarifying when a new tribal resolution needs to be submitted with a Tribal Family Assistance Plan and including the requirements of 45 CFR 286.35, “What are the proper uses of Tribal Family Assistance Grant funds,” in the guidance and the requirements document.

We also adjusted the annual number of burden hours because one additional tribe was approved to administer the Tribal TANF program, increasing the number of grantees from 74 to 75 since the form was last approved. The burden hours are now 1,700, an increase of 68 hours.

16. Plans for Tabulation and Publication and Project Time Schedule

Much of the information is published in the TANF Annual Report to Congress, which is also posted on the HHS/ACF Website.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.