

# **TANF State Plan Information Collection**

**OMB Information Collection Request  
0970 - 0145**

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

**July 2022**

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

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

The Temporary Assistance for Needy Families (TANF) state plan is a mandatory submission to the Secretary of the Department of Health and Human Services by the state. The Secretary has delegated the collection and review of those submissions to the Office of Family Assistance (OFA) in the Administration for Children and Families. The TANF state plan 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, within a 27-month period.

This is a reinstatement without changes to the prior TANF state plan information collection.

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

In accordance with section 402(a) of the Social Security Act, states are required periodically to renew their state plans to continue to receive federal funds under TANF. This renewal process requires states to submit a TANF plan that contains all of the required elements listed in section 402(a), including the certifications specified under sections 402(a)(2) through (8). As provided in the statute, the Secretary makes a determination whether or not each state plan is complete by ensuring that all required elements are included. 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. In addition, OFA uses the state plan information to better understand the activities under each state's TANF program and summarizes some of this data in regular Reports to Congress, as required by Section 411(b) of the Social Security Act.

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

Grantees submit their TANF state plan renewals and amendments electronically. Grantees attach their plans to a completed SF-424M, which is a common standardized form used by multiple federal agencies, in the ACF Online Data Collection System (OLDC), unless they have opted to make TANF part of a plan combined under the Workforce Innovation and Opportunity Act (WIOA) plan, in which case the state must use the online WIOA portal maintained by the Department of Education for all WIOA state plans.

**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**

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 8, 2022 (87 FR 20870) and provided a sixty-day period for public comment. During the notice and comment period, OFA did not receive comments.

**9. Explanation of Any Payment or Gift to Respondents**

No payments 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

Information Collection	Number of Respondents (Annual)	Number of Responses per Respondent	Average Burden Hours Per Response	Annual 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 \$32,949.18. This is based on the estimate that preparation will take 594 state staff-hours at an average cost of \$55.47 per hours (including overhead, fringe benefits, etc) per the average state government employer costs from the current Bureau of Labor Statistics estimates noted at <https://www.bls.gov/news.release/pdf/ecec.pdf>.

## 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 staff hours at an average cost of \$50 per hours

(including overhead, fringe benefits, etc). Any other potential minor expenses are already built into our general administrative expense.

**15. Explanation for Program Changes or Adjustments**

There are no changes proposed as part of this request.

**16. Plans for Tabulation and Publication and Project Time Schedule**

Section 411 (b) of the Social Security Act 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/>

**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