

Guidance for the Tribal Temporary Assistance for Needy Families (TANF) Program

**OMB Information Collection Request
0970 – 0157**

Supporting Statement Part A - Justification

July 2023

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

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 Tribal Family Assistance Plan (TFAP). The TFAP 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 TFAP 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 TFAP 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 TFAPs 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 TFAP in Microsoft Word or other Word processing software. Tribes are required to submit TFAPs 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, TFAPs 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), the Administrations for Children and Families (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 25, 2023, Volume 88, Number 79, page 24992, 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	\$40.00	\$68,000.00
Estimated Annual Burden Total:					1700	Estimated Annual Cost Total:	\$68,000.00

The Respondents are continuing Tribal TANF Programs or those who are applying to become Tribal TANF programs. As TFAPs come up for renewal every three years, approximately one third of program renew their TFAP 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 2022 which is \$20.00 per hour (mean hourly wage). To account for fringe benefits and overhead the rate was multiplied by two which is \$40.00. The estimate of annualized cost to respondents for hour burden is \$40.00 times 1700 hours or \$68,000.00. <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 \$122,382.00. 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 \$57.63 per hour ([per OPM salary table for GS 11 and up, including base and locality pay](#)), multiplied by 2 to include fringe benefits, or \$115.26. _

15. Explanation for Program Changes or Adjustments

There are minor clarifications to the existing content included in the instrument. These include edits, such as updating hyperlinks and correcting typographical errors. Additionally, the list of requirements has been reformatted so that it is easier to read and use. There are no updates to the burden estimates.

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 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.