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Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget (OMB)

From: Deborah List, Acting Deputy Director
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Administration for Children and Families (ACF)

Date: June 3, 2025

Subject: NonSubstantive Change Request – Temporary Assistance for Needy Families (TANF) Data Reporting for Work Participation (OMB #0970-0338)

This memo requests approval of nonsubstantive changes to the approved information collection, TANF Data Reporting for Work Participation (OMB #0970-0338).

Background

Revised instructions for the TANF and Separate State Program - Maintenance-of-Effort (SSP-MOE) Data Report were recently approved as part of a nonsubstantive change request to the TANF Data Reporting for Work Participation information collection. Since approval, ongoing discussion and questions from states have prompted OFA to propose minor changes to add clarifying guidance and ensure consistency and alignment with TANF regulations. We are requesting approval of these minor changes to ensure that states are able to continue reporting with minimum disruption.

Overview of Requested Changes

- Add back original guidance to mirror federal regulations and additional clarifying guidance
 - Federal Time Limit Exemptions (TANF Section 1 #28)
 - Add “head-of household, spouse of a head-of-household, or minor child head-of-household” after “adult” throughout guidance and in the description for code 02
 - Add “Under TANF rules, an eligible family that does not include a recipient who is an adult head-of-household, a spouse of the head-of-household, or a minor child head-of-household who has received federally-funded assistance for 60 countable months may continue to receive assistance. A countable month is a month of assistance for which the head-of-household or the spouse of the head-of-household is not exempt from the federal time-limit provisions.”
 - Expand on the sentence “TANF rules provide for two categories of exceptions” by adding at the end “: exempt from the accrual of months of assistance and exempt from termination of assistance.”
 - Remove reference to code 02 in the guidance for families who may be exempt while having an adult head-of-household, spouse of a head-of-

- household, or minor child head-of-household.
 - Add “Families that do not include an adult head-of household, spouse of a head-of-household, or minor child head-of-household who is receiving federally-funded assistance for the reporting month can be exempt from both categories of exceptions (**code 02**).”
- Number of Months Countable toward Federal Time Limit (TANF Section 1 #44)
 - Add “head-of household, spouse of a head-of-household, or minor child head-of-household” after “adult”
 - Add reporting guidance for individuals whose family affiliation code is 2, 3, or 5 to include “may enter the number of months or” before “000”
- Add back a data element that had been removed, without changes to original coding options
 - Receives Subsidized Child Care: (TANF Section 1 #17; SSP-MOE Section 1 #15)
 - Instruction: If the [TANF or SSP-MOE] family receives subsidized child care for the reporting month, enter code “1” or “2,” whichever is appropriate. Otherwise, enter code “3.”
 - Coding options:
 - 1 = Yes, receives child care funded entirely or in part with federal funds (e.g., receives TANF, CCDF, SSBG, or other federally funded child care).
 - 2 = Yes, receives child care funded entirely under a state, Tribal, and/or local program (i.e., no federal funds used).
 - 3 = No subsidized child care received.
- Add an asterisk (*) to a data element to flag an instance that would trigger “fatal” errors for users of a legacy data preparation tool (applies to layouts and instruction)
 - Citizenship/Immigration Status (TANF Section 1 #42 and 76, TANF Section 2 #25)
- Add clarifying guidance to an existing code option
 - Citizenship/Immigration Status (TANF Section 1 #42 and 76)
 - Add “(applies only to item #8, Funding Stream, code 2)” to code 3 = Non-qualified alien
- Revise data element guidance to ensure consistency across sections
 - Educational Level (TANF Section 1 #41)
 - Add “; code 99 is not an option” to the end of the first line of instructions.
 - Educational Level (SSP-MOE Section 1 #37)
 - Remove “Code 99 is not an option for individuals whose family affiliation code is 1.”
 - Add “; code 99 is not an option” to the end of the first line of instructions.
 - Educational Level (SSP-MOE Section 1 #68)
 - Remove “Optional for children whose family affiliation code is 4; if so, enter 99.”
 - Employment Status (SSP-MOE Section 2 #25) (applies to layouts and instruction)
 - Add “Optional for individuals whose family affiliation is 4 or 5; if so, enter 0*.”
- Add guidance for Fiscal Responsibility Act of 2023 (FRA) pilot states
 - Work Participation Status (TANF Section 1 #49; SSP-MOE Section 1 #42)
 - Add “or living in an approved pilot state” to code 99 = Not applicable if

- not a work-eligible individual
- Add footnote to define “pilot state”:
 - “A pilot state is a state selected by the U.S. Department of Health and Human Services (HHS) to participate in new pilot projects for performance and accountability measures under the Fiscal Responsibility Act of 2023, Pub, L. No. 118-5, §302, 137 Stat. 34 (2023).”
- Work Activity Hours (TANF Section 1 #50-64; SSP-MOE Section 1 #43-57)
 - Add “Approved pilot states may space-fill or input 00 for fields # [50-64 or 43-57].” at the end of the guidance preceding these items
- Correct alphabetical order of sub-elements
 - Amount of Unearned Income (TANF Section 1 #66; SSP-MOE Section 1 #59)
 - Change order from “a, a, b, c, d” to “a, b, c, d, e”

Time Sensitivities

We request approval as soon as possible to allow states to adapt their systems with the correct coding instructions.