

Temporary Assistance for Needy Families (TANF) Data Reporting for Work Participation

**OMB Information Collection Request
0970 - 0338**

Supporting Statement Part A - Justification

November 2025

Type of Request: Revision

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

Summary

Temporary Assistance for Needy Families (TANF) Data Reporting for Work Participation (formerly titled DRA TANF Final Rule; OMB #0970-0338) includes the TANF work verification procedures, the Caseload Reduction Documentation Process, the Reasonable Cause/Corrective Compliance Documentation Process, the TANF Data Report, the Separate State Programs - Maintenance of Effort (SSP-MOE) Data Report and TANF Sampling and Statistical Methods. We are requesting a three-year extension for the information collections approved under this OMB number. We are proposing to continue the same information collections with no changes, with the exception of the ACF-202: Caseload Reduction Report for which we are proposing substantive changes to the instructions and form.

1. Circumstances Making the Collection of Information Necessary

The Deficit Reduction Act of 2005 (DRA) reauthorized the TANF program and imposed a new data requirement that states prepare and submit data verification procedures and replaced other data requirements with new versions including: the TANF Data Report, the SSP-MOE Data Report, the Caseload Reduction Documentation Process, and the Reasonable Cause/Corrective Compliance Documentation Process. These requirements are also discussed in Part 265 of the TANF Final Rule.

The proposed revision to the ACF-202 Caseload Reduction Credit Report is in response to the requirements of section 301 of the Fiscal Responsibility Act of 2023 (FRA), which recalibrates the caseload reduction credit by amending Section 407(b)(3) of the Social Security Act (42 U.S.C. § 607(b)(3)). Section 407(b)(3) of the Social Security Act requires the Administration for Children and Families (ACF) to reduce a state's required work participation rate for a fiscal year by the state's caseload reduction credit for that fiscal year (42 U.S.C. § 607(b)(3)). The caseload reduction credit gives a state credit for reducing its caseload between a base year and a comparison year (42 U.S.C. § 607(b)(3)(A)). States submit data for the calculation of their caseload reduction credit by completing form ACF-202. The FRA changes the base-year caseload from FY 2005 to FY 2015 (Pub. L. 118-15, § 301 (2023), 137 Stat. 34). We are proposing to revise the Caseload Reduction Documentation Process as required by the FRA by striking "2005" and inserting "2015." There are additional minor changes to the instructions and form for this information collection to update the reporting due date for FY 2026, update submission and general instructions, and change 'State' to lowercase, where applicable.

Authority: 42 U.S.C. 601, 607, 609, 611, 613, and 1302

2. Purpose and Use of the Information Collection

These data are and will be used by ACF to assess and evaluate the TANF program and include documentation of each State's status in: (1) meeting statutorily required participation rates; (2) qualifying for work participation caseload reduction credit; (3) being subject to certain statutorily mandated penalties; (4) being considered for a "reasonable cause" exception and a reduction in the amount of the penalty for failure to meet the work participation requirements; and (5) validating data.

3. Use of Improved Information Technology and Burden Reduction

States must file the quarterly TANF Data Report and the quarterly SSP-MOE Data Report electronically based on format specifications that ACF provides. If they choose, states submit their caseload reduction credit report through a Microsoft Excel template. The decision to use electronic filing was based on a need to reduce burden to States and territories and to increase the efficiency and timeliness of these data collections.

4. Efforts to Identify Duplication and Use of Similar Information

There are no TANF-specific data available that are similar to what we are proposing to collect.

5. Impact on Small Businesses or Other Small Entities

These information collections do not impact small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

The statute mandates the quarterly collection of most of the data in the TANF Data Report and the SSP-MOE Data Report; sampling from states and territories that submit sampled data are quarterly occurrences; The Caseload Reduction Documentation Process and the Reasonable Cause/Corrective Compliance Documentation Process are annual occurrences because the statute provides for annual evaluation of caseload reduction and the annual imposition of penalties.

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

No special circumstances relating to the Guidelines of 5 CFR 1320.5

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 August 18, 2025 (90 FR 39193) and provided a sixty-day period for public comment. We did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

These data collections do not involve any payment or gift to respondents other than remuneration of grantees.

10. Assurance of Confidentiality Provided to Respondents

ACF established a System of Record for the TANF Data Report and the SSP-MOE Data Report to ensure the level of confidentiality pursuant to the Privacy Act. The System of Records Notice for Temporary Assistance for Needy Families (TANF) Data, 09-80-0375 was published on April 12, 2024 at 89 FR 25880-25883, Document Number: 2024-07823.

11. Justification for Sensitive Questions

These data collections do not contain any questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

Estimated Burden Hours

The 50 states, District of Columbia, and 3 territories are required to submit a Work Verification Plan (WVP) 45 CFR §§ 261.60 - 261.63. The WVP contains six sections: countable work activities; hours engaged in work; work-eligible individuals; internal controls; verification of other data used in calculating the work participation rates; and submittal procedures. When they need to submit a revision, we estimate it takes an average of 30 hours to revise the WVP for each state. Since every state has submitted a WVP, any future submissions would be for revised WVPs, and, on average, fewer than 10 submit a revision each year.

The caseload reduction credit gives a state credit for reducing its caseload between a base year and a comparison year. States submit data annually for the calculation of their caseload

reduction credit, including impact estimates of eligibility changes, by completing form ACF-202 and it takes approximately 40 hours to finish the form each year. With the baseline year change to 2015, there are fewer eligibility changes to report.

On an as needed basis, States, the District of Columbia, and territories are able to file the Reasonable Cause/Corrective Compliance Documentation Process 45 CFR §§ 262.4, 262.6, & 262.7; § 261.51 if they failed the work participation requirement. An average of 240 hours are needed to complete the documentation process per state annually. On average, fewer than 9 states complete this process each year.

States, the District of Columbia, and territories need to collect, prepare the data files, and submit TANF Data Report Part 265 (45 CFR § 265), and it requires each state an average of 2100 hours per quarter to complete the process for one quarter of data.

States and territories that have the SSP-MOE program need to collect, prepare the data files, and submit SSP-MOE Data Report Part 265 (45 CFR § 265), and it requires each state with an SSP-MOE program an average of 714 hours per quarter to complete the process for one quarter of data.

States and territories that submit sampled data need to sample their data according to the sample plans that are approved by ACF (45 CFR § 265.5). The procedure to sample data and send sample lists to ACF will take an average of 48 hours for each sampling state/territory each quarter.

Estimated Cost to Respondents

The cost to respondents was calculated using the hourly mean wage data from May 2024 for the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] in State Government, excluding schools and hospitals, which is \$26.06 per hour. To account for fringe benefits and overhead the rate is multiplied by two, which is \$52.12.

The following table includes all information collections currently approved under this OMB #. This revision request only proposes changes to the content of the second row: *Caseload Reduction Credit Documentation Process, Form ACF-202 §§ 261.41 & 261.44*. Burden estimates have been revised to reflect that states spend less time on revisions than initial submissions, and that not all states submit each form each year.

Information Collection Title	Total/Annual Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Work Verification Plan §§ 261.60 - 261.63	10	1	30	900	300	\$52.12	\$15,636.00
Caseload Reduction Documentation Process, ACF-202 §§ 261.41 & 261.44	54	1	40	6,480	2,160	\$52.12	\$112,579.20
Reasonable Cause/Corrective Compliance Documentation Process §§ 262.4, 262.6, & 262.7; § 261.51	9	1	240	6,480	2,160	\$52.12	\$112,579.20
TANF Data Report Part 265	54	4	2100	1,360,800	453,600	\$52.12	\$23,641,632.00
SSP-MOE Data Report – Part 265	29	4	714	248,472	82,824	\$52.12	\$4,316,786.88
TANF Sampling and Statistical Methods Manual Part 265.5	30	4	48	17,280	5,760	\$52.12	\$300,211.20
Estimated Annual Burden Total:					546,804	Estimated Annual Cost Total:	\$28,299,424.48

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 federal time on these information collection activities to be 40,000 hours. This includes the costs of information collection, development, tests, printing forms, mailing list compilation and maintenance, mailing or enumeration, editing, coding, tabulation, analysis, publication of results, technical assistance, and monitoring. Based on an estimated average hourly federal salary of \$54 per hour for federal employee (GS12 -14), to account for fringe benefits and overhead the rate is multiplied by two which is \$108, the total estimated average annual cost to the federal government is \$1,080,000.

15. Explanation for Program Changes or Adjustments

Reporting requirements have not changed since the last renewal of this information collection in 2023. However, estimates of burden have been adjusted to reflect that states spend less time on revisions than initial submissions, and that not all states submit each form each year.

16. Plans for Tabulation and Publication and Project Time Schedule

ACF analyzes these data upon submission by 50 states, District of Columbia and 3 territories. One of the primary purposes of these information collections is to calculate participation rates as required by section 407(a) of the Social Security Act as amended by PRWORA and DRA. Work Participation Rates and the characteristics of TANF populations are published yearly in the TANF Annual Report to Congress.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.