

OMAHA TRIBE OF NEBRASKA

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Omaha Tribe of Nebraska

Administration for Children and Families

Proposed Information Collection Activity: Guidance for Tribal Temporary Assistance for Needy Families Program (Form ACF-123)

The Omaha Tribe of Nebraska appreciates the opportunity to submit written comments regarding the proposed revisions to the Guidance for the Tribal Temporary Assistance for Needy Families Program.

The Omaha Tribe of Nebraska is a federally recognized Tribal Nation headquartered in Macy, Nebraska, with a reservation located in northeastern Nebraska along the Missouri River. The Tribe exercises its inherent sovereign authority to provide governmental services to its citizens and remains committed to strengthening Tribal families through culturally appropriate human services, economic development, education, public safety, and community wellness. The Tribal Temporary Assistance for Needy Families Program is an essential component of these efforts, allowing the Tribe to design and administer family assistance programs that reflect the unique needs, values, and priorities of the Omaha people.

The Omaha Tribe supports the Administration for Children and Families' efforts to modernize and reorganize the Tribal Temporary Assistance for Needy Families guidance to make it more accessible and easier to navigate. Improving the organization of the guidance and reducing unnecessary administrative burden are positive steps that can allow Tribal governments to dedicate more time and resources to serving families rather than completing paperwork. However, any revisions to the guidance must continue to recognize Tribal sovereignty, uphold the federal trust responsibility, and preserve the flexibility Congress intended when authorizing Tribal administration of the Temporary Assistance for Needy Families Program. The Omaha Tribe respectfully offers the following comments.

Tribal Self-Determination Must Remain the Foundation

The Tribal Temporary Assistance for Needy Families Program was established to allow Tribal Nations to design programs that reflect their own governmental priorities and community needs. Tribal governments understand the barriers facing their citizens and are best positioned to determine how services should be delivered.

The Tribal Family Assistance Plan should remain in a strategic planning document that demonstrates how each Tribal Nation intends to achieve program goals while preserving the

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flexibility necessary to develop culturally appropriate approaches. The guidance should avoid creating unnecessary prescriptive requirements that limit innovation or encourage state-based program models.

Recognize the Unique Needs of Rural Tribal Communities

The Omaha Reservation is located in a rural area where families often experience barriers that differ significantly from those encountered in urban communities. Limited employment opportunities, inadequate public transportation, shortages of affordable housing, childcare challenges, behavioral health needs, and limited access to broadband all affect family stability and economic opportunity.

These realities directly influence the administration of the Tribal Temporary Assistance for Needy Families Program. The guidance should recognize that successful employment and self-sufficiency strategies may require greater flexibility for rural Tribal Nations, including support for transportation, workforce development, education, and culturally appropriate case management.

Support Coordination Across Tribal Programs

Many Tribal citizens receive services through multiple Tribal programs administered by the Omaha Tribe, including child welfare, child care, behavioral health, workforce development, housing, education, and other family support services.

The Administration for Children and Families should continue working to align planning and reporting requirements across federal human services programs. Reducing duplicative administrative requirements would allow Tribal governments to better coordinate services, improve outcomes for families, and maximize limited staff resources.

The Omaha Tribe also encourages continued coordination with employment and training programs authorized under Public Law 102-477 to better support integrated service delivery for Tribal citizens seeking education, employment, and economic independence.

Provide Ongoing Technical Assistance

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While improvements to the guidance are welcome, many Tribal governments continue to operate with limited administrative capacity. Successful implementation of revised guidance requires ongoing support beyond publication of the final document.

The Omaha Tribe recommends that the Administration for Children and Families provide:

- National and regional training following the implementation of revised guidance.
- Model Tribal Family Assistance Plans that may be adapted to local circumstances.
- Individual technical assistance for Tribal administrators.
- Plain-language implementation guides and planning tools.
- Opportunities for peer learning among Tribal Temporary Assistance for Needy Families programs.

These resources would improve implementation while respecting Tribal sovereignty and local decision-making.

Respect Tribal Data Sovereignty

The Omaha Tribe supports responsible data collection that improves program quality and accountability. However, data generated through Tribal programs belong to Tribal Nations and should be governed accordingly.

Future revisions to reporting requirements should recognize Tribal ownership of program information and ensure that any additional data collection is developed in consultation with Tribal Nations. Data should support Tribal decision-making, improve service delivery, and reduce administrative burden rather than create additional reporting obligations without corresponding benefits.

Reduce Administrative Burden

Although the proposed revisions simplify the guidance, Tribal governments continue to experience significant administrative responsibilities associated with plan development, amendments, reporting, and monitoring.

The Omaha Tribe encourages the Administration for Children and Families to continue identifying opportunities to:

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- Simplify Tribal Family Assistance Plan amendments.
- Eliminate duplicative reporting requirements.
- Improve electronic submission processes.
- Coordinate review timelines.
- Reduce unnecessary documentation requirements where permitted by law.

Every hour devoted to administrative compliance is time that cannot be spent serving Tribal families.

Honor the Federal Trust Responsibility

The Tribal Temporary Assistance for Needy Families Program reflects the unique government-to-government relationship between the United States and federally recognized Tribal Nations. The federal trust responsibility requires meaningful consultation whenever policies affecting Tribal governments are developed or revised.

The Omaha Tribe encourages the Administration for Children and Families to continue engaging Tribal Nations early and throughout the policy development process to ensure that future guidance reflects Tribal priorities and operational realities.

Conclusion

The Omaha Tribe of Nebraska appreciates the Administration for Children and Families' efforts to improve the Tribal Temporary Assistance for Needy Families guidance and reduce administrative burden. These revisions represent meaningful progress toward making the guidance more useful and accessible for Tribal governments.

As the Administration for Children and Families finalizes this guidance, we encourage continued emphasis on Tribal sovereignty, self-determination, administrative flexibility, rural service delivery challenges, Tribal data sovereignty, and ongoing government-to-government consultation. Strengthening these principles will better equip Tribal Nations to provide effective services that improve the health, stability, and economic well-being of Tribal families.

The Omaha Tribe of Nebraska thanks the Administration for Children and Families for the opportunity to provide these comments and looks forward to continued partnership in strengthening Tribal family assistance programs.