Fiscal Responsibility Act TANF Pilot Program 2025 Information Collection

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A

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Submitted By:
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Part A

Executive Summary

- **Type of Request:** This Information Collection Request is for a generic information collection under the umbrella generic, Formative Data Collections for Program Support (0970-0531).

- **Progress to Date:** This is a reissuing of a previously approved information collection to select states for the Fiscal Responsibility Act of 2023 (FRA) pilot program. The prior information collection was approved and issued in the summer of 2024 under the title, *Fiscal Responsibility Act TANF Pilot Program*. ACF also previously conducted listening sessions to inform the design of this information collection under this umbrella generic (Title: TANF Pilot Convenings).

- **Description of Request:** The Temporary Assistance for Needy Families (TANF) pilot program was enacted by the FRA. All state TANF grantees may (but are not required to) express interest in being considered by ACF to serve as one of the pilot sites. There is no new funding associated with the pilot program. This information collection will inform ACF's selection of up to five states to participate as a pilot site. The information collection will be in the form of an open-ended request to states for specific information. We do not intend for this information to be used as the principal basis for public policy decisions.

- **Time Sensitivity:** Approval of this data collection is highly time sensitive. ACF needs to issue the information collection request to states by June 2025, in order to make decisions about pilot site selection and initiate the pilots by October 1, 2025.

Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

A1. Necessity for Collection

The Fiscal Responsibility Act of 2023 (FRA) requires the Department of Health and Human Services (HHS) to carry out a pilot program to build the knowledge base around new ways of measuring the performance of Temporary Assistance for Needy Families (TANF) programs. Under the pilot, HHS may select up to five state TANF grantees to negotiate performance benchmarks for work and family well-being outcomes instead of adhering to the standard TANF Work Participation Rate.

The Office of Family Assistance (OFA) within HHS' Administration for Children and Families (ACF) administers federal grant programs that foster family economic security and stability, including the TANF program. As such, OFA is responsible for designing and carrying out the FRA TANF Pilot Program, including selecting the five states to participate in the pilot, working with the states to identify performance benchmarks and associated targets, and monitoring performance of the pilot states throughout the duration of the pilot. OFA also intends to provide programmatic technical assistance (TA) to the pilot states. ACF's Office of Planning, Research, and Evaluation (OPRE) studies ACF programs, including TANF, and the populations they serve through rigorous research and evaluation projects. OPRE will be responsible for the federal evaluation of the FRA TANF Pilots Program and intends to provide data- and evaluation-related TA to the pilot states.

This information collection is necessary to comply with the FRA, which states:

> **SEC. 302. PILOT PROJECTS FOR PROMOTING ACCOUNTABILITY BY MEASURING WORK OUTCOMES.**
>
> Section 411 of the Social Security Act (42 U.S.C. 611) is amended by adding at the end the following:
> ''(e) PILOT PROJECTS FOR PROMOTING ACCOUNTABILITY BY MEASURING WORK OUTCOMES. —
> ''(1) IN GENERAL. — The Secretary shall carry out a pilot program under which the Secretary may select up to 5 States to which a grant is made under section 403(a) for a fiscal year to negotiate performance benchmarks for work and family outcomes for recipients of assistance under the State program funded under this part, and programs funded with qualified State expenditures. The Secretary shall issue guidance on how States apply for participation in the pilot."

See Appendix A for the full text of the relevant sections of the FRA.

Background

ACF received approval for a previous information collection (Title: Fiscal Responsibility Act TANF Pilot Program) on July 17, 2024. Twenty-three states responded to the information collection from July through September 2024. In November 2024, ACF announced the selection of five states (California, Kentucky, Maine, Minnesota, and Ohio) to participate in the FRA TANF Pilot Program. In March 2025, the Trump Administration announced a new direction for the FRA TANF Pilot Program, which stated: "As a result of the Trump Administration's determination of a new approach to the Temporary Assistance for Needy Families (TANF) pilot program authorized by the Fiscal Responsibility Act of 2023, the Office of Family Assistance (OFA) is ending pilot participation for the states selected in November of 2024: California, Kentucky, Maine, Minnesota, and Ohio. OFA will be issuing a new request for pilot proposals aligned with the Administration's key priorities and measures of success." This new request is to collect information from states about their interest and suitability for participation in the new direction being taken for the FRA TANF Pilot Program.

A2. Purpose

Purpose and Use

The purpose of this proposed information collection is for ACF to learn about the practices and processes that state TANF grantees would implement to establish new performance benchmarks if they were in the pilot program. This information will allow ACF to understand states' interest in participating in the pilot program and readiness to do so. This information request will be one of the inputs that informs selection of the pilot sites. ACF will also draw on existing administrative data and information collected during listening sessions held with external entities[1] to inform pilot site selection.

As noted above, there is no funding attached to the pilot program. States selected to participate in the pilot effort will work directly with ACF to set new performance benchmarks and report on progress. Selected sites will also receive TA supported by ACF and be expected to participate in a federal evaluation. Thus, in addition to helping to inform the selection of pilot sites, the information collected under this request will also inform ACF's planning for the programmatic and evaluation-related TA and support to be provided to the five pilot sites and for the federal evaluation. In the future, ACF anticipates submitting other information collection requests to OMB for data collection protocols for the federal evaluation of the pilot program.

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531):

- Planning for provision of programmatic or evaluation-related T/TA.
- Obtaining input on the development of program performance measures.
- Obtaining feedback about processes and/or practices to inform ACF program development or support.

The information collected is meant to contribute to the body of knowledge on ACF programs. It is not intended to be used as the principal basis for a decision by a federal decision-maker and is not expected to meet the threshold of influential or highly influential scientific information.

Guiding Questions

As demonstrated in Instrument 1, ACF intends to ask states specific questions to better understand (1) why the state would like to participate in the pilot, (2) what activities it proposes to conduct under the pilot that could not be accomplished otherwise, and (3) any barriers the state may have to participating.

Information Collection Procedures and Processes

Instrument 1 will be sent to all state TANF grantees electronically. All state TANF grantees may (but are not required to) express interest in being considered to serve as one of the pilot sites by submitting a written response to the questions in Instrument 1 to ACF via email. This is a one-time data collection and states are expected to have 45 days to respond.

[1] Listening session protocols were approved under this umbrella generic (0970-0531) with the title TANF Pilot Convenings.

This information collection is not intended to be representative of all states nor generalizable to any subpopulations.

Data Collection Activity	*Instrument*	*Respondent, Content, Purpose of Collection*	*Mode and Duration*
Proposal for TANF Pilot Program Participation	Instrument 1	**Respondents**: state TANF grantees **Content**: questions related to states' interest in and readiness for participating in the pilot program **Purpose**: to inform ACF's selection of up to five states to participate in the FRA TANF pilot program; and to inform planning for the programmatic and evaluation-related technical assistance that ACF will provide to the pilot sites	**Mode**: Electronic Submission **Duration**: 10 hours

Other Data Sources and Uses of Information

In addition to this information collection, ACF intends to use administrative data to inform pilot site selection. This includes state TANF plans and state TANF reports already collected by and available to ACF. Specific forms include:

- TANF Expenditure Report: ACF-196R (OMB #0970-0446)
- TANF Data Report and the Separate State Program – Maintenance of Effort (SSP-MOE) Data Report for Work Participation: ACF-199 and ACF-209 (OMB #0970-0338)
- Annual Report on State MOE Programs: ACF-204 (OMB #0970-0248)

Using this existing administrative data, ACF will reduce administrative burden by minimizing the number of questions in this information collection.

Additionally, ACF held listening sessions with external entities to inform its approach to the FRA TANF pilot program selection and design. In accordance with the Paperwork Reduction Act (PRA), these listening sessions were approved under this umbrella generic (0970-0531; TANF Pilot Convenings).

A3. Use of Information Technology to Reduce Burden

ACF will notify states of the opportunity to express interest in being considered to serve as one of the pilot sites electronically (i.e., via email) and will also provide a centralized email address for states to submit responses electronically.

A4. Use of Existing Data: Efforts to reduce duplication, minimize burden, and increase utility and government efficiency

As noted in section A2, ACF will minimize administrative burden and reduce duplication by also using existing administrative data to inform pilot site selection. ACF will not use information previously submitted by the states under the first round of pilot site selection to inform the second round of pilot site selection. Given the new direction for the pilot program announced by the Trump Administration, ACF expects that different states may be interested in participating in the pilot and/or states that previously responded may propose a different approach.

A5. Impact on Small Businesses

No small businesses will be involved with this information collection.

A6. Consequences of Less Frequent Collection

This is a one-time data collection.

A7. Now subsumed under 2(b) above and 10 (below)

A8. Consultation

Federal Register Notice and Comments

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 request to extend approval of the umbrella generic with minor changes. The notice was published on January 28, 2022, (87 FR 4603), and provided a sixty-day period for public comment. ACF did not receive any comments on the first notice. A second notice was published, allowing a thirty-day period for public comment, in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice.

ACF also published a notice in the Federal Register announcing the agency's intention to reissue an information collection to request information from interested states for the FRA TANF pilot program. The notice was published on May 21, 2025 (90 FR 21776) and provided a thirty-day period for public comment. ACF received four comments. None of the comments recommended any changes to the information collection. Only one comment was a substantive comment regarding the pilot program is supportive of the overall goals of the new TANF pilot programs.

Consultation with Experts

ACF held listening sessions with external entities to inform all aspects of the FRA TANF pilot program selection and design. In accordance with the Paperwork Reduction Act (PRA), these listening sessions were approved under this umbrella generic (0970-0531; TANF Pilot Convenings).

A9. Tokens of Appreciation

Not applicable.

A10. Privacy: Procedures to protect privacy of information, while maximizing data sharing

Personally Identifiable Information

No personally identifiable information will be requested.

Assurances of Privacy

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law.

Data Security and Monitoring

The information collected will be submitted electronically to an ACF email address. A federal staff person will download the proposals and save them in a Microsoft Teams folder with access restricted to pre-selected federal reviewers. After selection of the pilot states, OFA will save final copies of the proposals in a secure shared drive with restricted access for record keeping purposes.

A11. Sensitive Information [2]

This information collection does not include sensitive information.

A12. Burden

Explanation of Burden Estimates

As previously noted, the Proposal for TANF Pilot Program Participation (Instrument 1) is intentionally succinct and will be considered in combination with existing sources of administrative data. Therefore, ACF estimates that a state will spend approximately 10 hours compiling information and responding to the questions in Instrument 1.

In the first issuing of this information collection in July 2024, ACF received responses from 23 states. The estimated number of respondents in the table below is based on the number of responses received in the first round and ACF's expectations for number of responses in the second round.

Estimated Annualized Cost to Respondents

We calculated an average hourly wage rate of $40.10 using the following May 2023 National Occupational Employment and Wage Estimates (bls.gov) for Social and Community Service Managers (BLS Job Code 11-9151). To account for overhead and fringe benefits, we multiplied by two ($80.20).

Instrument	No. of Respondents	No. of Responses per	Avg. Burden	Total Burden	Average Hourly	Total Annual

[2] Examples of sensitive topics include (but not limited to): social security number; sex behavior and attitudes; illegal, anti-social, self-incriminating and demeaning behavior; critical appraisals of other individuals with whom respondents have close relationships, e.g., family, pupil-teacher, employee-supervisor; mental and psychological problems potentially embarrassing to respondents; religion and indicators of religion; community activities which indicate political affiliation and attitudes; legally recognized privileged and analogous relationships, such as those of lawyers, physicians and ministers; records describing how an individual exercises rights guaranteed by the First Amendment; receipt of economic assistance from the government (e.g., unemployment or WIC or SNAP); immigration/citizenship status.

	(total over request period)	Respondent (total over request period)	per Response (in hours)	(in hours)	Wage Rate	Respondent Cost
Instrument 1: Proposal for TANF Pilot Program Participation	25	1	10	250	$ 80.20	$ 20,050

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

There will be no costs beyond the normal labor costs for federal staff to review the information submitted, which is estimated to be $4,911. This amount is calculated with the following assumptions:

- Six federal staff will review each proposal, with a median hourly wage of $65.48 (GS-13, Step 5 in Washington, DC)
- Each federal reviewer will spend approximately 12.5 hours reviewing proposals (25 proposals for 30 minutes each).

A15. Reasons for changes in burden

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531).

A16. Timeline

Pending OMB approval, ACF plans to implement this process over the following timeline:

- June 2025: ACF releases the Proposal for TANF Pilot Program Participation (Instrument 1)
- August 2025: Interested states submit requested information to be considered for selection as a pilot site
- October 1, 2025: ACF selects pilots and initiates pilots

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Instrument 1 – Request for Proposals for TANF Pilot Projects Under the Fiscal Responsibility Act of 2023

Appendix A - Section 302 of the FRA