



# Tribal TANF Program Resource Guide

August 2022



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## Introduction

The Administration for Children and Families (ACF) developed this Resource Guide as a reference for Tribal TANF grantee leaders, administrators, managers, frontline workers, and other Tribal TANF staff or partners. It is intended to summarize Tribal TANF history, policy, and key requirements for program staff.

The information provided in this Resource Guide is summary in nature and not inclusive of all ACF guidance and TANF policy. The content is intended for training and informational purposes; it should not be relied upon as official policy issuances of ACF. Grantees who have questions about these materials or content should contact their ACF Regional Office.

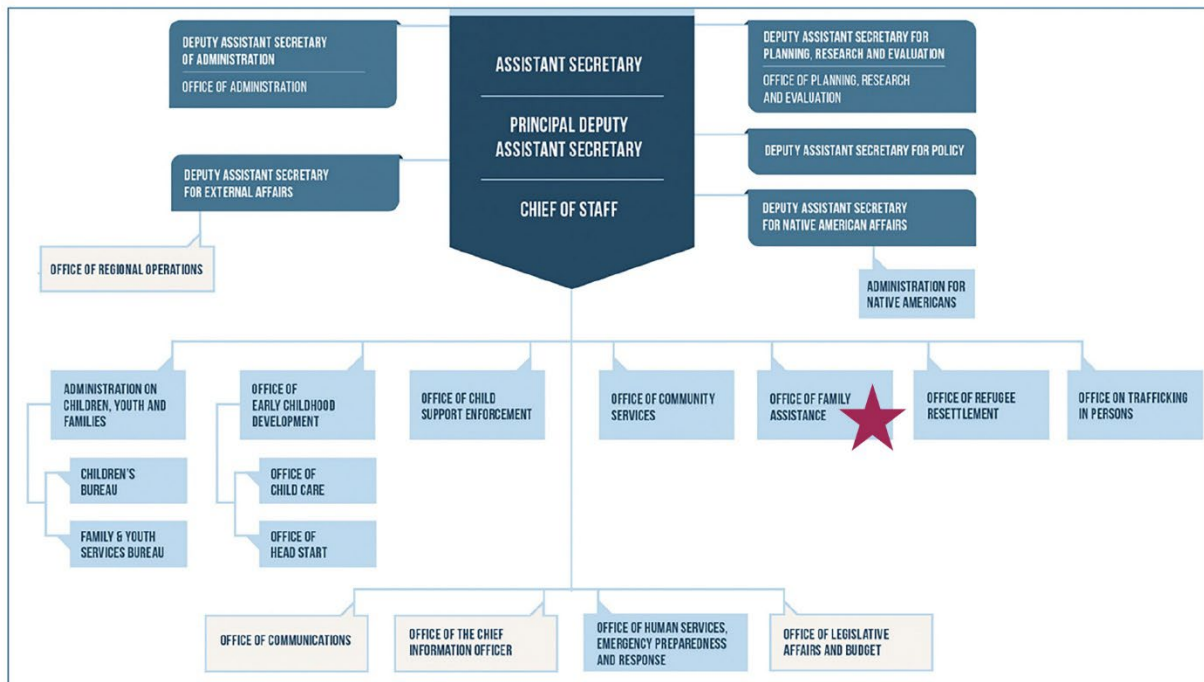


## Organizational Overview

**Administration for Children and Families (ACF)**, a division of the U.S. Department of Health and Human Services (HHS), promotes the economic and social well-being of families, children, individuals, and communities through the provision of funding, guidance, technical assistance, and fostering strategic partnerships.

- **ACF's Vision:** Children, youth, families, individuals, and communities who are resilient, safe, healthy, and economically secure.
- **ACF's Mission:** To foster health and well-being by providing federal leadership, partnership, and resources for the compassionate and effective delivery of human services.

**Figure 1: High-Level Organizational Overview of the Administration for Children and Families**





The **Office of Family Assistance (OFA)**, an Office within ACF, administers federal grant programs that foster family economic security and stability, including the Temporary Assistance for Needy Families (TANF) program and the Tribal Temporary Assistance for Needy Families (Tribal TANF) program, Native Employment Works, Healthy Marriage and Responsible Fatherhood grants, Tribal TANF-Child Welfare Coordination grants, and other discretionary grants.

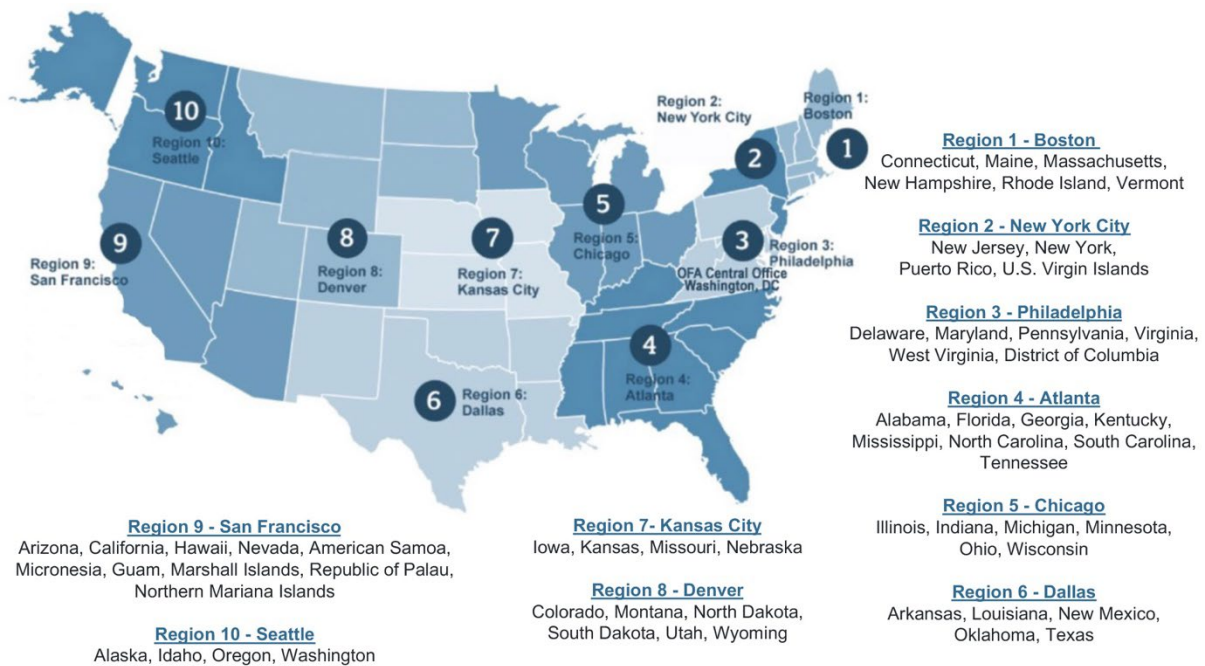
**OFA's top priorities are to:**

- Strengthen TANF as a safety net and work program
- Apply a racial equity lens to our work
- Improve use of, access to, and quality of TANF data to inform program improvement
- Support innovation to improve employment outcomes in TANF and other family strengthening programs

**ACF Regional Offices**

OFA's Central Office is located in Washington, D.C., and there are OFA operations located in the 10 ACF Regional Offices throughout the country.

**Figure 2: ACF Offices**





**The Office of Family Assistance includes the following programs:**

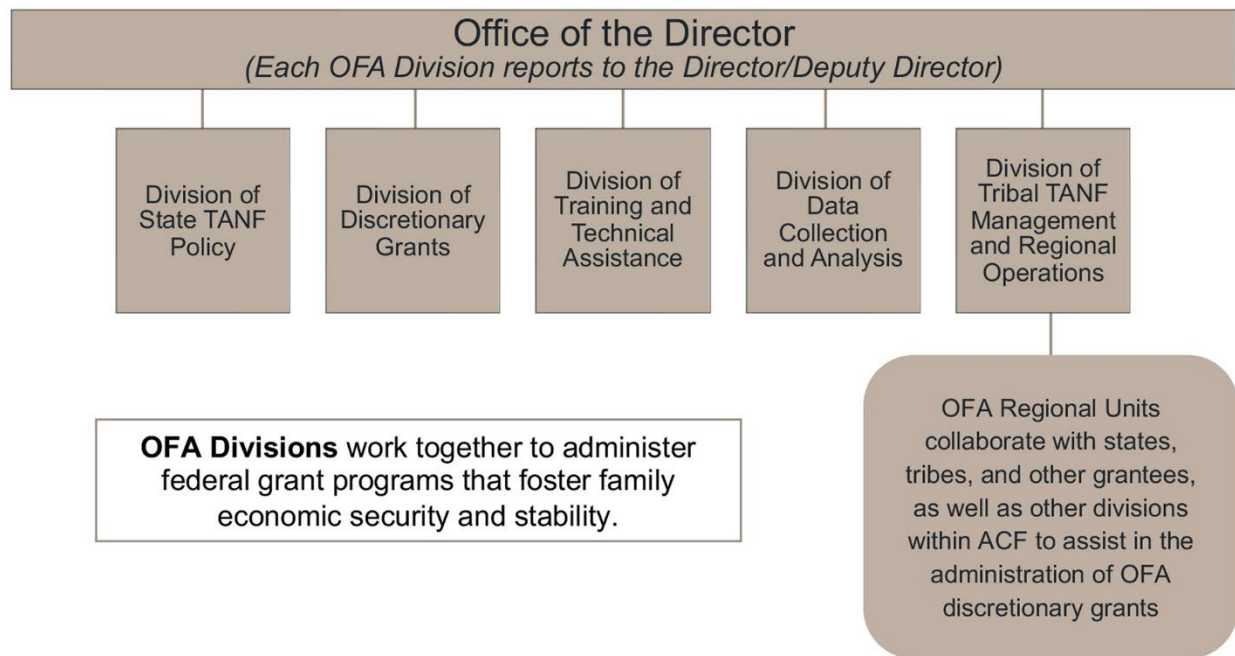
- State TANF
- Tribal TANF
- Native Employment Works (NEW)
- Healthy Marriage and Responsible Fatherhood
- Tribal TANF-Child Welfare Grant Program
- Discretionary grants

**The Office and Divisions within OFA are as follows:**

- Office of the Director
- Division of State TANF Policy
- Division of Data Collection and Analysis
- Division of Discretionary Grants
- Tribal TANF Management and Regional Operations
- Training and Technical Assistance

The following graphic illustrates the organization of the Office of Family Assistance and how OFA works with Regional Offices and technical assistance partners:

**Figure 3: OFA Organizational Structure**



*\*Technical assistance contractors support OFA's TA provision to states and tribes.*

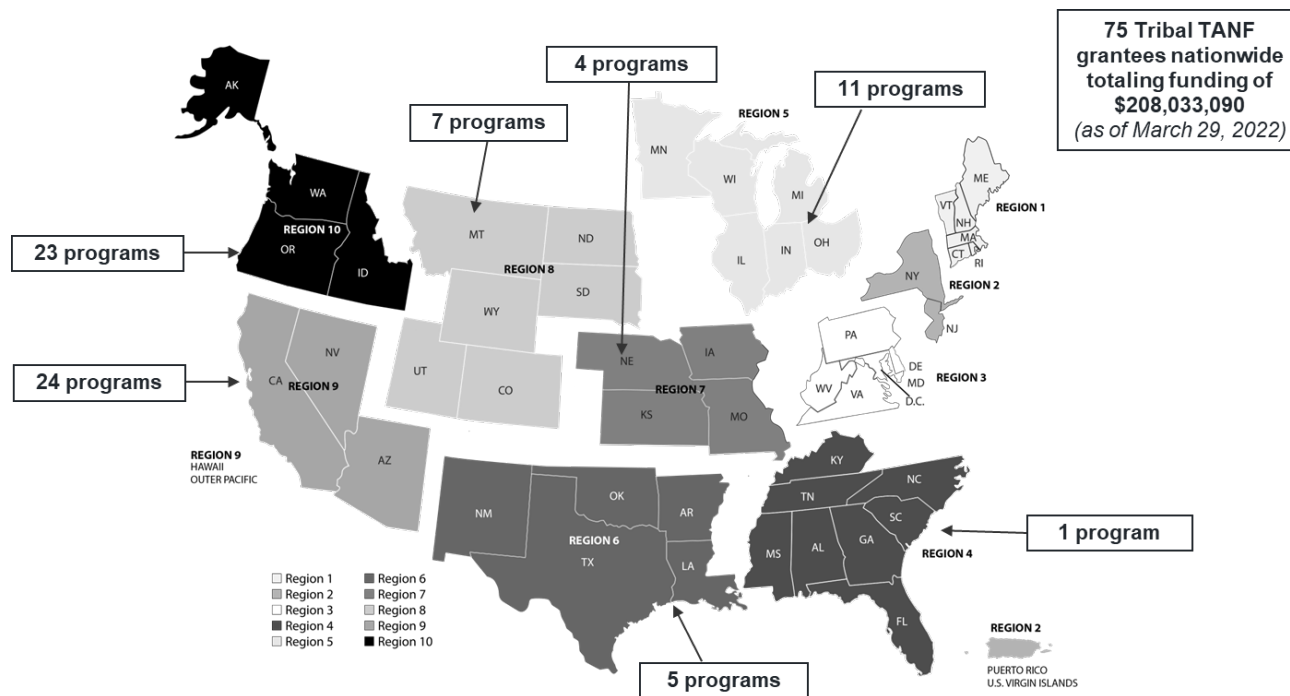
*\*\*Two programs that serve similar populations are administered outside of OFA. Supplemental Nutrition Assistance Program (SNAP) is administered through USDA. Medicaid and the Children's Health Insurance Program (CHIP) are administered through the Center for Medicaid and CHIP Services (CMCS) within the Centers for Medicare & Medicaid Services.*



### Tribal TANF Programs Nationwide:

There are currently 75 Tribal TANF grantees nationwide. See Figure 4 below.

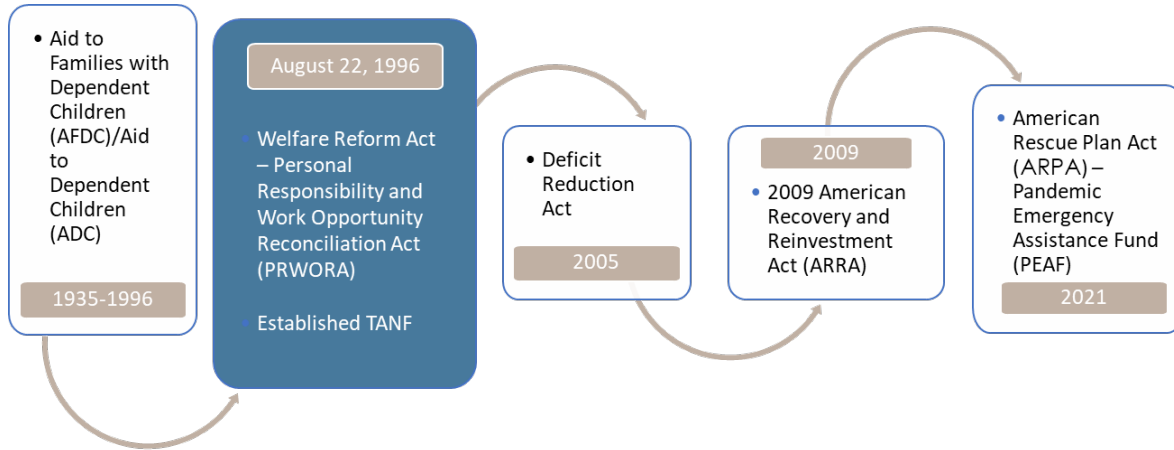
**Figure 4: Map of Existing Tribal TANF Programs (as of March 2022)**





## Historical Background

**Figure 5: History of Federally Funded Social Welfare**



### Personal Responsibility and Work Opportunity Reconciliation Act of 1996

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), often known as "Welfare Reform," is the law that established the TANF program. TANF is a block grant program designed to dramatically reform the nation's welfare system by moving recipients into work and turning welfare into a temporary assistance program. TANF replaced the national welfare program known as Aid to Families with Dependent Children (AFDC) and the related programs known as the Job Opportunities and Basic Skills Training (JOBS) program and the Emergency Assistance (EA) program. PRWORA made several significant changes to America's welfare system, including:

- Replaced the federal-state match under AFDC with the TANF federal block grant with a state maintenance-of-effort (MOE) requirement
- Created Tribal TANF provisions
- Established time limits for families with an adult receiving federally funded assistance
- Included new work requirements
- Outlined penalties for non-compliance with work requirements
- Required cooperation with Child Support Enforcement



## Governing Law, Regulations, Official Guidance, and Resources for Tribal TANF

Section 412 of PRWORA also gave **federally recognized tribes the authority to independently design, administer, and operate their own Tribal TANF programs.**

### Statute, Regulation, Terms and Agreements

- [Title IV-A of the Social Security Act](#)<sup>1</sup> establishes TANF.
- [45 CFR Part 286](#)<sup>2</sup> is the regulatory section governing the Tribal TANF program. The Code of Federal Regulations (CFR) is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal Government.
- [45 CFR Part 75—Uniform Administrative Requirements](#)<sup>3</sup> outlines federal fiscal requirements.
- Grant Terms and Conditions:
  - [Temporary Assistance for Needy Families \(Direct Funded Tribes\)](#)<sup>1</sup>
  - [Temporary Assistance for Needy Families-Pandemic Emergency Assistance Funding \(PEAF\) Terms & Conditions for States, Territories & Tribes](#)
  - [Native Employment Works Program \(Directly Funded Tribes\)](#)

#### Where to Locate Policy Clarifications and Guidance:

- [OFA website](#)
- [OFA Resource Library \(searchable database of guidance\)](#)
- [Peer TA resources](#)
- [The Tribal Programs Policy, Laws, and Guidance web page and the OFA Tribal TANF Guidance Document](#)

<sup>1</sup> [https://www.ssa.gov/OP\\_Home/ssact/title04/0400.htm](https://www.ssa.gov/OP_Home/ssact/title04/0400.htm)

<sup>2</sup> <https://www.ecfr.gov/current/title-45/subtitle-B/chapter-II/part-286/subpart-A>

<sup>3</sup> <https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-75>

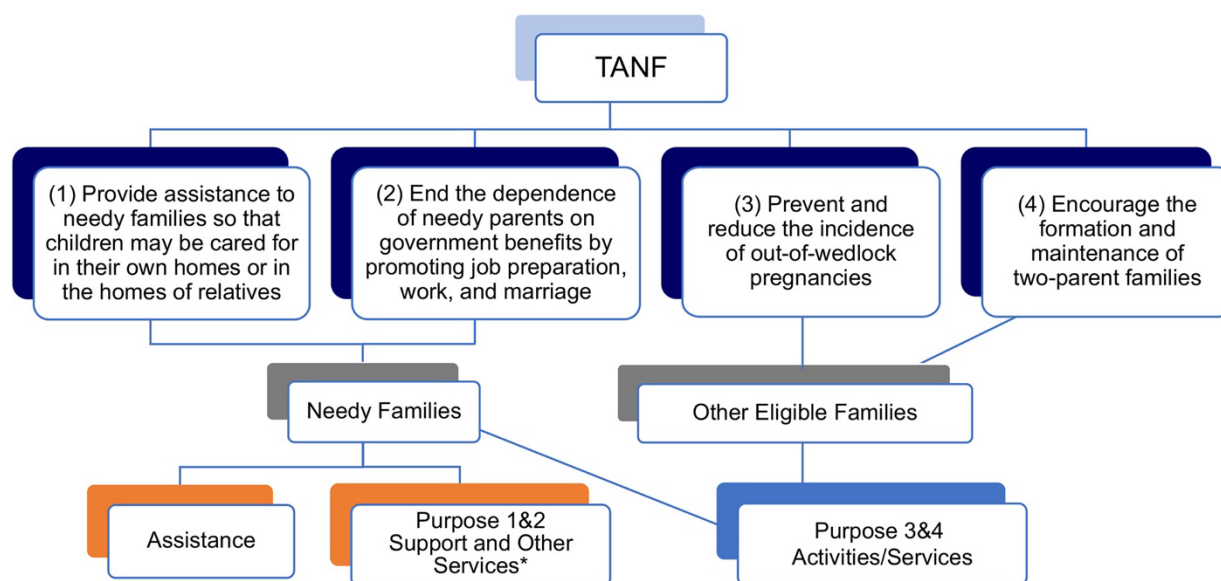
## Key Tribal TANF Program Requirements

Tribal TANF recipients are required to comply with program and fiscal requirements. The following information is provided to bring awareness to the location of key TANF requirements and common questions but is not a comprehensive list of all Tribal TANF regulations.

### Tribal TANF Purposes

Tribal TANF programs deliver services focused on the four purposes of TANF outlined in Section 401 of the Social Security Act.

Figure 6: Tribal TANF Purposes, Populations, and Services



\*This also includes work activities, non-recurrent short-term benefits, refundable tax credits, etc.

Below are additional details and information on each of the four purposes.

- 1 **Purpose 1:** Provide assistance to "**needy**" families so that children may be cared for in their own homes or in the homes of relatives.
  - **Needy Family** – The tribe establishes the income and/or resource standards that define a "needy" family. The tribe's definition of needy family must be included in the Tribal TANF Plan. The tribe may establish a variety of income and resource standards for "assistance" and other services and benefits. Noncustodial parents and/or working parents can be included.
  - **Assistance** – Assistance is defined in regulation. The term "assistance" includes cash, payments, vouchers, and other benefits designed to meet a family's ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses). It includes supportive services such as transportation and



child care to families who are not employed. [§ 286.10 What does the term "assistance" mean?](#)<sup>4</sup>

- 2 Purpose 2:** End the dependence of “**needy**” parents on government benefits by promoting job preparation, work, and marriage.
  - **Needy Parents** – As with Purpose 1, the tribe establishes the income and/or resource standards for “needy” parents. Noncustodial parents can be included.
  - Any activities that promote and/or support job preparation, work, and/or marriage are consistent with this purpose. Examples of support services or activities for Purpose 2 include job or career advancement activities, marriage counseling, financial support for child care services, and employment services (including those intended to increase the noncustodial parent's ability to pay child support).
  
- 3 Purpose 3:** Prevent and reduce the incidence of out-of-wedlock pregnancies.
  - Eligibility for services under Purpose 3 is not limited to families or individuals receiving TANF assistance, nor “needy” families, but can include other eligible families; however, the tribe must establish and implement objective criteria to define what qualifies a family for Purpose 3 services/supports.
  - Examples of support services or activities include sex education programs, teen pregnancy prevention activities, and after-school programs that can be reasonably calculated to reduce the incidence of out-of-wedlock pregnancies.
  
- 4 Purpose 4:** Encourage the formation and maintenance of two-parent families.
  - As was the case with Purpose 3, eligibility for services under Purpose 4 is not limited to families or individuals receiving TANF assistance, nor “needy” families, but can include other eligible families; however, the tribe must establish and implement objective criteria to define what qualifies a family for Purpose 4 services/supports.
  - Examples of support services or activities include healthy relationship classes, couples communication classes, premarital counseling, marriage counseling, initiatives to promote responsible fatherhood, and parenting skills training.

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<sup>4</sup> <https://www.ecfr.gov/current/title-45/section-286.10>



## Tribal TANF Plan

The Tribal TANF Plan is submitted with the initial Tribal TANF application and covers a three-year period. The plan must outline the tribe's approach to providing welfare-related services and include information on work participation requirements. The plan requirements are outlined in the regulation.

**Renewals:** The Tribal TANF Plan must be renewed every three years and approved by OFA before the expiration of the current plan. The plan is submitted under the signature of the Tribal Chairperson or their Designee and must be accompanied by a Tribal Resolution (see 45 CFR 286.70(a)). The plan and accompanying documents (such as assurances and a summary of changes) must be submitted to OFA via the Online Data Collection System (OLDC) (see page 21).

For more information on the Tribal TANF Plan, see:

- [45 CFR Part 286 Subpart C – Tribal TANF Plan Content and Processing](#)
- [Tribal TANF Plan Guidance](#)
- [Tribal TANF Plan Requirements](#)

**Amendments:** The Tribal TANF Plan may be amended to reflect program service and policy changes. Amendments must be submitted at least 30 days before the proposed implementation start date, and all amendments are approved for the first day of the month.

## TANF Eligibility

There are several components of eligibility for participation in Tribal TANF, as outlined in 45 CFR Part 286.10, 45 CFR Part 286.20, and 45 CFR Part 286.75.

- **Service Area** – The Service Area is proposed in the tribe's Letter of Intent (LOI), as well as in the caseload determination and plan approval processes. Once established, the Service Area cannot be altered without approval from OFA. See [TANF-ACF-PI-2018-02 \(revises and supersedes TANF-ACF-PI 2005-03\)](#) for more information.<sup>5</sup>
- **Service Population** – The Service Population is defined by the tribe in the TANF Plan and includes a definition of "Needy" and "Indian Family." If the tribe would like to serve non-Indians, they must secure approval from the state.
- **Individual Eligibility** – An individual must meet the tribe's definition of an Indian family (unless the tribe has the approval to serve non-Indians, as mentioned above) to receive services through the Tribal TANF program.
- **Income Thresholds** – Only families who meet the eligibility criteria determined by the tribe and contained in the Tribal Family Assistance Plan (definition of "Needy" and "Indian Family") may receive assistance. Families who do not meet this income threshold may receive other TANF services under Purposes 3 and 4 and non-recurrent short-term benefits based on separate eligibility criteria appropriate for the service.

## Work Participation Requirements

The work participation requirements reflect the strong focus in PRWORA on moving recipients to work and self-sufficiency.

<sup>5</sup> <https://www.acf.hhs.gov/ofa/policy-guidance/tanf-acf-pi-2018-02-revises-and-supersedes-tanf-acf-pi-2005-03>



Each Tribal TANF program (in negotiation with and approved by OFA) sets **minimum work participation requirements** that must be outlined in the approved Tribal Family Assistance Plan (TFAP) (*see 45 CFR Part 286.80 for more information*) and include:

- The work participation rate for **all** families (or one- and two-parent families); and
- The minimum number of hours per week that adults are required to participate in work activities.

**Factors to consider when proposing Work Requirements:**

- Are the requirements consistent with the economic conditions and resources of the Tribe?
- Are the requirements consistent with the purposes of TANF?

***Individual Work Requirements for Participants: Sanctions, Exemptions, and Good Cause***

Recipients, with few exceptions, must engage in an approved Tribal TANF work activity as soon as they are job ready or face possible sanction or termination of benefits.

Tribal TANF programs can waive work participation requirements for certain individuals based on specific circumstances, meaning that the individual will not be penalized for failure to engage in work. However, these TANF families will be included in the work participation rate calculation. The reasons a tribe may grant an “**exemption**” must be specified in the negotiated Tribal TANF plan. Reasons may include:

- Victims of domestic violence (45 CFR 286.140(a)(3));
- Single custodial parent with a child under the age of six who is unable to obtain acceptable child care (45 CFR 286.150(a)); or for
- Good cause as defined in the approved Tribal TANF Plan (45 CFR 286.135(a)(3)).

In the absence of good cause, tribes determine sanction policies for individuals who refuse to engage in work activities. Penalties are noted in the Tribal TANF Plan (45 CFR 286.135(a)(1)).

***Work Activities that Count Towards WPR***

45 CFR 286.100 outlines several work activities that count towards the WPR. For Tribal TANF programs, **allowable work activities** include:

- (1) Unsubsidized employment;
- (2) Subsidized private sector employment;
- (3) Subsidized public sector employment;
- (4) Work experience;
- (5) On-the-job training (OJT);
- (6) Job search and job readiness assistance; (within the limitations noted at 286.105)
- (7) Community service programs;
- (8) Vocational educational training; (within the limitations noted at 286.105)
- (9) Job skills training directly related to employment;
- (10) Education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency;
- (11) Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, if a recipient has not completed secondary school or received such a certificate;



(12) Providing child care services to an individual who is participating in a community service program; and

(13) Other activities that will help families achieve self-sufficiency

Common examples include:

- Subsidized employment with a local employer (e.g., Parks and Rec)
- Work experience within a tribal office or enterprise
- Career pathway activities offered through local community college
- Health care certificate programs
- GED completion activities
- Participation in training or activities that increase or provide for an individual's readiness for the job market (counseling, life skills, etc.)
- Volunteer work for community garden maintenance
- Small business training/entrepreneurship that can lead to self-employment
- Traditional subsistence activities (e.g., hunting, fishing, gathering, farming, herding, etc.) that result in meeting a basic need or the development of employable skills, with limitations
- Traditional work activities (e.g., pottery making, weaving, wood carving, jewelry making, etc.) that result in meeting a basic need or the development of employable skills, with limitations

### ***Calculating the Work Participation Rate for the Tribal TANF Program***

A simple description of the calculation of the Tribal TANF Work Participation Rate is to divide the number of families receiving TANF assistance (that include an adult who is meeting the work requirements) by the number of families that include an adult receiving TANF assistance, as illustrated in the following graphic. For more information, See 45 CFR 286.85(c).

**Figure 7: Work Participation Rate Calculation**

$$\text{WPR} = \frac{\text{Number of families receiving TANF assistance that include an adult who is meeting work requirements}}{\text{Total number of families that include an adult receiving TANF assistance}}$$

45 CFR 286.85(c)



### ***Disregards from Work Participation Rate***

Certain participants are “**disregarded**” from the work participation rate, meaning that the TANF family is not included in the calculation of the work participation rate. These “disregards” include:

- Families with a child under 12 months
- Individuals that are required to participate but are not participating; and sanctioned for the reporting month but not sanctioned for more than three months within the preceding 12-month period

### ***Fiscal Penalties for Tribes Failing to Meet Work Participation Requirements***

Tribes are subject to fiscal penalties if they fail to meet the minimum work participation rate(s) established in their approved TFAP. If tribes fail to meet their negotiated WPR and a penalty is assessed, they may dispute the penalty, provide a reasonable cause, or establish and complete a corrective compliance plan. See 45 CFR 286.195 thru 286.240 for additional information.

### **Time Limits on Assistance and Exemptions**

Eligibility for TANF assistance (as defined at 45 CFR 286.115) is time limited. The regulations require that tribes propose time limits reflecting Congress's intent that TANF should be temporary. Time limits, exceptions to time limits, and the percentage of the caseload to be exempted from the time limit due to hardship must be included in the tribe's TANF plan (45 CFR 286.115 & 286.120). Tribes must count all prior months of federally funded TANF assistance received, **except** any month exempted by statute or regulation (45 CFR 286.125).

The following are **required exemptions** from the time limit requirement:

- Cases that do not include an adult head of household (child-only cases); and
- Cases in which the adult lived in Indian Country or in an Alaskan Native Village where at least 50% of the adults were not employed.

Additionally, tribes have the **option to make exceptions** to the established time limit for families for the following reasons (45 CFR 286.115 - 286.120):

- **Hardship**, as defined by the tribe. If the tribe elects to offer hardships, they can offer this option to up to 20% of the caseload (the tribe can negotiate a higher rate with a rationale). Hardship must be defined in the Tribal TANF Plan.
- Cases where the family includes someone who has been battered or subject to extreme cruelty.

### **Key Fiscal Requirements**

Tribal TANF fiscal regulations are located at 45 CFR Part 75, and there are a few additional regulations at 45 CFR Part 286 with fiscal implications.





## Fiscal Requirements Located in 45 CFR Part 286

### ***Allowable Use of TANF Funds (45 CFR 286.35)***

Expenditures that are reasonably calculated to accomplish the purposes of TANF are allowable, including but not limited to:

- The provision to low-income households of assistance in meeting home heating and cooling costs
- Assistance in economic development and job creation activities
- The provision of supportive services to assist “needy families” to prepare for, obtain, and retain employment
- The provision of supportive services to prevent out-of-wedlock pregnancies, and assistance in keeping families together

### ***Improper Uses of TANF Funds (45 CFR 286.45)***

A tribe **may not** use Tribal Family Assistance Grant (TFAG funds) to provide assistance to families and individuals who:

- Do not meet the eligibility criteria in the TFAP;
- Have exceeded the allowable time limit; or
- Are not citizens of the United States or “qualified aliens.”

Additionally, a tribe **may not** use TFAG funds:

- To contribute to or to subsidize non-TANF programs;
- For the construction or purchase of facilities or buildings; or
- For services or activities prohibited by 45 CFR Part 75, subpart E.

Tribes must use program income generated by TFAG for the purposes of the TANF program and for allowable TANF services, activities, and assistance. All provisions in 45 CFR Part 75 are applicable to the Tribal TANF program.

### ***Administrative Costs (45 CFR 286.5 and 286.55)***

**Administrative costs are** costs necessary for the proper administration of the TANF program, such as personnel costs for accounting, preparation of program plans/budgets/schedules, and fraud and abuse units.

**Administrative costs exclude** the direct costs of providing program services. For example, personnel costs for those staff providing program services (including case management), and information technology systems and computerization needed for tracking and monitoring are excluded from administrative costs.

### ***Four Types of Tribal TANF Penalties (45 CFR 286.195)***

Tribes will be subject to fiscal penalties and requirements for the following:



- (1) If we determine a tribe misused its Tribal Family Assistance Grant funds, including providing assistance beyond the tribe's negotiated time limit;
- (2) If we determine that a tribe intentionally misused its TFAG for an unallowable purpose;
- (3) If we determine that a tribe failed to meet the minimum work participation rate(s) established for the tribe; or
- (4) If a tribe fails to repay a Federal loan provided under Section 406 of the Social Security Act.

## Fiscal Requirements Located in 45 CFR Part 75

### ***Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards (Part 75)***

This Uniform Administrative Requirements was implemented in 2014 and is an authoritative set of rules and requirements for Federal awards that synthesizes and supersedes guidance from earlier OMB circulars. Recipients of Tribal TANF grants are responsible for meeting the fiscal requirements and limitations cited in 45 CFR Part 75. These fiscal requirements and limitations should be consulted when making fiscal decisions. Subpart D—Internal Controls and Subpart E—Cost Principles—are two sections that may be of particular interest for Tribal TANF **program leaders**. *Please note that not all sections of 45 CFR Part 75 are included below.*

- ***Subpart D – Internal Controls (45 CFR 75.303)***

Subpart D establishes that a grantee must:

- Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should comply with the guidance in “Standards for Internal Control in the Federal Government,” issued by the Comptroller General of the United States, or the “Internal Control Integrated Framework,” issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).
- Comply with Federal statutes, regulations, and the terms and conditions of the Federal awards.
- Evaluate and monitor compliance with statutes, regulations, and the terms and conditions of Federal awards.
- Take prompt action when non-compliances are identified, including those from audits.
- Take reasonable measures to safeguard protected personally identifiable information (PII) and other sensitive information.

- ***Subpart E - Cost Principles (45 CFR 75.400)***

These principles must be used in determining the allowable costs of work performed by the non-Federal entity under Federal awards.

- Establishes principles for determining the allowable costs incurred by non-Federal entities under Federal awards.
- Are for the purpose of cost determination.
- Are designed to provide that Federal awards bear their fair share of cost recognized under these principles except where restricted or prohibited by statute.



## Two Common Questions from Cost Principles

### *Prior Approvals*

Tribal TANF programs must receive prior approval for certain expenses. (45 CFR 75.2, 45 CFR 75.407, 45 CFR 75.436, 45 CFR 75.439). Specifically, prior approval is required for:

- The purchase of **capital equipment** with a unit cost of **\$5,000 or more; and**
- **Software purchases equal to or exceed \$5,000** (software is part of the Information Technology system and classified as equipment).

If you do not obtain prior approval, only the depreciation value, based on the equipment's estimated useful life, can be charged annually (to the Federal TANF grant) until the equipment is fully depreciated.

#### Equipment and acquisition costs are defined as follows:

- Equipment means an article of nonexpendable, tangible, personal property having a useful life of more than one year and a unit acquisition cost of \$5,000 or more.
- Acquisition cost means the price of the asset, including the cost to put it into place. Any modifications, attachments, or accessories needed to make the equipment useable are considered part of the purchase

### *Determining Allowable Expenses*

In determining whether or not an expenditure or activity is allowable, a program must consider the fiscal regulation at 45 CFR 75.403 through 75.405:

- Is the expenditure necessary for the performance of the program?
- Is the expenditure reasonable?
- Is the expenditure allocable?
- Is the expenditure allowable?

## What If I Have More Fiscal Questions?

Tribal TANF programs have an assigned ACF Office of Grants Management (OGM) Specialist assigned to their program. Fiscal questions can be posed to the OGM Specialist and the ACF Program Specialist.

You can find answers to common fiscal questions related to program delivery on the OFA website: [Tribal TANF Q&A](#).<sup>6</sup>

## Tribal TANF Reporting Requirements

### Reporting: Program and Fiscal

Tribal TANF programs must submit three reports to OFA. Two reports are related to program delivery, and the third is related to program expenditures: (1) A quarterly data report (program); (2) a quarterly financial report; and (3) an annual report (program). Figure 8 shows the submission deadlines for each of the key reports.

<sup>6</sup> <https://www.acf.hhs.gov/ofa/faq/q-tribal-tanf>



**Figure 8: Summary of Submission Deadlines for Required Reports**

Federal Calendar Quarter	QTR Start:	QTR Ending:	Report Due:	Quarterly Data Report	Quarterly Financial Report	Program Annual Report
QTR 1	Oct. 1	Dec. 31	Feb. 14	X	X	
QTR 2	Jan. 1	Mar. 31	May 15	X	X	
QTR 3	April 1	June 30	Aug. 14	X	X	
QTR 4	July 1	Sept. 30	Nov. 14	X	X	X

- (1) **Quarterly Program Data Report** – Each tribe must collect monthly data and file quarterly program data on individuals and families as follows:
- Disaggregated data collection and reporting for:
    - Families receiving assistance; and
    - Families no longer receiving assistance.
  - Aggregated data collection and reporting for:
    - Families applying for TANF;
    - Families receiving assistance; and
    - Families no longer receiving assistance.

The quarterly data report must be submitted within 45 days following the end of each quarter to [FTANFTribalDataReport@acf.hhs.gov](mailto:FTANFTribalDataReport@acf.hhs.gov).

- (2) **TANF Financial Report (ACF-196T)** - Each tribe must file quarterly fiscal expenditure data via the ACF-196T Financial Report Form. Tribes must report on their use of assistance expenditures (including cash payments and other assistance) and non-assistance expenditures (including administration, systems, and other costs). A tribe must submit a quarterly ACF-196T for each open grant year award regardless of whether it had any expenditures during the quarter. The financial report must be submitted via the OLDC website.

*The ACF-196T report must be submitted within 45 days following the end of each quarter via OLDC.*

- (3) **Annual Report** – The annual report must include the following elements, as outlined in 45 CFR 286.275:
- Definition of each work activity
  - A description of transitional services
  - A description of how the tribe will reduce assistance for individuals who refuse to work without good cause
  - The average number of child care payments
  - A description of any non-recurring short-term benefits
  - A description of the procedures for resolving displacement complaints
  - A description of the procedures and strategies to ensure victims of domestic violence receive services

The Annual Report is due 90 days after the end of the Fiscal Year and must be submitted via OLDC.



## Online Data Collection (OLDC)

### What is OLDC, and How Do I Submit Reports?

The Online Data Collection (OLDC) system is an electronic data collection system for submitting ACF program and fiscal reports and program plans. OLDC is a component of GrantSolutions.

- All ACF reports are required to be submitted electronically
- All Tribal TANF Plans are submitted electronically in the OLDC system and attached to the SF-424M report
- Password and username are required to access OLDC

See 45 CFR 75.342 & 75.341 and 45 CFR 286.265

You can access GrantSolutions [here](#).<sup>7</sup>

Contact your Program Specialist for the most up-to-date OLDC Users Guides and instructions on requesting an account.

## Helpful Tips / Things to Consider

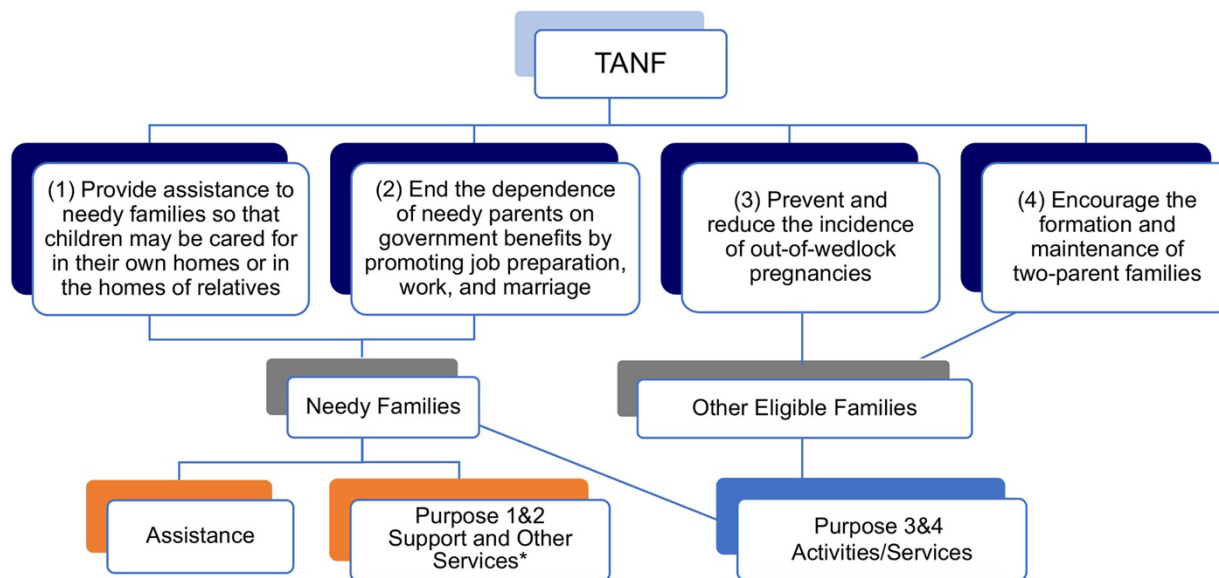
- All services must be reasonably calculated to meet a purpose of TANF
- All services and activities must be included in the Tribe's TANF Plan
- Eligibility must be determined for all services
- Keep good records – document – document – document
- Establish effective communications strategies with your primary partners and collaborators (leadership, OFA, community partners)

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<sup>7</sup> <https://home.grantsolutions.gov/home/>

## Appendix: Tear Away Resources

### Tribal TANF Purposes



\*This also includes work activities, non-recurrent short-term benefits, refundable tax credits, etc.

### Tribal TANF Resources and Sources of Guidance

- [Title IV-A of the Social Security Act](#) establishes TANF.<sup>8</sup> Section 412 of PRWORA also gave federally recognized tribes the authority to independently design, administer, and operate their own Tribal TANF programs.
- [45 CFR Part 286](#) is the regulatory section governing the Tribal TANF program. The Code of Federal Regulations (CFR) is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal Government.<sup>9</sup>
  - Click here for additional information on the [45 CFR Part 286 Subpart C – Tribal TANF Plan Content and Processing](#).<sup>10</sup>
- Recipients of Tribal TANF grants are responsible for meeting the fiscal requirements cited in 45 CFR Part 75, and they should be consulted when making financial decisions. [Click here for more guidance on 45 CFR Part 75](#).<sup>11</sup>

#### Additional general guidance resources:

- [OFA website](#)<sup>1</sup>
- [ACF issued Policy Instruction \(PI\), Policy Announcements \(PA\), and Informational Memorandums \(IM\)](#)<sup>1</sup>

<sup>8</sup> [https://www.ssa.gov/OP\\_Home/ssact/title04/0400.htm](https://www.ssa.gov/OP_Home/ssact/title04/0400.htm)

<sup>9</sup> <https://www.ecfr.gov/current/title-45/subtitle-B/chapter-II/part-286/subpart-A>

<sup>10</sup> <https://www.ecfr.gov/current/title-45/subtitle-B/chapter-II/part-286/subpart-C>

<sup>11</sup> <https://www.ecfr.gov/>



- The [Tribal Programs Policy, Laws, and Guidance web page](#)<sup>12</sup> provides links to resources for a range of Tribal TANF policy documents and forms. Users can also receive guidance regarding Tribal TANF from the [OFA Tribal TANF Guidance Document](#).<sup>13</sup>
- The Tribal TANF Plan may be amended to reflect program service and policy changes. Amendments must be submitted at least 30 days before the proposed implementation start date, and all amendments are approved for the first day of the month. See the following for more information:
  - [Tribal TANF Plan Guidance](#)<sup>14</sup>
  - [Tribal TANF Plan Requirements](#)<sup>15</sup>
- The Online Data Collection (OLDC) system is an electronic data collection system for submitting ACF program and fiscal reports and program plans. OLDC is a component of GrantSolutions.
  - All ACF reports are required to be submitted electronically. All Tribal TANF Plans are submitted electronically in the OLDC system and attached to the SF-424M report.
  - Password and username are required to access OLDC.
  - See 45 CFR 75.342 & 75.341 and 45 CFR 286.265.
  - You can access GrantSolutions [here](#)<sup>16</sup>.
  - Website: <https://home.grantsolutions.gov/home/>
  - Phone: 1.866.577.0771
  - Email: [help@grantsolutions.gov](mailto:help@grantsolutions.gov)
  - Contact your Program Specialist for the most up-to-date OLDC Users Guides and instructions on requesting an account.

**Terms and Conditions:**

- [Temporary Assistance for Needy Families \(Direct Funded Tribes\)](#)<sup>1</sup>
- [Temporary Assistance for Needy Families-Pandemic Emergency Assist. Funding \(PEAF\) Terms & Conditions for States, Territories & Tribes](#)<sup>1</sup>
- [Native Employment Works Program \(Directly Funded Tribes\)](#)<sup>1</sup>

### Required Reports – Submission Deadlines

Federal Calendar Quarter	QTR Start:	QTR Ending:	Report Due:	Quarterly Data Report	Quarterly Financial Report	Program Annual Report
QTR 1	Oct. 1	Dec. 31	Feb. 14	X	X	
QTR 2	Jan. 1	Mar. 31	May 15	X	X	
QTR 3	April 1	June 30	Aug. 14	X	X	
QTR 4	July 1	Sept. 30	Nov. 14	X	X	X

<sup>12</sup> <https://www.acf.hhs.gov/ofa/programs/tribal/policy>

<sup>13</sup> <https://www.acf.hhs.gov/ofa/programs/tribal/policy>

<sup>14</sup> <https://www.acf.hhs.gov/ofa/fact-sheet/tribal-plan-requirements>

<sup>15</sup> <https://www.acf.hhs.gov/ofa/fact-sheet/tribal-plan-requirements>

<sup>16</sup> <https://home.grantsolutions.gov/home/>



## Common Acronyms

- **TANF:** Temporary Assistance for Needy Families
- **ACF:** Administration for Children and Families
- **OFA:** Office of Family Assistance
- **CFR:** Code of Federal Regulations
- **OLDC:** Online Data Collection
- **TFAP:** Tribal Family Assistance Plan
- **WPR:** Work Participation Rate
- **RO:** ACF Regional Office (e.g., ACF Region IX)
- **CO:** OFA Central Office (Washington DC)