



Office of Family Assistance  
Administration for Children and Families  
United States Department of Health and Human Services  
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August 24, 2023

Subject: Response to OMB #0970-0338 proposed changes to TANF Data Reporting

Office of Family Assistance,

This letter is our formal comment to the proposed changes to TANF Data Reporting in OMB #0970-0338. Thank you for the opportunity to respond and we appreciate your effort to improve the instructions and streamline reporting. In your notice of the proposed changes, you specified four specific areas of feedback you were particularly interested in: Necessity, accuracy, the agency's burden estimate, and ways to minimize the burden.

Our primary concern is with the burden of these proposed changes due to what appears to be coding changes of the answers to many questions. See the attached spreadsheet documenting the questions where the coding may be changed. At a high level, a maximum estimate of implementing these changes is 3,500-4,000 IT hours, which implies a cost of up to \$368,000 for the State of Wisconsin to implement. Note:

- 1) This estimate includes only IT staff time for changes to the data extraction process and does not include other staff time that may be needed.
- 2) Our estimates are rather uncertain because we are not clear if coding changes would be required for some items. In the attached spreadsheet, those marked at level 3 appear to require coding changes while some of those marked at level 2 may or may not require coding changes.

Regarding accuracy, we do not anticipate having the new values for Gender soon ("Non-Binary or gender non-conforming", "Uses a different term"), which applies to items TANF Section 1 [#35, #71], TANF Section 2 [#18, #31], SSP-MOE Section 1 [#31, #64], and SSP-MOE Section 2 [#17].

Regarding necessity, the streamlining of the instructions in each section (such as moving some narratives to the appendix) and modernizing terms and language do appear important in improving clarity. However, it is not clear to us that the coding changes are necessary from our point of view. There does not appear to be large gains in data quality nor obvious benefits in our ability to monitor the program and participant outcomes based on the proposed coding changes.

Thus, given the high-cost burden to the State of Wisconsin and without clear benefits to the coding changes, at this time we request that you do not make final the new instructions that result in coding changes.

Again, we greatly appreciate this opportunity to comment on the proposed changes. Thank you.

Sincerely,

DocuSigned by:



*Maggie Renno*

Maggie Renno, Director  
Bureau of Analytics and Research

DocuSigned by:



*Patara Horn*

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