

# OMAHA TRIBE OF NEBRASKA

## Executive Officers

Jason Sheridan, Chairman  
Leander Merrick, Vice-Chairman  
Cheyenne Robinson, Secretary  
Alan Harlan, Treasurer



## Members

Galen Aldrich Sr.  
Jerome Hamilton  
Dustin Lovejoy

## Written Comments on OMB #0970-0215: Extension of Tribal TANF Data Collection Requirements Submitted on behalf of the Omaha Tribe of Nebraska

**Date:** July 25, 2025

**To:** Administration for Children and Families (ACF), U.S. Department of Health and Human Services

**RE:** Proposed 3-Year Extension of the Tribal TANF Data Report, Annual Report, and Reasonable Cause/Corrective Action Documentation Process

**OMB Control Number:** 0970-0215

### Background

The Omaha Tribe of Nebraska appreciates the opportunity to comment on the proposed extension and minor revision of the Tribal TANF data collection instruments. We recognize the importance of responsible program oversight and affirm the responsibility of Tribal TANF grantees to demonstrate accountability and effectiveness. However, we offer the following recommendations to ensure that this data collection process respects Tribal sovereignty, supports administrative efficiency, and aligns with culturally grounded service delivery.

### 1. Support for Continuation with Modifications to Respect Tribal Capacity and Sovereignty

We do not oppose the continuation of these reporting requirements, but we urge ACF to:

- Streamline duplicative or low-value data points that do not meaningfully contribute to performance improvement.
- Work collaboratively with Tribes to identify and elevate meaningful indicators based on Indigenous evaluation methods.
- Recognize that Tribal governments are distinct from states and should not be held to one-size-fits-all federal performance models or punitive measures that may not align with community realities.

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## **2. Recommendations on Data Sovereignty and Use of Disaggregated Data**

We request that ACF:

- Include explicit language in guidance and documentation acknowledging Tribal data sovereignty.
- Ensure that disaggregated data submitted by Tribal TANF programs is not publicly released or used without consent from the reporting Tribe.
- Provide mechanisms for Tribal review and input before any federal agency shares or interprets Tribal TANF data externally (e.g., in national reports or comparative metrics).

## **3. Clarify the Use and Scope of Reasonable Cause and Corrective Action Provisions**

We urge ACF to clarify:

- That corrective action plans should be collaborative, not punitive, and should consider social determinants of health, systemic barriers, and historical inequities impacting service delivery.
- That reasonable cause justifications must be interpreted through a culturally informed, trauma-informed lens that accounts for unique Tribal circumstances.

## **4. Technical Assistance and Capacity Building Support**

The Department should increase resources and TA for Tribal TANF programs to:

- Analyze their own data for program learning and community feedback loops.
- Develop data dashboards or summary tools useful for Tribal Council reporting, interdepartmental coordination, and grant leverage.
- Support interoperability with other Tribal human service systems (e.g., child welfare, workforce development, education).

## **5. Burden Estimation Accuracy**

We request that ACF:

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- Reassess and publicly share the basis for its burden estimates, ensuring that time burdens reflect Tribal program size, staffing constraints, and the nuances of rural vs. urban implementation contexts.
- Consider establishing a small program exemption or reduced reporting option for Tribes with very small caseloads or limited administrative bandwidth.

## 6. Promote Alignment with Tribal TANF Flexibility Goals

Finally, we urge ACF to align reporting guidance with the flexibility promised under Section 412 of the Social Security Act. Tribes must have the discretion to:

- Define “family” and “work participation” in a culturally grounded manner.
- Tailor services and success metrics based on community-defined outcomes—not only those set by state-based TANF frameworks.

## Conclusion

The Omaha Tribe of Nebraska supports the continued implementation of Tribal TANF with an emphasis on accountability, community empowerment, and Tribal self-governance. We appreciate the proposed formatting improvements and urge ACF to take further steps to reduce the administrative burden, enhance Tribal data sovereignty, and align this reporting process with the unique structures and values of Tribal Nations.

We stand ready to work with ACF in a government-to-government manner to co-design policies and practices that uphold our inherent sovereignty and meet the needs of Native children and families.

  
Cheyenne Robinson, Secretary  
Omaha Tribe of Nebraska