ADMINISTRATION FOR CHILDREN & FAMILIES
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Tribal TANF Sanction Reporting: Reviewing Errors and Planning Corrections

Guidance for Tribal TANF programs and their case management system vendors

Background

Recent Tribal TANF work participation rate (WPR) feedback has identified errors in how work-related sanctions are reported. During a recent office hours session with ACF, several Tribal TANF program partners indicated that these errors may be related to how their case management systems prepare data for federal reporting. Partners also noted that these errors may be connected to retrospective budgeting, where a reduction in assistance can take effect a few months after the month of noncompliance. Because these errors may affect WPR calculations, ACF is asking affected programs to work with their vendors, as applicable, to determine the cause of these errors and identify the changes needed to ensure accurate reporting.

Federal Reporting Guidance

For federal reporting purposes, work-related sanctions should be reported for the month(s) in which the sanction is in effect, rather than an earlier month when the noncompliance occurred. Programs may have their own methods for tracking noncompliance and sanctions in their case management systems, but the data submitted to ACF must accurately reflect when the work sanctions were applied to a family's case.

- **For cases that have a work-related sanction and remain open**: Use Section 1 to report the sanction for the month(s) assistance is reduced.
- **For cases that close because of a work-related sanction:** Use Section 2 for the last month the family received assistance and select the work-related sanction closure reason.

Programs and vendors should review Reporting Work Sanctions in Active and Closed Case Data (pages 22-24 of the Tribal TANF WPR Feedback Reference Guide) for detailed guidance and reporting examples.

Understanding Errors and Planning Corrections

Affected Tribal TANF programs and their vendors, as applicable, should work together to:

- Review work-related sanction errors identified in the program's **WPR Errors Report**.
- Determine the cause of these errors and whether changes to the case management system or reporting processes are needed.
- Identify which reporting periods are affected.
- Develop a plan and estimated timeline for making corrections.
- Identify any questions or challenges that may require additional guidance from ACF.

Keep ACF Informed

To help ACF better understand the scope of these reporting issues and inform next steps, affected programs should share the following information by **February 1, 2027:**

- Whether changes to the case management system are needed.
- The name of the case management system vendor, if applicable.
- Planned corrections and anticipated timelines.
- Any outstanding questions or challenges that may require additional federal reporting guidance.

Programs should share their findings even if no system changes are needed. Please email your responses to the TANF data team, and copy your regional program specialist and, if applicable, your program's BIA Awarding Official Technical Representative (AOTR).

Support From ACF

ACF's TANF data team is available to clarify federal reporting requirements and answer questions that arise during the review process.

Please e-mail us at TANFData@acf.hhs.gov or schedule a one-on-one session. Bring your questions and your program's system vendor.

Learn more: Tribal TANF WPR Feedback Reference Guide