

Temporary Assistance for Needy Families (TANF) Systems of Records Change (SORN)

Deadline to Submit Comments (extended): Tuesday, August 11th, 2026

On June 23rd, HHS's Administration for Children and Families (Office of Family Assistance) released an updated "system of records" notice ([SORN 09-80-0375](#)) related to TANF (Temporary Assistance for Needy Families) client data collected from state, territorial, and Tribal grantee agencies. The SORN expands HHS's ability to verify and cross-check TANF recipient data collection with other federal agency data. It **does not** directly change eligibility or require additional information collected from non-recipient caregivers in TANF child-only households, but Generations United is concerned about how states may interpret these requirements and is seeking clarification to help ensure TANF access for kinship families is not impacted.

Generations United encourages comments from kinship caregivers and advocates to raise awareness about importance of TANF child-only for children raised by grandparents and other relative caregivers outside of the foster care system.

Attached in this comment guide is 1) a summary of proposed changes, 2) points of concern to raise in comments, 3) templates for kinship caregivers and advocates to submit comments that you can personalize.

Summary of TANF Systems of Records (SORN) Changes

The SORN updates TANF systems of records to expand HHS's ability to verify and cross-check TANF recipient data collection with other federal agency data and formalizes sharing of that data for program-integrity and compliance purposes. Generations United is seeking clarification to inform states that new agency TANF records sharing does not require additional information collection from non-recipient household members where children are applying for TANF child-only grants.

Key changes in the SORN include:

- **Requires states to share available TANF grantee information with federal agencies** including income, employment status and work hours, citizenship verification, and more. The SORN permits ACF to disclose records to other federal or grantee agency/entity (e.g., DHS or TANF program administrators) engaged to help verify grantee compliance and program integrity, including verifying citizenship or immigration status. The SORN also adds "other HHS records" and "other federal or state agencies/entities" as sources of information in the system. Social Security numbers were also added as an identifier used to retrieve verification information. For TANF child-only cases, this information is not required to be collected from non-recipient caregivers and should not be used to determine children's eligibility for TANF child-only grants.
- The SORN also **directs HHS to monitor TANF grantee information** and share records with other federal agencies to help ensure program integrity and compliance with TANF work requirements and time limits. It is important to make clear that income, work requirements, and time limits are not applicable or appropriate in child-only TANF cases. Collecting this information may lead to wrongful denials. The SORN refines eligibility-verification purpose of TANF data and adds a

new stated purpose: “HHS oversight activities” (program integrity reviews, audits, monitoring) to confirm TANF grantees comply with TANF rules. This explicitly includes verifying recipients’ citizenship/immigration status against Department of Homeland Security (DHS) and US Citizenship and Immigration Services (USCIS) records.

Overview of Generations United’s Concerns About TANF Access for Kinship Families

Temporary Assistance for Needy Families is often the only form of financial support for children raised in kinship care outside of the foster care system. While much of the nation’s TANF caseload consists of TANF child-only grants to children being raised by relatives, the program remains underutilized by kinship families largely due to ongoing barriers. Only about 13 percent of children in kinship families receive TANF child-only, despite most being eligible, since these grants are designed to consider only the child’s income. Many eligible children do not access or receive this support because their caregivers and TANF agency staff often do not know about TANF child-only grants. Even if they do, the application process is typically confusing and poses barriers to families, making child-only difficult to access.

Given the challenges and barriers many kinship families face trying to access TANF child-only grants currently, Generations United is concerned about TANF agencies’ interpretation of the new TANF system of records (SORN) changes and its potential implications for kinship families seeking assistance for the children in their care. Without clear guidance, states may interpret the notice differently, which could lead to inconsistent documentation requests, delays, or confusion for eligible child-only TANF cases.

Generations United urges comments that provide insight into challenges kinship families experience when applying for TANF child-only grants and recommendations to address those barriers and ensure the SORN does not exacerbate barriers.

The SORN requires states to share available TANF grantee information with federal agencies including income, employment status and work hours, citizenship verification, and more. For TANF child-only cases, this information is not required to be collected from non-recipient caregivers and should not be used to determine children’s eligibility for TANF child-only grants. However, many TANF agency staff are not informed of TANF child-only eligibility requirements or how to process child-only applications differently from TANF family grants. Stories abound from kin caregivers being turned away and denied this support.

It is important to make clear that income, work requirements, and time limits are not applicable or appropriate in child-only TANF cases. Collecting this information may lead to wrongful denials and would add additional barriers to TANF for children in kinship care. Families should not experience automatic denials, closures, or delays based solely on a data mismatch that may be incorrect or outdated. They should receive notice, human review, and a meaningful opportunity to correct inaccurate information before any denials or adverse action is taken.

Further, families may give up on trying to apply for TANF if the process is daunting or feels too intrusive. The collection of additional information could create an excessive administrative burden for caregivers who are already overwhelmed with caring for children.

Generations United seeks clarification from the Administration for Children and Families (ACF), Office of Family Assistance (OFA) to ensure that states have clarity that additional information collection in TANF child-only cases are not required. Program integrity is important, but it should not unintentionally prevent eligible children from receiving support intended to help them remain safely with family.

Additional Recommendations to Support TANF Access for Kinship Families:

- TANF agencies are encouraged to provide training to staff on eligibility for child-only TANF vs. TANF family grants and consider having designated child only TANF staff to handle relevant applications. Encourage TANF agencies to partner with a trusted community-based organization serving kinship families and place a TANF worker at their location.
- States are encouraged to provide accurate information about child only TANF on their websites which explains eligibility requirements, which information is and is not collected on applications, and how to apply.
- States are encouraged to offer an easy-to-complete child only application which only collects required information and is separate from the TANF family grant application. In most states, families must apply for child-only grants using the TANF family grant application process. Family grant applications ask for caregiver income information, employment and work status, asset, and other information not required for TANF child-only grants. To apply for the child-only grant, caregivers need to know which fields to complete on the family grant application, and which to ignore.
- TANF agencies should offer an option to apply for TANF child only grants in person and ensure that any digital application includes a clear path to apply for TANF child only grants.
- TANF agencies should consider including kinship caregivers as advisors on developing and improving their TANF application processes.
- Encourage states to consider making TANF child only grant available to non-related (“fictive”) kin who can demonstrate they are providing full-time care for a child.
- Encourage states to address barriers to TANF related to the requirement for caregivers to assign the right to collect child support to the state and support communications which convey effective use of the good cause exemption.

How to Submit Your Comments

Online (preferred): [regulations.gov/document/ACF-2026-0727-0001](https://www.regulations.gov/document/ACF-2026-0727-0001) (or use the comment link on the [Federal Register](#) page)

Mail: John Talieri, Senior Official for Privacy, Administration for Children and Families, 330 C Street SW, Washington, DC 20201 — include "**09-80-0375**" in the subject line

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Note for template comments: It is important to personalize the comments so that they each are individually considered and require a response from the agency. Comments that are too similar to other comments can be dismissed more easily by the agency.

Template Comment for Kinship Caregivers

Note for template comments: Fill in the bracketed sections, delete instructions in italics, and submit through either channel above. Personalize your comments to share your unique perspective and concerns. This helps ensure comments are individually considered. Please edit as you see fit- you do not need to include all the language in the template. Any and all comments from kinship families are helpful to raise awareness, even if brief. Comments are posted publicly, so avoid including personal identifying information you don't want made public.

To the Administration for Children and Families, Office of Family Assistance:

I am submitting this comment on the modified TANF System of Records Notice (SORN 09-80-0375), published June 23, 2026.

[Briefly introduce yourself — e.g., "I am a grandmother raising my two grandchildren" or "I am a kinship caregiver in [state]."]

Thank you for your commitment to families and the opportunity to share about the critical role Temporary Assistance for Needy Families (TANF) plays in the lives of grandparents, other relatives and close family friends raising children, also known as grandfamilies or kinship families. For many grandfamilies, TANF is the only source of support to help meet the children's basic needs.

Grandparents and other relatives often step into their caregiving role unexpectedly and struggle financially to provide for children they did not plan or expect to raise. *[If applicable, add your grandfamily/kinship experience and connection to TANF, e.g.: "When I took on the responsibility of caring for my grandchildren, I was overwhelmed and didn't know how I was going to make ends meet. TANF has been critical in helping us put food on the table and meet the children's needs."]*

I am concerned about how this SORN change may affect kinship families like mine who need the support of TANF child-only grants to meet children's basic needs. Child-only TANF is meant to be based only on the child's own income and eligibility — not on the caregiver's income, employment, work hours, or citizenship/immigration status. If this information is required to be collected, the process to get support becomes more challenging and kinship families are more likely to be wrongly denied TANF child-only for the children in their care.

[If applicable, add your own experience about TANF, e.g.: "When I applied for child-only TANF, I had to fill out a 15+ page application that was hard to understand." / "Caseworkers asked me for my income and work history, even though I was told this shouldn't apply to my case." / "I was initially denied assistance for my grandchild because TANF agency staff didn't understand child-only eligibility rules." / "The application process was confusing, and I almost gave up trying to get help for my grandchild."]

Temporary Assistance for Needy Families is often the only form of financial support for children raised in kinship care outside of the foster care system. While much of the nation's TANF caseload consists of TANF child-only grants to children being raised by relatives, the program remains underutilized by kinship families largely due to ongoing barriers. Only about 13 percent of children in kinship families receive TANF child-only, despite most being eligible, since these grants are designed to consider only the child's income. Many eligible children do not access or receive this support because their caregivers and TANF

agency staff often do not know about TANF child-only grants. Even if they do, the application process is typically confusing and poses barriers to families, making child-only difficult to access.

Given the challenges and barriers many kinship families face trying to access TANF child-only grants currently, I am concerned about TANF agencies' interpretation of the new TANF system of records changes and its potential implications for kinship families seeking assistance for the children in their care. Without clear guidance, states may interpret the notice differently, which could lead to inconsistent documentation requests, delays, or confusion for child-only TANF cases.

I urge ACF/OFA to **clarify in writing** that this data collection and new data reporting use do not apply to non-recipient caregiver information in child-only TANF cases, since income, work requirements, time limits, and other non-recipient information are not eligibility factors for those cases. It is critical to make clear that states are not required to collect additional non-recipient information for child-only TANF cases. Many caregivers are already stretched thin caring for children unexpectedly- collecting unnecessary information only makes it harder to get help that the children need.

I also encourage ACF/OFA to work with states to address barriers to TANF for kinship families. This includes:

- Ensure state TANF agencies are properly trained on child-only eligibility rules so caregivers are not wrongly asked for information that isn't required, or wrongly denied.
- Encourage states to publish clear, accurate public information on child-only eligibility on state TANF websites, what information is and is not required, and how to apply.
- Encourage states to develop a separate, streamlined child-only application that does not require caregiver income, employment, or asset information.
- Request states offer both in-person and digital application paths for child-only grants. Encourage TANF agencies to partner with a trusted community-based organization serving kinship families and place a TANF worker at their location.
- Encourage states to include kinship caregivers as advisors in the design of TANF application processes.
- Encourage states to address barriers to TANF related to the requirement for caregivers to assign the right to collect child support to the state and support communications which convey effective use of the good cause exemption.

Thank you for considering this comment.

[Name]

[City, State]

Template Comment for Kinship Programs & Advocates

Note for template comments: Fill in the bracketed sections, delete instructions in italics, and submit through either channel above. Personalize your comments to share your unique perspective and concerns. This helps ensure comments are individually considered. Please edit as you see fit- you do not need to include all the language in the template. Any and all comments from kinship programs and advocates are helpful to raise awareness, even if brief. Comments are posted publicly, so avoid including personal identifying information you don't want made public.

To the Administration for Children and Families, Office of Family Assistance:

[Organization name] submits this comment on the modified TANF System of Records Notice (SORN 09-80-0375), 91 FR 37406, published June 23, 2026.

Thank you for your commitment to families and the opportunity to submit written testimony about the critical role Temporary Assistance for Needy Families (TANF) plays in the lives of grandparents, other relatives and close family friends raising children, also known as grandfamilies or kinship families. For many grandfamilies, TANF is the only source of support to help meet the children's basic needs.

I am concerned that the proposed system of records notice could unintentionally create additional barriers for eligible children in child-only TANF cases, particularly children being raised by kinship caregivers.

[If applicable, add your personal/organization perspective, eg: "[Organization name] supports kinship families in [STATE]... We see the critical importance of TANF for kinship families in our everyday work."]

Grandparents and other relatives often step into their caregiving role unexpectedly and struggle financially to provide for children they did not plan or expect to raise. Currently 2.5 million children across the US benefit from the sacrifices of grandparents, other relatives, or close family friends, and they thrive in this loving care.

Temporary Assistance for Needy Families is often the only form of financial support for children raised in kinship care outside of the foster care system. While much of the nation's TANF caseload consists of TANF child-only grants to children being raised by relatives, the program remains underutilized by kinship families largely due to ongoing barriers. Only about 13 percent of children in kinship families receive TANF child-only, despite most being eligible, since these grants are designed to consider only the child's income. Many eligible children do not access or receive this support because their caregivers and TANF agency staff often do not know about TANF child-only grants. Even if they do, the application process is typically confusing and poses barriers to families, making child-only difficult to access.

[If applicable, add your own experience or organization perspective, eg: "[Organization name] supports kinship families in applying for TANF child-only grants for the children in their care and see caregivers face barriers regularly. For example, when information is collected about caregiver income, caregivers assume they will be denied and it stops them from bothering to complete the application. They are already too overwhelmed with caring for a child with complex needs."]

Given the challenges and barriers many kinship families face trying to access TANF child-only grants currently, **[I am/[organization name] is]** concerned about TANF agencies' interpretation of the new TANF

system of records changes and its potential implications for kinship families seeking assistance for the children in their care. Without clear guidance, states may interpret the notice differently, which could lead to inconsistent documentation requests, delays, or confusion for child-only TANF cases.

Requested clarification on SORN:

ACF/OFA should issue clear written guidance confirming that the expanded data collection, verification, and new routine use do not apply to non-recipient caregiver information in TANF child-only cases, and that income, work participation, and time-limit requirements are not applicable to child-only eligibility determinations. Many TANF agency staff are not informed of TANF child-only eligibility requirements or how to process child-only applications differently from TANF family grants.

Additional Recommendations to Improve TANF Access for Kinship Families

ACF/OFA should strongly encourage states to:

- Train eligibility staff on the distinction between TANF family grants and TANF child-only grants.
- Publish clear, accurate public information on child-only eligibility on state TANF websites, what information is and is not required, and how to apply.
- Develop a separate, streamlined child-only application that does not require caregiver income, employment, or asset information.
- Offer both in-person and digital application paths for child-only grants. Encourage TANF agencies to partner with a trusted community-based organization serving kinship families and place a TANF worker at their location.
- Include kinship caregivers as advisors in the design of TANF application processes.
- Address barriers to TANF related to the requirement for caregivers to assign the right to collect child support to the state and support communications which convey effective use of the good cause exemption.

We appreciate the opportunity to comment and welcome further dialogue with ACF/OFA on implementation guidance that protects kinship families' access to TANF child-only support.

[Organization name]

[Contact name]

[City, State]