



January 19, 2023

The Honorable Bill Lee
Governor of Tennessee
Tennessee State Capitol
Nashville, TN 37243-0001

Dear Governor Lee:

On March 11, 2022, Tennessee submitted a modification to the program year 2020 Workforce Innovation and Opportunity Act (WIOA) combined state plan to the U.S. Departments of Labor, Education, and Health and Human Services for approval. The state received a joint-agency email on June 6, 2022, informing it that the Departments of Labor and Education had approved their portions of the combined plan.

The email noted that the Department of Health and Human Services would make a separate determination in accordance with section 103(c)(3)(B) of WIOA regarding the program-specific requirements of the combined state plan governing the Temporary Assistance for Needy Families (TANF) program.

You have asked us to consider this modification to be a TANF plan renewal. Although the combined state plan subsumes the TANF state plan, the underlying TANF plan requirements in section 402 of the Social Security Act continue to apply. Thus, to remain eligible for TANF and continue to receive federal funds under the TANF program, Tennessee must ensure that its WIOA combined plan submission and amendments meet the time frames established in section 402(a) as well. This requires the state to submit a plan that contains all the necessary elements listed in section 402 of the Social Security Act, including the certifications specified under sections 402(a)(2)-(7).

We wrote to the state on July 7, 2022, indicating that the TANF-specific portion of its plan was missing some critical information regarding: the state's statutory rape program; EBT brochures and ensuring access to benefits with minimal fees; how hearing and appeals process will be conducted for adversely affected recipients; and providing a clear explanation of and financial eligibility criteria for each of its maintenance-of-effort-funded programs. On October 25, 2022, the state submitted a revised plan that included the missing information. It also notified us of its intention to submit the new Intimate Partner Violence (IPV) certification and language to include a one-time cash payment to families receiving Families First/TANF to assist them in overcoming temporary hurdles, in its plan renewal.

On December 13, 2022, the state submitted a revised plan that included the addition of the IPV certification and one-time payment to families. We have reviewed the revised plan and have

determined it to be complete. Because the combined state plan subsumes the individual TANF state plan, the state should not submit a separate TANF state plan. The Secretary of Health and Human Services makes a finding of plan completeness but does not approve or disapprove a plan. Therefore, you should not construe this determination of completeness as an approval of any particular activity or as a determination that any particular expenditure is an allowable use of TANF/maintenance-of-effort funds.

I am pleased to inform you that, as of July 1, 2022, Tennessee continues to qualify as an eligible state under the TANF program, per section 402 of the Social Security Act. Accordingly, Tennessee is entitled to an annual State Family Assistance Grant of \$190,891,768.

If you have any questions about the information in this letter, please contact Ms. LaMonica Shelton, the TANF Program Manager for Region IV, at (404) 562-2938 or LaMonica.Shelton@acf.hhs.gov.

Sincerely,

Ann Flagg
Director
Office of Family Assistance

cc: Clarence H. Carter, Commissioner, Tennessee Department of Human Services
Lakecia Peterson, Interim Director, Families First