

To: Administration of Children and Families
Department of Health and Human Services

From: National Association of Evangelicals

Date: Friday, December 1, 2023

RE: Strengthening Temporary Assistance for Needy Families as a Safety Net and Work Program
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Thank you for the opportunity to comment on the proposed revisions to regulations governing the Temporary Assistance for Needy Families (TANF) program. The National Association of Evangelicals, representing a broad network of evangelical Christian denominations, churches, schools, charities, and ministries has long supported sound and well administered social safety net programs, including TANF.

One of our core principles is seeking justice and compassion for the poor and vulnerable. We believe that “God measures societies by how they treat the vulnerable and powerless.”¹To this end, we believe that “adequate funding for food, shelter and health care should be maintained so that those who cannot care for their families and themselves receive the support they need.”²

We offer two specific comments on the proposed rule as noted below:

Comment on Proposed Provision #1: Establish a ceiling on the term “needy” so that it may not exceed a family income of 200 percent of the federal poverty guidelines.

The National Association of Evangelicals applauds the proposal to target assistance to the families in greatest need of assistance. Defining as “needy” those families with income at or below 200% of the federal poverty guidelines is a reasonable standard.

Comment on Proposed Provision #2: Determining when an expenditure is “reasonably calculated to accomplish a TANF purpose.”

The National Association of Evangelicals opposes the portion of the proposed rule that specifically casts doubt on the relevance of pregnancy resource centers and their services to the four TANF statutory purposes:

¹ National Association of Evangelicals, “For the Health of the Nation: An Evangelical Call to Civic Responsibility.” Washington, DC: 2018, p. 33. Available at <https://www.nae.org/for-the-health-of-the-nation-publication/>.

² “For the Health of the Nation” p. 34.

“Similarly, programs that only or primarily provide pregnancy counseling to women only after they become pregnant likely do not meet the reasonable person standard because the connection to preventing and reducing out-of-wedlock pregnancies is tenuous or non-existent, and therefore do not accomplish purpose three.”

This broadly negative language is likely to encourage states to preemptively discriminate against these centers despite the importance and unique contributions of their work to the TANF purposes. In our experience the vital work of these centers often contributes to all four purposes.

Purpose (1): Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.

Pregnancy resource centers routinely provide material support to needy families which contributes to the family’s ability to care for their children in their own homes. This assistance includes clothing, furniture, diapers, and other necessities. Without this assistance some families would have to spend scarce financial resources acquiring these necessities, in some cases undermining their ability to pay rent and utility bills, jeopardizing their housing stability.

Pregnancy resource centers also often provide referrals to other public and private assistance programs for which families may be eligible, further contributing to enabling those families to care for their children in their own home.

Purpose (2): End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.

Pregnancy resource centers often refer needy parents to public and private job placement resources, and sometimes directly to job openings that may be appropriate to their needs. They also encourage client to consider marriage and offer counseling and support toward that end.

Purpose (3): Prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies;

The proposed rule notes that many of the clients accessing pregnancy resource centers are already pregnant. However, some clients are uncertain of their pregnancy status and come to the centers for free pregnancy testing. If the test results come back negative, the centers often offer counseling to unmarried clients on avoiding out of wedlock pregnancies. Even in the case of clients who are pregnant, the centers may provide counseling on avoiding future out of wedlock pregnancies.

Purpose (4): Encourage the formation and maintenance of two-parent families.

Pregnancy resource centers sometimes offer fatherhood courses and counseling, which encourages fathers to share responsibility for their child and, where appropriate, to pursue marriage with the child’s mother. This directly encourages the formation and maintenance of two-parent families.

Comment on the proposed evidentiary standards to justify state partnerships with pregnancy resource centers

We believe that a reasonable person who visits a pregnancy resource center and observes the compassionate care offered by staff and volunteers will conclude that these centers advance the several TANF purposes in multiple ways. Of course, not every center seeks or needs government funding through the TANF program. But where states have found the centers to be and effective partners whose services contribute to positive outcomes for TANF clients in the TANF purposes area, the federal government should not impose a unique evidentiary burden on states that choose to partner with these centers:

“States that provide funding for these types of programs, including through entities sometimes known as crisis pregnancy centers or pregnancy resource centers, must be able to show that the expenditure actually accomplishes the TANF purpose, that prior expenditures by the state or another entity for the same or a substantially similar program or activity actually accomplished the TANF purpose, or that there is academic or other research indicating that the expenditure could reasonably be expected to accomplish the TANF purpose.”

Evidence required of states should be proportional to the magnitude of the partnership. In some cases the required evidence might cost more to obtain than the amount of funding sought. Special academic studies or evaluations should not be required beyond the normal requirements for TANF providers. Or if these requirements are maintained for large grant partnerships, they should be waived for partnerships below a specific dollar amount, perhaps \$500,000.

We recommend deleting the specific reference to pregnancy resource centers, or if this recommendation is not accepted, acknowledge more positively that pregnancy resource centers are often valued partners of TANF administrators that contribute to TANF’s purposes and the public good. The rule should specify that the reasonable person standard meets TANF’s requirements for funding partnerships.

Thank you for considering these recommendations.

Sincerely,

Galen Carey
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