



November 29, 2023

Submitted electronically

Ann Flagg
Director, Office of Family Assistance
Administration for Children and Families
Department of Health and Human Services
330 C Street, SW
Washington, DC 20201

**Re: Public comment regarding the notice of proposed rulemaking entitled
“Strengthening Temporary Assistance for Needy Families (TANF) as a Safety Net
and Work Program”**
RIN: 0970-AC97

Dear Director Flagg,

Family Research Council (FRC) is a nonprofit research and educational organization dedicated to articulating and advancing a family-centered philosophy of public life. Our vision is a prevailing culture in which all human life is valued, families flourish, and religious liberty thrives. We respectfully submit the following comment regarding the notice of proposed rulemaking issued by the Administration for Children and Families (ACF) in the U.S. Department of Health and Human Services (the “Department”) entitled “Strengthening Temporary Assistance for Needy Families (TANF) as a Safety Net and Work Program.”

The TANF statute at 42 U.S.C. 601 (a) and 604 (a)(1) states that TANF grants must “be used in any manner reasonably calculated to accomplish one or more of the following four purposes: (1) provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives;(2) end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage;(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; and(4) encourage the formation and maintenance of two-parent families.”

Although the work of most pregnancy resource centers clearly meets these purposes, the proposed rule specifically calls out these centers, stating they “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 evaluation of pregnancy resource centers is not accurate. Here are the facts.

A pregnancy resource center (PRC) is an organization that offers material, emotional, and often spiritual support to women and men facing an unexpected pregnancy, seeking support for infants or

toddlers, or looking for guidance before or searching for healing after an abortion. In 2019, PRCs nationwide served almost two million people and provided nearly \$270 million in services.¹ Although each PRC is unique, these organizations seek to support women and men through the duration of the mother’s pregnancy and after the birth of the child by assisting with various needs, including clothing, diapers, wipes, formula; education about pregnancy, parenting, and life skills; and medical services like pregnancy tests, ultrasounds, and STD testing. Many PRCs also offer housing for mothers and their children, spiritual support, clothing, assistance for victims of abuse and human trafficking, sexual risk avoidance classes, and guidance in applying for Medicaid, SNAPs, and WIC. Pregnancy resource centers offer loving care for mothers and fathers in need.

In 2019, 291,230 clients attended parenting and prenatal education classes at a PRC, 2,525 PRCs provided material assistance to parents, 36 percent of centers provided sexual risk avoidance education presentations, 291,230 clients—both men and women—received parenting classes, and 99,522 clients received STI/STD testing.²

Pregnancy Resource Centers clearly meet all four TANF purposes.

HHS must provide clarity as to whether PRCs may continue to receive TANF funds. These organizations ought not to be singled out and excluded from TANF simply because they are life-affirming.

Respectfully submitted,

/s/ Mary Szoch, M.Ed.
Director of the Center for Human Dignity

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¹ Charlotte Lozier Institute, “Pro-life Pregnancy Centers Served 2 Million People with Essential Medical, Education and Support Services in 2019,” press release, October 21, 2020, <https://lozierinstitute.org/pro-life-pregnancy-centers-served-2-million-people-with-essential-medical-education-and-support-services-in-2019/>.

² Charlotte Lozier Institute, “Pregnancy Centers Stand the Test of Time,” report, October 2020, 16, https://lozierinstitute.org/wp-content/uploads/2020/10/Pregnancy-Center-Report-2020_FINAL.pdf.