

November 29, 2023

Filed Electronically

The Honorable Xavier Becerra
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

SUBJECT: Comments on Proposed Rule: Strengthening Temporary Assistance for Needy Families (TANF) as a Safety Net and Work Program, 88 FR 67697 (October 2, 2023), RIN: 0970-AC97, Docket No. 2023-21169

Dear Secretary Becerra:

The National Institute of Family and Life Advocates (NIFLA) respectfully submits the following comment regarding the proposed rule, "Strengthening Temporary Assistance for Needy Families (TANF) as a Safety Net and Work Program," 88 Fed. Reg. 67697 published on October 2, 2023 (the "Proposed Rule").

NIFLA is a membership of over 1,700 pregnancy centers across the nation. These pregnancy centers are vitally important to communities, families, single moms, fathers, and babies. HHS's proposed rule is unfairly targeting pregnancy centers. This bullying tactic could conclude in loss of funds to pregnancy centers while diverting those same funds to the abortion industry. The abortion industry, including Planned Parenthood, would rather those children die through the violence of abortion than to provide the difficult but heroic efforts to reduce poverty and promote family life.

Pregnancy centers provide diverse services designed to meet women and families in their need. These services range from youth education about dignity to materials items for pregnant women, babies, and older children to job assistance and mentoring to STI testing and treatment and much more. Our pregnancy center's services go well beyond our encounters with pregnant women. We reach youth and young adults in many crossroads of their lives. These services are provided free of charge to the clients.

As decided in *NIFLA v. Becerra*, 138 S. Ct. 2361 (2018), the court made it clear that the government has no right to silence any one side of a debate. Even if the government favors one side of the debate, this case underscored the fact that the government can not bully the other side. This proposed rule bullies both pregnancy centers and states.

This proposed rule would threaten important funding for pregnancy centers which provide necessary care for millions of women and families. In addition, it threatens the states' ability to determine what type of funding best meets the purposes of TANF.

We ask that you withdraw this unfair proposed rule.

Sincerely,
Thomas A. Glessner, J.D.
President, NIFLA