



ADVANCING AMERICAN FREEDOM

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

December 1st, 2023

**Re: Comments Regarding HHS’s Notice of Proposed Rulemaking Strengthening
Temporary Assistance for Needy Families (TANF) as a Safety Net and Work Program, RIN
0970-AC97, (Docket No. 2023-21169)**

Below are comments from Advancing American Freedom (“AAF”) on the Department of Health and Human Services (“HHS”)’ Proposed Rulemaking regarding amendment to the Temporary Assistance for Needy Families (“TANF”) program regulations, RIN 0970-AC97, published in the Federal Register on October 2nd, 2023.

Introduction

AAF is a 501(c)(4) non-profit organization that advocates for conservative values and policies by developing innovative policy solutions, strategies, coalitions, and messaging that build upon the accomplishments of the last administration and expand freedom for all Americans.

AAF believes resources provided through life affirming pregnancy centers are vital to supporting families and parents in need, reducing out-of-wedlock pregnancies, and encouraging two-parent families. The Department of Health and Human Services has no right to target pregnancy centers by attempting to restrict or remove their TANF funding. Centers provide a diverse array of vital resources to women and men in different stages of life, contributing to all four of TANF’s core statutory purposes. Pregnancy centers are seen by many vulnerable women as an approachable, welcoming place to receive information, supplies, and support. Removing available funds from pregnancy resource centers limits the services they can provide and the scope of their reach.

Pregnancy Centers Offer Robust and Diverse Support Services

Pregnancy centers provide essential services to hundreds of thousands of families in need each year. A report representing 2,700 pregnancy centers in the US shows that pregnancy centers served close to two million people (about the population of New Mexico) in 2019 with the majority of services being offered at little to no cost for patients. These services can include STI/STD testing, educational programs, childcare supplies, and more. In 2019 alone, pregnancy centers across the country gave sexual risk avoidance presentations to almost 900,000 students and provided 731,884 free pregnancy tests, 486,213 free ultrasounds, over 1.2 million free packs of diapers, and over 2 million free infant outfits to women and families in need. The total value of the services provided across the country in 2019 by pregnancy centers was \$266 million.¹

Targeting of Pregnancy Resource Centers

Despite the important services they provide, pregnancy centers around the nation have been under attack on multiple fronts. Since *Roe v. Wade* was overturned in 2022, there have been 88 attacks on pregnancy centers and pro-life groups in the United States.² Medical professionals and volunteers providing essential services have had their safety compromised, limiting access to necessary care for thousands of people. Pregnancy centers would continue to be targeted under this Proposed Rule through its focus on states that have provided TANF funding to pregnancy centers and its explicit language addressing pregnancy resource centers. The Proposed Rule mischaracterizes the impact and scope of pregnancy resource center services as HHS states:

“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. 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.”³

While crisis pregnancy centers or pregnancy resource centers may provide pregnancy counseling to women after becoming pregnant, as discussed earlier, they serve additional functions and provide services for people at different stages of the family planning process. One example of this is the Pregnancy Resource Center in Tennessee. Aside from the many resources available to women during and after their pregnancies, this center provides critical services for those

¹ Charlotte Lozier Institute, “A Legacy of Life and Love: Pregnancy Centers Stand the Test of Time”, October 21, 2020, https://lozierinstitute.org/wp-content/uploads/2023/01/Pregnancy-Center-Report-2020_FINAL.pdf (Pg. 16)

² CatholicVote, “Tracking Attacks on Pregnancy Centers & Pro-Life Groups”, Sept. 28, 2023, <https://catholicvote.org/pregnancy-center-attack-tracker/>.

³ 88 FR 67697

preparing for a future pregnancy such as classes on infant care, car seat safety, budgeting, resume building, and more.⁴

Effects of the Reduction of Funding for Pregnancy Resource Centers

Currently, ten states provide or have provided TANF funding to alternatives to abortion programs and pregnancy centers including Indiana, Missouri, Michigan, Louisiana, Texas, Ohio, Oklahoma, North Dakota, North Carolina, and Pennsylvania. However, Pennsylvania governor Josh Shapiro has announced that his administration will not be renewing its decades long contract with Real Alternatives, a nonprofit based in Harrisburg. Real Alternatives has received around one million dollars a year from Pennsylvania through TANF funding which will be halted at the end of 2023. Since the program's beginning in 1995, Real Alternatives has supported almost 350,000 women and has had over 1.8 million visits to its service providers.⁵ In addition to providing much needed resources and care, pregnancy resource centers save American taxpayer dollars. For example, in the fiscal year 2017-18, Real Alternatives received \$3.3 million in state funding, yet contributed \$44 million in taxpayer savings through free services such as prenatal care and up-to-date immunizations.⁶ The implementation of the Proposed Rule would significantly hurt pregnancy resource centers and alternatives to abortion programs like Real Alternatives, endangering access to critical resources and support services for Americans.

Conclusion

Pregnancy resource centers and alternatives to abortion programs support thousands of Americans, including women, men and children, through the different services they provide. Without the contributions provided by these organizations, many families would lack the necessary education, supplies, counseling, care, housing, and support networks that assist them daily. The Proposed Rule places these vital services under attack, threatening their future funding. In order to ensure vulnerable women and children continue to receive assistance, we strongly urge you to withdraw the Proposed Rule.

⁴ Pregnancy Resource Center, "Thinking About Parenting", www.prcbctn.com/thinking-about-parenting/.

⁵ Real Alternatives, "History", www.realalternatives.org/https-wp-content-uploads-2019-06-history-2019-pdfhistory/.

⁶Real Alternatives, "FY2017-18 Client Services Summary", May 31, 2019, <https://www.realalternatives.org/mi-infographic-5-31-19/>.