



To: TANFquestions@acf.hhs.gov; Office of Family Assistance (OFA); Administration for Children and Families (ACF); Department of Health and Human Services (HHS)

From: Jodi Grant, Executive Director, Afterschool Alliance

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RE: Strengthening Temporary Assistance for Needy Families (TANF) as a Safety Net and Work Program; ACF-2023-0010-0001; Regulatory Information Number (RIN) 0970-AC99

Thank you for the opportunity to comment on the proposed rule of the Administration for Children and Families (ACF) of the Department of Health and Human Services' (HHS) concerning Strengthening Temporary Assistance for Needy Families as a Safety Net and Work Program. The Afterschool Alliance is a 23-year-old non-profit organization that works to ensure that all children have access to quality afterschool and summer learning opportunities. Our network of more than 25,000 afterschool partners is expanding learning opportunities for students nationwide and tapping community partners to provide engaging, hands-on activities that prevent risky behaviors, promote student well-being, and raise school attendance, academic achievement, and graduation rates. In total, afterschool programs are serving nearly 8 million children and their families around the nation, yet nearly 25 million more youth, including 11.2 million low-income youth, would participate if more programs were available.

We appreciate the Administration of Children and Families at the Department of Health and Human Services' attention to the needs of families living in poverty and to the research base on how best to support these families, including with cash assistance and supportive child care. However, **we believe a few critical areas have been overlooked in the proposed rule that require more careful consideration. In particular, we are concerned that the proposed rule could have the unintended effect of significantly reducing access to support services for needy families with school-age children. We are concerned with the implication in the proposed rule that afterschool and summer programs would not meet a reasonable person standard for meeting TANF purposes.**

Afterschool programs for families in need with students in Pre-K through 12th grade is an important support ensuring that youth have a safe and productive place to go while parents or guardians are at work or participating in workforce training. These programs accomplish TANF purposes two, three, and four through high quality, whole child, and whole family approaches and have demonstrated positive outcomes through evaluations, as well as program level reports. Outcomes include the ability of parents to continue work and educational programs and the development of protective factors and skill building for youth that help them develop healthy relationships and prevent early and unwanted pregnancies.

The America After 3PM (2020)[1] survey report found that more than eight in ten parents agree that afterschool programs “give working parents peace of mind, knowing that their children are safe and supervised” and “help working parents keep their jobs.”

Overall, we would like to see a reconsideration of the way afterschool programs are referenced in the proposed rule and more of an understanding of the essential role they play in strengthening families and in helping families transition from poverty.

1. Families need care for their dependent children from pre-natal supports until they reach adulthood, which includes the important teenage years. Working parents of older youth (ages 13 – 18) still have an important responsibility to ensure those youth are cared for and provided with developmentally appropriate programs during the 80% of the youth’s waking hours over the course of the year, before school, afterschool, vacations and summers, when they are not engaged in the traditional school day. According to the most recent America After 3PM survey (2020), more than 11 million families eligible for free and reduced lunch want access to afterschool programming for their children, but cannot access it--- largely due to cost or lack of available programs. The research is clear about the importance of older youth having supportive spaces to go when not in school:

a. Adolescence is the second fastest period of brain development after infancy:

Adolescents begin shifting from the parent as the primary role model to combinations of their parents, their social groups, peers, and social environments. Establishing positive social environments can be critical to their development. “When adolescents do not feel socially connected, it poses serious threats to their well-being. Fortunately, social connection and close friendships can buffer adolescents from the distress associated with negative peer relations[2]”.

b. Developmental Relationships are essential features in supporting youth success among adolescents.

Research findings show the importance of identifying more proximal impacts as a means to understanding longer term impacts against higher risk behaviors. “Since the 1960s, programs in schools and other settings have tapped the power of peer influence and relationships to reduce specific behaviors of concern in adolescence, such as bullying, dropping out of school, suicide, substance abuse, and unsafe sexual practices. Building skills through interactive, experiential education methods, these programs help participants develop core elements of positive relationships, such as trust and mutual respect[3].” The Search Institute studied where young people form these positive relationships, finding that while 40% of youth reported strong developmental relationships during their school day, 70% mentioned strong relationships through their out of school programs[4]. Schools and afterschool programs work together in the best interests of youth, but can only work in tandem where strong afterschool programs exist and are accessible.

c. High school students who have connections to college and career supports take stress and time off parents.

In fact, well heeled employers are now even offering these supports as employee benefits to keep parents more focused on their work[5]. Quality afterschool programs for older youth during the school-year and over the summer

engage youth in college readiness supports that support parents in this important stage in the youth development process, helping students launch into adulthood.

2. **Parents cannot always just pay for programs with direct cash assistance.** Research on the recent increases in the child tax credit did show that parents, and most specifically lower income parents, were eager to spend on enrichment activities for their youth[6]. However, even with direct income assistance programs may remain inaccessible.

a. **Older youth program costs can be prohibitive in many cases, and lowest income cash assistance beneficiaries are most vulnerable to not being able to participate.**

Prior to receiving the recent CTC tax credit increase, a number of families mentioned hoping to spend their increase on enrichments. However, data on actual spending by the Bureau of Labor Statistics found “households with incomes in the \$100,000 and \$200,000 range increasing spending on childcare and enrichment, at rates of \$10 and \$9 per \$100, respectively, whereas other households did not show a statistically significant spending response within these categories. There are several possible reasons for this result. For one, families with incomes between \$100,000 and \$200,000 allocated less of their CTC income to necessities like food and housing, which suggests that they had more money available to spend on childcare and enrichment. Additionally, the cost of these(childcare and enrichment) categories could have precluded lower-income households from allocating some of the CTC payment to them. For example, purchasing childcare generally incurs a large, upfront cost that lower income households cannot typically afford[7].” The 2020 America After 3 PM report found that of parents who would like their child to engage in afterschool programs designed for high schoolers, 53% said costs were too high for them to enroll. Average costs for high school programs were reported to be up \$108 a week, higher even than programs for other age groups, and \$203 a week in the summer, with specialty camps costing an average of \$233 a week. Even given what many low-income families receive in direct benefits, these costs for one or more children are often unsustainable. Therefore, benefits to families for basic assistance could best serve families by providing both access to child care and youth enrichment programs, as well as direct cash assistance.

b. **Additionally, parents can only pay for programs where they exist and are accessible.** Nationally, for every 1 child in an afterschool program 3 more are waiting for access. Unmet demand for afterschool programs is even greater in rural areas, where for every one child in an afterschool program, there are four more waiting.[8]. Among rural families interested in, but unable to participate in an afterschool program, 45% of rural families say they don’t have program access in their community, and 47% say that program location is too challenging for them to enroll. Data on demand for afterschool in the US, combined with lessons learned from Canada’s British Columbia region, which offered parental subsidies for school-age program slots and found that, “many B.C. families aren’t benefiting from that government funding because they’re unable to find a licensed child-care spot either in daycare or before- and after-school care....A particular problem is a shortage of spaces in before- and after-school care[9]”, make a

compelling case for greater investments in program capacity, as well as direct cash assistance, to meet demand across the United States.

3. The recommendation that funding for TANF purpose three be provided in a piecemeal approach that only funds specific pregnancy prevention components of a program is problematic.

a. **Afterschool programs have historically been linked to prevention:** Historically, TANF purpose 3, intended to prevent out of wedlock pregnancies, has long been understood as a means of supporting youth to make healthy decisions, including through providing productive activities for their time, developing their self-esteem, and being in the presence of caring adults. This includes specific mentions of the importance of afterschool programs even in publications from two decades ago, such as a guide from 2000 on “Helping Families Achieve Self-Sufficiency: A Guide on Funding Services to Children and Families through the TANF Program[10]”. The publication details that a state may use TANF for initiatives to, “improve the performance and self -esteem of youth...because such initiatives would be expected to reduce dropout and teen pregnancy rates,” specifically mentioning examples such as Boys & Girls Clubs (p. 12). And due to clear linkages between staying in school and reduced teen pregnancy, it recognizes initiatives to keep teens in school as clearly meeting TANF’s third purpose. The link between afterschool programs and attendance, grade promotion, and graduation has only been strengthened in the last two decades. Abt Associates and other partners conducted a recent 2020 review of 60 different afterschool programs, identifying how well they met the evidence standards in the Every Student Succeeds Act (ESSA) concluding, “Taken together, the programs improved a variety of outcomes, ranging from mathematics and reading/ELA achievement to physical activity/health, school attendance, promotion and graduation, and social and emotional competencies[11].”

b. **Protective Factors Have a Key Relationship to Positive Youth Outcomes:** The evidence base around afterschool programs serving as holistic protective factors, especially for older youth, is strong. Before-school, afterschool, and summer learning programs foster protective factors in two primary ways. First, programs provide supports that are a protective factor in and of themselves, such as access to caring mentors and a safe and supportive environment. Second, during the critical time of adolescent development, participation in afterschool programs helps to develop protective factors among young people at the individual level—factors that positively promote one’s health and well-being—including positive self-concept, competence, self-efficacy, agency, self-regulation, problem solving and decision making, interpersonal skills, and belonging and connectedness[12]. Protective factors are linked to fewer problem behaviors, reduced substance misuse, and improved academic performance.[13] Afterschool and summer learning programs are vital to the fabric of community supports for young people. Adolescents benefit from ongoing opportunities to foster meaningful connections with adults and peers, space to make decisions on their own, and time to solve problems and think creatively—opportunities that are often challenging for schools to emphasize in classrooms,[14] but where afterschool and

summer learning programs excel. Afterschool programs are unique in their ability to provide greater autonomy to students and promote youth choice, youth voice, and teamwork. Statewide evaluations of 21st Century Community Learning Center (21st CCLC) programs—local afterschool and summer learning programs that receive federal support through the 21st CCLC initiative—have found students in programs report that being involved in the program has helped them work well with their peers, communicate productively, feel like they belong and matter at the program, and are able to try new things at the program.[15]

c. High school youth need holistic programs to engage their willing participation:

Additionally, high school students have many choices for their time and their attendance in any program depends on its quality and incorporation of youth interests as well as youth choice and voice across varied activities[16],[17]. If teenage youth have no access to afterschool programs in their area and TANF funds can only be used for the direct pregnancy prevention components of a program, the chances of any school or provider either being able to fund the other components or being able to engage youth in the pregnancy prevention component alone are significantly lessened. Given what is known about the Science of Learning and Development (SOLD)[18] offering more comprehensive programs to attract, engage, and impact the youth's whole child development is a more realistic approach. A more holistic approach also makes these programs more equitable with the types of enrichment that higher income students receive[19].

4. Research-based quality programming is essential.

States that use TANF funds to institute afterschool grant programs at the state level will have more influence over ensuring programs implement research based best practices and quality standards essential to positive youth development. They can also invest in the technical assistance, professional development, and continuous improvement to ensure that year after year these programs continue to provide the best possible service to the families and youth they serve. States should be able to issue these grants under Purpose 2 or 3. Similar to how the NPRM supports transfers to CCDF because of the additional structure provided for programs through that funding stream, we recommend allowing transfers to support statewide afterschool grant programs that benefit school-age youth, including:

- Utah's Teen Afterschool Prevention Grants (TAP) require research based models. Program sites are required to use a research based design or model shown to directly support the reduction of out-of-wedlock pregnancy as outlined in TANF Purpose 3. Programs are required to offer minimum dosages shown to be more effective at serving this purpose and must speak specifically to the program components targeted at prevention. However, as those working with youth know, encouraging high school youth to come to a program requires engaging their own voice and choice in program design. Therefore programs are

given some flexibility in their approach. Programs receive technical assistance through their statewide afterschool network to support overall quality.

- New York's TANF afterschool program fund specifically mentions the need for youth and family engagement, "Youth and family involvement in program planning and implementation is a key component." Within the state's programs supported by these TANF funds many have a long history of impact, which speaks to the interconnectedness of the direct sexual health training alongside the broader impacts of positive adult relationships and student agency, efficacy and leadership[20]. For example, one study revealed, "Findings suggest that Teen ACTION has had positive effects on participants' knowledge, behaviors, school performance, interpersonal relationships, and community engagement. The program helped participants to set long-term goals and understand how to achieve them. In doing so, participants reported being able to connect their choices to potential outcomes and avoid risky behaviors and their consequences such as unplanned teen pregnancy, drug use, violent behavior, and school absenteeism.... The evaluators also highlighted the importance of incorporating youth input and youth-driven decision making as a key element for keeping youth engaged." Another NY grantee, Metro Council for Teen Potential,[21] which includes a suite of programming for various age groups and settings including, "evidence-based sexuality education; youth-led music, drama and video production; recreation; peer leadership and parent programs," reports a 56% decline of teen birth rates between 2010 and 2020.
- Georgia also offers TANF grants at the state level alongside technical assistance for program providers. The Afterschool Care Program partners with community organizations not just to help youth develop the important positive relationships that support them with peers and adults, but also to, "provide technical assistance to organizations and agencies as they implement services and activities that support youth's overall well-being as they prepare for and transition to young adulthood," according to the Georgia Department of Human Services, Division of Family and Children Services.

5. Program accessibility and quality would be deeply affected by proposed programmatic changes. It is critical to note that significant changes to how afterschool programs can be funded would deeply affect the families being served by the current and longstanding state programs. Afterschool programs are already struggling with increased costs and staffing challenges and too many young people are missing out on key opportunities to support their overall wellbeing. Closing currently operating programs funded through TANF would create additional deserts and barriers to access for families that could take a long time to restore, if restored at all. The supporting materials that accompany the proposed rule estimate that approximately \$925 million in federal TANF and MOE funds support children and youth service broadly. In Georgia, \$15.5 million in annual funding is made available for afterschool programs supporting students in need, Oklahoma provides \$38 million, and many other states including Utah, Kansas, and Hawaii would also have programs put in jeopardy, with potentially no additional benefits to those high need families now being served.

6. **Maintenance of effort:** Eliminating third-party, non-governmental maintenance of effort (MOE) would impact existing and future public-private partnerships. While we believe that stronger public investments in afterschool programs result in stronger returns for the youth and communities served, we also believe that there is a role for third-party MOE to serve as a powerful tool for developing partnerships between state agencies and community-based organizations. That said, we also acknowledge that states should contribute an adequate match to the federal TANF funding. If changes are made resulting in elimination or a reduction in third-party match, we respectfully ask that at least three years be provided to transition away from third party MOE for states that have previously relied heavily on this approach to minimize negative impact on needy families served by local programs that partnered with states in this way.

In addition to the concerns outlined above, we want to take this opportunity to share our support for the following proposed changes:

- Prohibiting the use of TANF funds on general government expenses and unaligned services, which would also direct more funds towards impactful programs.
- Simplifying eligibility verification for participating families, which would reduce the administrative burden on those that already face barriers to accessing resources.

We understand how committed the Office of Family Assistance is to making this program work better for those most impacted and believe improvements in these two areas will be beneficial.

Thank you for your time and consideration of these comments. We strongly believe that the impact of these programs for the families they serve is directly connected to the purposes and goals of the TANF program. Afterschool programs are a proven strategy that helps socioeconomic mobility. Afterschool program participation is positively related to academic achievement, and academic achievement is in turn positively related to socioeconomic mobility,[22] ultimately breaking generational poverty and helping families become self-sufficient.[23] For any family with dependent children under the age of 18, the ability to afford developmental opportunities and enrichments for those youth is a key part of long-term family health and economic security.

[1] America After 3PM report: <http://afterschoolalliance.org/documents/AA3PM-2020/AA3PM-National-Report.pdf>

[2] <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6345387/#:~:text=Although%20peers%20may%20be%20a,a%20la%20social%20identity%20theory>

[3] <https://www.search-institute.org/wp-content/uploads/2017/12/Peer-report-summary-2016.pdf>

[4] <https://drive.google.com/file/d/1sMEncgwxYyKTSColdVAJj0xUSRSFmeh7/view>

[5] <https://www.npr.org/2023/10/23/1205824989/new-benefit-top-companies-college-admissions-counseling>

[6] <https://www.brookings.edu/articles/the-new-child-tax-credit-does-more-than-just-cut-poverty/>

[7] <https://www.bls.gov/osmr/research-papers/2023/pdf/ec230010.pdf>

[8] <https://afterschoolalliance.org/documents/AA3PM/AA3PM-Rural-Executive-Summary-2021.pdf>

[9] <https://vancouver.sun.com/news/despite-10-a-day-promise-child-care-fees-are-widely-different-depending-on-where-you-live>

[10] <https://files.eric.ed.gov/fulltext/ED449307.pdf>

[11] <https://files.eric.ed.gov/fulltext/ED593600.pdf>

[12] McDowell Group. (2018). Protective Factors for Youth Substance Abuse and Delinquency:

The Role of Afterschool Programs. Retrieved from <http://www.mcdowellgroup.net/wp-content/uploads/2018/02/act-protective-factors-and-afterschool-programs-1-30-2018-final.pdf>

[13] Berry, T., Teachanarong-Aragon, L., Sloper, M., Bartlett, J., & Steber, K. (2019).

Promising Practices for Building Protective and Promotive Factors to Support Positive Youth Development in Afterschool. Retrieved from http://www.cgu.edu/wp-content/uploads/2019/01/Berry_LAsBest_WhitePaper.pdf

[14] Osher, D., Cantor, P., Berg, J., Steyer, L. & Rose, T. (2018). "Drivers of human development: How relationships and context shape learning and development." Applied Developmental Science.

[15] David P. Weikart Center for Youth Program Quality. (2018). Arkansas 21st Century Community Learning Centers Statewide Evaluation.

[16] https://archive.globalfrp.org/content/download/4705/123562/file/Leave-Them-Wanting-More-Engaging-Youth-in-Afterschool-HFRP_May2015.pdf

[17] <https://files.eric.ed.gov/fulltext/EJ1063849.pdf>

[18] <https://soldalliance.org/work/>

[19] <https://journals.sagepub.com/doi/10.1177/2372732219892647>

[20] https://www.nyc.gov/assets/opportunity/pdf/TEEN_ACTION_Final%20Report_2015.pdf

[21] <https://metro councilrochester.org/programs/>

[22] <https://repository.library.georgetown.edu/handle/10822/1082788>

[23] <https://catalog.results4america.org/strategies/afterschool-programs#overview>