

December 1, 2023

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

From: MENTOR

Re: Regulatory Information Number (RIN): 0970-AC99



Thank you for the opportunity to comment on the proposed rule related to administration of Temporary Assistance for Needy Families (TANF) funding. MENTOR is the unifying national champion for expanding quality youth mentoring relationships and connecting volunteers to mentoring opportunities in their local communities. Today, we know that approximately 1/3 of all youth in America want a mentor, but can't find one. Collectively, 2/3 of all youth will experience a period of time where they wanted a mentor, but did not have one.¹ MENTOR seeks to close this "mentoring gap" and ensure our nation's young people have the connection and support they need at school, in the community, and in the workforce. We leverage evidence-based resources and provide the tools and expertise that local programs – including those within schools, community-based organizations, faith-based institutions, and the private sector – require to provide high-quality mentoring for the young people who need it most.

While we appreciate the Administration for Children and Families' efforts to better serve needy families through TANF, we are concerned that elements of the proposed rules run counter to the purpose and ultimate success of families that benefit from TANF funding. To be sure, the consequences of this proposal are significant to youth mentoring programs that use TANF funding for services that reasonably accomplish a TANF purpose, and positively impact young people and their families. As such, in response to these proposed regulations, we make three specific recommendations below:

1. The proposed regulation explicitly asserts that mentoring programs would not meet the new reasonable person standard for meeting TANF funding requirements. **This part of the proposed rule should be removed entirely.** Research and evidence prove that quality mentoring services for young people provide myriad benefits, including strengthening protective factors and preventing youth from engaging in risky behaviors. Whether they take place in afterschool/summer programs or through other community-based organizations, mentoring relationships lead to positive outcomes in line with TANF purposes.
2. The proposed regulation also requires that, for TANF purpose three, "only those costs associated with delivery of pregnancy prevention should be cost allocated and non-TANF funds used to fund other activities." This part of the proposal fails to recognize the true cost of operating a youth-serving program, and **should be removed entirely.**
3. Finally, this proposal suggests that eliminating third-party, non-governmental maintenance of effort (MOE) would have no impact on existing and future public-private partnerships and would be unlikely to result in disinvestment in TANF by a state government. While we believe that strengthening public investments into youth-serving mentoring programs positively impacts

¹ Garringer, M., & Benning, C. (2023). *Who mentored you? A study examining the role mentors have played in the lives of Americans over the last half century.* Boston, MA: MENTOR. <https://www.mentoring.org/resource/who-mentored-you>

youth, families, and their communities, we also believe that, in the absence of these strong public investments, MOE is an effective incentive to establish partnerships between state governments and mentoring programs. As such, **this part of the proposed rule should be removed entirely.**

The following sections will offer additional detail on how these proposed changes would negatively impact youth mentoring programs.

Recommendation 1: Reasonable Person Standard for Youth Mentoring Programs

While we appreciate the Administration for Children and Families' desire to better serve program participants, we are concerned that implementation of this provision would harm the youth mentoring programs that provide critical services in line with the goals of TANF in a number of states. Mentoring programs across the country already face an average of 63 young people on their waitlist.² Further, a recent longitudinal study found that 27% of youth who never had a mentor said they didn't think there were mentoring programs available in their area and 11% were stuck on waiting lists in programs already.³ Eliminating the ability for local mentoring programs to partner with their states to achieve TANF purposes would deepen the problems some programs have in community outreach, while inhibiting other programs in their efforts to decrease their waitlists. As a result, families that already face difficulties in finding safe, quality activities for young people as parents navigate job opportunities to try to end their dependence on government benefits in these communities, will encounter more.

There is also existing research and evidence that mentoring programs do, in fact, meet multiple purposes of TANF.

Without mentoring programs, parents would encounter additional difficulties finding child care; thus limiting their ability to pursue employment, education, or training programs that are in line with TANF purpose two. Mentoring programs of all types are inherently free for all program participants, with services most often (though not always) delivered by volunteers. At this point, there simply are not enough affordable, high-quality alternatives to make up the gap that would be created if mentoring, afterschool, and summer programs are made ineligible for TANF funding.

Though mentoring programs are not always targeted specifically to align with TANF purposes three and four, mentoring provides unique, broad benefits that make it an efficient and effective use of TANF funding. It is a flexible and holistic support for young people on a wide variety of their needs, as one of the few prevention and intervention tactics that can effectively address multiple risk and protective factors simultaneously.⁴ For example:

- Disconnection, isolation, and loneliness can lead to risky behavior and decision-making. Studies have found that relationships with adult mentors can improve both broader, community-level

² Garringer, Michael, McDaniel, Heather, & McQuillin, Sam. *Examining Youth Mentoring Services Across America: Findings from the 2016 Youth Mentoring Survey*. MENTOR: The National Mentoring Partnership, 2017.

³ Garringer, M., & Benning, C. (2023). *Who mentored you? A study examining the role mentors have played in the lives of Americans over the last half century*. Boston, MA: MENTOR. <https://www.mentoring.org/resource/who-mentored-you>

⁴ DuBois, D. L., Portillo, N., Rhodes, J. E., Silverthorn, N., & Valentine, J. C. (2011). How effective are mentoring programs for youth? A systematic assessment of the evidence. *Psychological Science in the Public Interest*, 12(2), 57–91.

social connectedness^{5, 6} and relationships with peers.^{7, 8} Formal youth mentoring also offers practice expertise, research knowledge, and organizational infrastructure as a foundation for addressing social isolation among young people.⁹

- Mental health symptoms – another predictive factor that leads to risky behavior – can also be addressed through youth mentoring. The Surgeon General’s 2023 Report, “Our Epidemic of Loneliness and Isolation,” cited a meta-analysis of 14 evaluations of mental-health focused mentoring programs that found a small-to-moderate effect across a variety of outcomes, including internalizing and externalizing mental health symptoms, interpersonal relationships, and academic outcomes.¹⁰
- Quality mentoring programs can also successfully target specific factors by providing a caring adult role model that, among other things, help them improve academic achievement, support career exploration and hands-on skill development, enhance their life/social skills, and more.¹¹
- Young people are less likely than their peers to start using drugs, and more likely to report volunteering regularly in their own community and holding leadership positions on a club or sports team. Mentoring programs help create positive, healthy ways to spend their time.

In addition to addressing risk and protective factors, programs with mentors who are trained on trauma-informed care can help youth combat the impact of adverse childhood experiences (ACEs)¹² which are associated with several adverse social outcomes, including teen pregnancy.¹³ A major international evidence review found that mentoring interventions are one of only four types of programs that can promote resilience at the individual and network level to help address their impact.¹⁴

The research shared above reasonably proves that mentoring programs have and will continue to prevent and reduce behaviors that may result in out-of-wedlock pregnancies, which meet TANF purpose three.

⁵ King, C. A., Gipson, P. Y., Arango, A., Foster, C. E., Clark, M., Ghaziuddin, N., & Stone, D. (2018). LET’s CONNECT community mentorship program for youths with peer social problems: Preliminary findings from a randomized effectiveness trial. *Journal of community psychology*, 46(7), 885–902. <https://onlinelibrary.wiley.com/doi/10.1002/jcop.21979>

⁶ Portwood, S. G., Ayers, P. M., Kinnison, S. E., Waris, R. G., & Wise, D. L. (2005). YouthFriends: Outcomes from a school-based mentoring program. *The Journal of Primary Prevention*, 26, 129–145.

⁷ Karcher, M. J. (2008). The study of mentoring in learning environment (SMILE): A randomized evaluation of the effectiveness of school-based mentoring. *Prevention Science*, 9, 99–113.

⁸ Schwartz, S. E. O., Rhodes, J. E., Chan, C. S., & Herrera, C. (2011). The impact of School-Based mentoring on youths with different relational profiles. *Developmental Psychology*, 47(2), 450–462.

⁹ Keller, T. E., Perry, M. & Spencer, R. (2019). Reducing Social Isolation Through Formal Youth Mentoring: Opportunities and Potential Pitfalls. *Clin Soc Work J* 48, 35–45. <https://doi.org/10.1007/s10615-019-00727-x>

¹⁰ Meyerson, D. A. (2013). *Mentoring youth with emotional and behavioral problems: A meta-analytic review* (Doctoral dissertation). Retrieved from DePaul University College of Science and Health Theses and Dissertations (Paper 56). http://via.library.depaul.edu/csh_etd/56

¹¹ Garringer, M., McQuillin, S., McDaniel, H. (2017) Examining youth mentoring services across America: Findings from the 2016 National Mentoring Program Survey. Technical Report produced by MENTOR: The National Mentoring Partnership. Retrieved from <http://www.mentoring.org/program-resources/mentor-resources-and-publications/national-survey/>

¹² CDC (2023). *Youth Risk Behavior Survey: Data Trends and Summary Report* (Atlanta, Ga.: Centers for Disease Control and Prevention), https://www.cdc.gov/healthyyouth/data/yrbs/pdf/YRBS_Data-Summary-Trends_Report2023_508.pdf.

¹³ Hibbert, S. (2019). “Afterschool Participation and Sexual Activity Among Teens,” Vermont Afterschool, vermontafterschool.org, [https://vermontafterschool.org/safe-](https://vermontafterschool.org/safe-sex/#:~:text=The%20findings%20were%20encouraging%3A%20Afterschool,participation%20in%20afterschool%20programming%20increased.)

[sex/#:~:text=The%20findings%20were%20encouraging%3A%20Afterschool,participation%20in%20afterschool%20programming%20increased.](https://vermontafterschool.org/safe-sex/#:~:text=The%20findings%20were%20encouraging%3A%20Afterschool,participation%20in%20afterschool%20programming%20increased.)

¹⁴ Di Lemma L.C.G., Davies A.R., Ford K., Hughes K., Homolova L., Gray B and Richardson G. (2019). *Responding to Adverse Childhood Experiences: An evidence review of interventions to prevent and address adversity across the life course*. Public Health Wales, Cardiff and Bangor University, Wrexham, ISBN 978-1-78986-035-1.

Finally, program participants also hold on to the skills they develop through mentoring programs into adulthood. These skills and lessons promote the formation of healthy relationships and families, thus meeting TANF purpose four. In fact, in addition to success stories and program satisfaction rates, there is strong public support for government investment in youth mentoring: a public survey in 2019 found that 83% of Americans express some agreement that government funds should be used for youth mentoring.¹⁵

Recommendation 2: Limiting Spending on Funding for TANF Purpose 3

This proposed regulation fails to recognize the reality of running a youth-serving mentoring program. Importantly, for programs to be successful in addressing TANF purpose three, they must recruit, screen, match, and regularly train high-quality mentors, who deliver services and the curriculum. But while some programs may be targeted at healthy relationships and preventing premature sexual activity, the vast majority of programs will not program solely for the purpose of preventing out-of-wedlock pregnancy. As noted in the previous section, mentoring programs provide holistic supports for young people that prevent them from participating in risky behavior. The greatest benefit of these programs for youth, family, and the community instead comes from building healthy habits, skills, and protective factors, that help prevent risky behaviors that could lead to out-of-wedlock pregnancy, among many other important benefits.

Recommendation 3: Removing Third-Party, Non-Governmental Maintenance of Effort

While we believe that additional public investment specifically in youth mentoring programs would yield even better returns for youth, families, and communities, MOE is an important tool to incentivize partnerships between government agencies and mentoring programs. There is unique value to these types of partnerships. For example, as previously noted, 27% of youth said they didn't know of any programs in their area. Integrating outreach and services between the government and community-based organizations will only achieve stronger outcomes for youth, families, and communities. Removing non-governmental MOE would also make it more difficult for mentoring programs – which rely on philanthropic support to operate – to attract donors, potentially further reducing their services.

Finally, this proposed rule also dismisses concerns about the possibility of states deciding to reduce their spending on TANF services overall if non-governmental MOE were eliminated. Regardless of the number of states impacted by this potential change, thousands of young people and families could be impacted by a reduction of services that could *or could not* be covered by the state government's TANF funding decisions. There are no guarantees in this proposal that states would *actually* do what is intended by this rule, and invest more state funding into TANF, which would potentially harm youth and families.

Conclusion

Thank you again for the opportunity to comment on this proposal. We urge the Department to address the concerns written above, and not exclude mentoring programs from serving the country's young people, families, and communities by delivering the critical services that TANF provides for. Please contact Abbie Evans, VP for Government Relations & Strategic Partnerships at MENTOR with any follow up or questions: aevans@mentoring.org or (202) 997-4102.

¹⁵ Garringer, M., & Benning, C. (2019). *The Power of Relationships: How and Why American Adults Step Up to Mentor the Nation's Youth*. MENTOR. <https://www.mentoring.org/resource/the-power-of-relationships/>