

24 June 2019

Honorable Danny K. Davis, Chairman (07-IL)
Ways and Means Committee
Subcommittee Worker & Family Support (116th Congress)
U.S. House of Representatives
1102 Longworth House Office Building
Washington D.C. 20515

Re: Committee Submission - Celebrating Fathers and Families: Federal Support for Responsible Fatherhood

Mr. Chairman, and honorable members of the Worker & Family Support subcommittee, on behalf of colleagues throughout the United States, Fathers & Families Coalition of America is facilitating recommendations for consideration set forth. Since 1996, on some level, the opportunity to develop new TANF funded fatherhood initiative to the current position I serve as President and Chief Executive Officer working with exceptional leaders throughout the United States and internationally to address the essential opportunities in direct practice, policy, professional development, and community involvement with the primary focus on improving outcomes for children.

The central purpose of the submitted recommendations, how can we develop enhanced systems, capacity, and a vision to champion the needs for healthy families through engaging fathers in services. The recommendations celebrate the successful efforts from policy-makers, federal government agency leadership, and stakeholders who provide direct services through an array of fatherhood programs. However, striving for excellence to ensure all our states, local communities, tribal nations, and Commonwealths could benefit from a paradigm shift directed by Congress. The following recommendations could be one of many platforms to enhance the discussions on creating a national model and national programming of the wellness of children with increased father involvement with high standards for implementation of services from state and local partnerships.

In the past 15-years, Congress' leadership has bolstered fatherhood initiatives, and the 116th Congress afforded the opportunity to consider recommendations from national stakeholders as exemplified below. I am available at Fathers & Families Coalition of America's home office number 760-578-8661, fax number is 310-217-0874 and email to Ms. Alfie Tarazón, Assistant to President & Chief Executive Officer at alfie@fathersandfamiliescoalition.org

Respectfully submitted recommendations follow,



James C. Rodríguez,
Chief Executive Officer & President

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Cc: Member of the Worker & Family Support Subcommittee

Honorable Jackie Walorski (02-IN)
Honorable Brad Wenstrup (02-OH)
Honorable Dwight Evans (03-PA)
Honorable Gwen Moore (04-WI)
Honorable Jimmy Gomez (34-CA)

Honorable Judy Chu (27-CA)
Honorable Ron Estes (04-KS)
Honorable Stephanie Murphy (07-FL)
Honorable Terri Sewell (07-AL)
Honorable Tom Reed (23-NY)

VISION FOR FATHERS AND FAMILIES 2020 PLATFORM

April 25, 2019, one hundred seventy (170) stakeholders throughout the United States established an advisory group, Unifying Voices on Fatherhood Initiatives.ⁱ The group included colleagues from diverse professions (public policy, research, social work, early childhood, criminal justice, child welfare, child support, institutions of higher education, public and private sectors, psychology, law, etc.) from 30 states.ⁱⁱ The purpose of this advisory was established to provide recommendations to improve the coordination and delivery of father engagement services and practices throughout the United States. Simultaneously, the opportunity to provide a few recommendations for House Ways and Means Subcommittee on Worker and Family Support's hearing on Celebrating Fathers and Families: Federal Support for Responsible Fatherhood.ⁱⁱⁱ

The submission of recommendations is intended for the formal record of public comments to modify The Deficit Reduction Act (DRA) appropriating discretionary grants intended for the implementation of the Healthy Marriage and Responsible Fatherhood Initiative (HMRF). The initial DRA funding in 2005, by the reauthorization of Temporary Assistance for Needy Families (TANF)^{iv} and reauthorized under the Claims Resolution Act of 2010^v is now under the third wave of grantees. HMRF funding is vital to the success of American families. At \$150 million per year evenly divided between Healthy Marriage and Relationship Education (HMRE) and New Pathways for Fathers and Families (RF), these grants provide the largest single funding stream for programs to promote the financial and personal responsibility of noncustodial parents to their children, reduce the incidence of parental absence in the lives of children, and improve outcomes for children raised in one-parent homes. They have been invaluable in extending fatherhood services, building the fatherhood profession, investigating and evaluating the elements of effective fatherhood programs and the outcomes they produce, and making public and private organizations aware of the importance of father engagement.

The importance of the HMRF grant program to address the impacts of father-absence to the wellness of children, engaging fathers to increase the overall wellness of families, communities, both parents and children. There is clear evidence of the importance of father involvement in the lives of children.^{vi vii} We understand that Members of Congress are aware of the benefits of integrated services that support the final outcome of improved livelihood for children^{viii}. Administration for Children and Families (ACF) distributed the essential call for Integrating Approaches that Prioritize and Enhance Father Engagement information memorandum (IM) is to strongly encourage all human service agencies to jointly create and maintain an environment that prioritizes father engagement as a critical factor in strengthening families.^{ix}

The most recently awarded RF grants which are scheduled to run through FY 2020 consist of 44 awards (39 Fatherhood and 5 Reentry) in 21 states. The total amount of the 44 RF/Reentry awards is \$55,144,425, which translates into an average annual award to programs of \$1,253,282, or \$6,266,411 over the five-year award period. Additional funds of \$20,000,000 per year are allocated to assessing short and long-term outcomes to enhance program evaluation and strengthen program design. We are concerned about many aspects of the HMRF structure. While at least one award made in 21 states, 29 states received no awards at all. All of the awards are devoted to the delivery of program services and their evaluations; none dedicated to the creation of stable, state-level initiatives to help initiate, support and improve fatherhood services in needed geographical areas and for specific populations and sub-groups. The program-specific focus of the awards does not lend itself to the creation of inter-program practitioners'

networks to improve practice. Nor does the program-specific funding structure encourage collaboration and lend itself to the creation of inter-agency and inter-program systems within states designed to coordinate service delivery and better address the multiple needs of low-income and nonresident fathers and their families. The program-specific structure of the awards does not lend itself to the development of commissions, interagency councils, and other systems that facilitate the inclusion of fathers in state policies, plans, processes and programs for children and families. Finally, the centralized nature of the evaluation, technical assistance, and coordination services available through the HMRF program does not lend itself to building and supporting state-level capacity in these areas. Nor is the centralized structure of the HMRF program conducive to state buy-in and investment in fatherhood programming using state resources such as its unobligated TANF balances.

This opportunity for open public comment allows informing Members of Congress on how to improve this vital national program. Our recommendations stem from the collective expertise of the individuals that participated with the Unifying Voices on Fatherhood Initiatives stakeholders planning. We have examined established and previous federal programs, U.S. Codes, Public Acts, and evidence-based models to foster a national response for sustained fatherhood programs in every state.

Recommendation No. 1: Make More Awards for Responsible Fatherhood Programs at Lower Dollar Levels

We recommend that OFA fund at least twice as many RF programs as it currently does with the \$55 million being spent on RF programs and pay for this expansion by cutting award amounts by at least 50 percent. Current award levels for the 44 RF and Reentry grants funded by OFA range from \$562,941 to \$2,000,000 per year. As previously noted, these have been awarded to programs in 21 states. Over a five-year award period, this translates into program funding ranging from \$2,814,705 to \$10,000,000. Most RF programs are small-scale and operate with budgets that are only a fraction of this size. They will be unable to sustain these grant-funded budgets through their independent fund-raising efforts once the OFA grant ends. By reducing grant levels by at least half, OFA will be able to award grants to at least twice as many programs and extend services to programs in many of the 29 states that have received no OFA funding for RF programs in the third wave of awards. We recommend during an interim phase to prepare every state the opportunity to develop meaningful fatherhood initiatives for years three, four, and five of DRA funding. The funding levels proposed extends the existing reach and impacts.

Recommendation No. 2: Make Formula Based Awards to Every State

Effective in years three, four, and five, Congress shall direct Responsible Fatherhood (RF) funds to be allocated to each state so that every state has the potential to develop an infrastructure dealing with fatherhood as well as effective funding programs within the state. The allocation should be made using a population-based formula that considers the number of children in vulnerable single-parent families relative to two-parent households. One example of such a method used in the State Access and Visitation (AV) Grant Program^x which makes annual awards of \$10 million to states to increase contact between non-resident parents and their children. Based on the formula, states receive a minimum AV Grant award of \$100,000 per year and a maximum award of \$1 million.

Since RF program awards currently amount to \$55 million per year, which is 5 times the annual AV award levels of \$10 million, the minimum award for support of programs dealing with responsible fatherhood in small states could be at least \$500,000 per year and the maximum award for large states

could be at least \$5 million. Datasets to determine funding could be derived from TANF One-Parent Caseloads^{xi} similar to the dataset of Child Support, Child Poverty to appropriate increased awards based on the state-population child poverty rates^{xii}, rate of children in foster-care system^{xiii}, or consider number of children and families in Head Start. ACF has several population-based, time-limited, and number of awards to an application. The Office of Refugee Resettlement (ORR) uses a Social Services Formula Allocations to award ORR/ACF grantees throughout the United States utilizing comparative datasets for the optimal allocation of funding appropriated by Congress.^{xiv} We recommend Congress direct ACF to award by state using the population-based formula and examine datasets will ensure awards meet each state, district, and family needs by the end of the 24-months of the potential five (5) year

Recommendation No. 3 Create a State Level Father Engagement System in Every State through the Creation of Strengthening Families Collaboration Offices

We are recommending the creation of a Strengthening Families Collaborative Offices (SFCO) in every state and commonwealth. The DRA/HMRF shall establish a state collaboration grant modeled from the Head Start State Collaborative Office, 42 U.S. Code § 9837b. Authorized by Section 642B (a) (2) (A) of the Head Start Act^{xv}. Like the Head Start Collaboration Offices (HSCOs), Strengthening Families Collaborative Offices (SFCO) would be intended to accomplish multiple goals in each state: 1) strengthen services for fathers throughout the state; 3) encourage collaboration between fatherhood programs and other relevant programs and services to provide access to comprehensive services and support for fathers and families; 4) encourage collaboration between fatherhood programs and agencies and programs dealing with children and families including child welfare, child support, health, and education; 5) augment the capacity of fatherhood programs to partner on state initiatives for children and families; and 6) facilitate the involvement of fatherhood programs in state policies, plans, processes, and decisions dealing with low-income families and children.

An additional duty of the SFCO would be to administer HMRF grant funds allocated to their states and make awards to qualified programs using a credible procurement process. Two existing models focus on Responsible Fatherhood Initiatives where legislation was passed with bipartisan support to improve outcomes for children who had been affected by father-absence^{xvi}. In 1999, the State of Connecticut established a statewide initiative under Public Act No. 99-993, later named after State Representative John S. Martinez Fatherhood as a broad-based, multi-agency, statewide program led by the Department of Social Services that is focused on changing the systems that can improve fathers' ability to be fully and positively involved in the lives of their children Public Act No. 09-175^{xvii}.

Ohio Revised Code 5101.34 established the Ohio commission on fatherhood with an effective date of July 2000^{xviii}. The similarities of the State of Connecticut and the Ohio Commission on Fatherhood to make its awards to fatherhood programs, managed, operated, and guided with community stakeholders with one staffed position. The models exist for the SFCOs that also would coordinate and sponsor state-level research and technical assistance activities for fatherhood programs within their state. As in Connecticut, Ohio engages multiple state agencies and community stakeholders in including fathers in all state programs and policies. Ohio also makes awards to established fatherhood programs in the state for operations, awards funding for pilot projects in new communities or service settings, monitors grant performance and the collection of evaluation information to prepare annual reports on program outcomes and benefits to participants and the state, and conducts training activities for practitioners and convening. Both Commissions operate with very limited staff and funding and provide strong models for the desired structure of the new SFCOs.

We recommend that Congress generate the appropriate level of funding for the SFCOs by taking the \$20 million currently allocated for RF research, reduce the existing in-direct charges to the appropriated funding directed by Congress, reduce the existing ancillary RF related contracts and use these funds for SFCOs in each state making awards in states ranging from \$250,000 to \$750,000. We recommend individual state award levels based on a population-driven formula discussed in Recommendation 1. Even if Congress dedicated only half of the \$20 million for this purpose—the \$10 million would be enough to create SFCO offices with budgets of \$100,000 to \$1 million. We recommend that Congress follow the guidelines that of subsections D and E of Sec. 469B. [42 U.S.C. 669b]^{xix} ensuring the intended appropriations are used for direct services and reduce the in-direct and program evaluation costs. We recommend Congress direct SFCO grants effective in year one of the DRA to ensure an effective paradigm shift in year three and continuously.

Recommendation No. 4(a): Transition to the Award of HMRF Grant Funds during Months 25-60 through Interested SFCOs Using Formula-Based Awards

We recommend that by month 25, HMRF grant program funds will be allocated to each interested state SFCO using a population-based formula that considers the number of children in vulnerable single-parent families relative to two-parent households. One example of such a formula is the one that is used in the State Access and Visitation (AV) Grant Program which makes annual awards of \$10 million to states to increase contact between nonresident parents and their children. Based on the formula, states receive a minimum AV Grant award of \$100,000 per year and a maximum award of \$1 million. Since RF program awards currently amount to \$55 million per year, which is 5 times the annual AV award levels of \$10 million, the minimum award for support of programs dealing with responsible fatherhood in small states could be at least \$500,000 per year and the maximum award for large states could be at least \$5 million.

Interested state SFCOs be responsible for soliciting, reviewing, awarding and supervising HMRF grant funds for program awards by month 25 of the next funding cycle. As with the OFA-administered program, awards would be made to establish fatherhood programs within their state with a demonstrated capacity to recruit, retain and deliver high-quality services to fathers that are consistent with the purposes of the DRA. States would be able to tailor the number and menu of awards they make to fill needs within their state and build on existing program strengths and capacities. They might also choose to award small grants to newer and less experienced programs to stimulate the creation of fatherhood programs in underserved geographical areas and/or to reach targeted populations that are not currently being served. Procurement procedures would also be followed in the awards of grants and contracts for practitioner training, technical assistance, and evaluation aimed at supporting fatherhood programs.

Recommendation No. 4(b): Establish a Planning Year to Phase in the Creation of SFCOs and Development of Procurement Processes

We recommend a year planning for the SFCO establishment through local partnerships and government advisory council. The SFCO will provide a structure and a process to work and partner with state agencies and local entities. Together, these partners work to leverage their common interests around fatherhood initiatives, integrative approaches to engage fathers and families increase the effectiveness and methods of coordination. Procurement processes will be developed using models such as those established by the Ohio Commission on Fatherhood. Awards for direct services will be made in years two (2) – five

(5) through the SFCO. HRMF awards will go through the SFCO to successful applicants, including service providers, researchers, state-county-local-tribal-migrant agencies, and faith-based organizations.

Recommendation No. 5: OFA Should Make 24-Month Program Awards for the Next Cycle of HMRF Fatherhood Awards and Transition to State-Level Funding Awards Through SCFOs During Months 25-60.

OFA will conduct a procurement process and make program awards during the 24-months while SFCOs are organizing. It is anticipated that interested SFCOs will assume responsibility for conducting a procurement process, administering HMRF grant funds and making awards or direct fatherhood services in years two (2) through five (5). We expect that some SCFOs will augment funding for state-level fatherhood service activities by securing access to unobligated TANF balances at the state level and through other multi-agency partnerships.

Recommendation No. 6. Fund the Administration of SFCOs by Reducing Expenditures for OFA-Sponsored Fatherhood Evaluation and Technical Assistance Activities

We recommend that \$10 million of the \$20 million currently spent annually on OFA-sponsored fatherhood evaluation and technical assistance activities be utilized to fund SFCOs. Using the AV Grant formula, a \$10 million grant program is sufficient to award each state a grant ranging from \$100,000 to \$1 million for SFCO operation and activities. On an annual basis, this would enable states to create SFCOs and underwrite their efforts to coordinate and lead the process of building fatherhood service systems and promoting father engagement in state-level programs and policies. States may choose to augment these funds with unobligated state TANF balances. For example, the State of Ohio has used unobligated TANF funds of \$1 million per year to support its Fatherhood Commission and make sub-awards to seven fatherhood programs in Ohio for services (annual funding will rise to \$2.3 million on July 1, 2019).

Recommendation No. 7. Encourage Use of Existing Interagency Fatherhood Collaborations and Initiatives to Create SFCOs

To leverage existing collaborative arrangements and minimize administrative costs, states should house the SFCOs with existing compatible, multi-agency, cooperative, family-oriented agencies, programs, and organizations. This might include a state-level Fatherhood Commission, Children's Council, Fatherhood Task Force, Two-Generation Office and/or Fatherhood Initiatives. In states that lack such an entity with the capacity to administer the grant and conduct a procurement process for the award of grants and contracts to fatherhood programs for services, the award should go to the State Child Support Agency and child support should take the lead in creating an SFCO. The Child Support Agency administers the Access and Visitation Grant. In FY 2016, more than 99,000 low-and-moderate-income families were served through the AV Grant program. These services were offered through nearly 300 contracts with local plans for services such as mediation, parent education, and supervised visitation.

Recommendation No. 8: Use HMRF grant funds to fund fatherhood programs and conduct relevant technical assistance, coordination and evaluation activities

We recommend that Congress establish a collaboration grant with first rights of refusal to the State or approval of a single application through the State. Congress should instruct states (and the SCFOs they create) to use at least 80 percent of HMRF funds they receive on grants and contracts with programs for the delivery of services that are consistent with the purposes of awards. The remaining 20% of the grant used for the provision of training, technical assistance, and evaluation services for the efficient execution of high-quality fatherhood programs and other grant-related activities pertaining to the promotion of father involvement in state policies, plans, processes and decisions dealing with children and families.

The SFCO partnership requirements are expected to coordinate services for efficient execution of grant-related activities. Key partnerships modeled from HSCO where it is essential for all Federal, State, tribal, and local entities to collaborate to ensure success. SFCO collaboration will help to provide the right mix of strengthening family's partners to develop, enhance, monitor, and sustain local to state fatherhood initiatives with common goals assisting practitioners and agencies with skills involved in developing state fatherhood initiatives by and to facilitate collaboration.

Recommendation No. 9: Conduct State-Level Procurement Processes to Award HMRF Funds for Fatherhood Programming and Technical Assistance and Evaluation Activities

State SFCOs would establish procurement processes for the award of HMRF grant funds to develop fatherhood programs within their state with a demonstrated capacity to recruit, retain and deliver high-quality services to fathers that are consistent with the purposes of the DRA. They might also choose to award small grants to newer and less experienced programs to stimulate the creation of fatherhood programs in underserved geographical areas and/or to reach targeted populations that are not currently being served. The procurement process employed by the Ohio Commission on Fatherhood to make its awards experienced and "pilot" fatherhood programs in Ohio provide an excellent example of a state-level system for establishing criteria for eligible applicants, soliciting proposals, reviewing them, making awards, and monitoring performance. State procurement procedures would also be followed in the award of grants and contracts for training, technical assistance, and evaluation aimed at supporting fatherhood programs.

Recommendation No. 10: Make Smaller Awards to More Organizations for Program Services, Technical Assistance, and Evaluation Activities to Address State Needs and Achieve the Goals of the DRA

It will be up to each state SFCO to craft a procurement process, solicit proposals and make awards for fatherhood program services and the relevant training, technical assistance and evaluation support that these programs will require. Funding will be used to augment existing state capacity in these areas and to fill gaps and address identified needs in various geographical regions, population sub-groups, and areas of expertise. Nevertheless, one intent of this reorganization should be to extend funding to more programs that are currently funded by OFA and to necessarily reduce HMRF award levels which presently range from \$562,941 to \$2,000,000 per year.

There are numerous ways to achieve this goal. One is to have SFCOs adopt a version of a tiered funding model that is currently used by the federal government with a version of the following funding formula.^{xx} Thus, programs that use a curriculum-based format consisting exclusively of primary education, life-skills, parenting education, domestic violence prevention, and case management, etc.) Might be eligible to compete for awards with an annual ceiling not to exceed \$250,000 per year. On the other hand, programs that use an approach that includes practical workforce development activities and blend curriculum based fatherhood programming with job training, career pathways, credential attainment, and employment opportunities would be eligible to compete for more significant awards with an annual base of \$500,000.

The Fatherhood Workforce Development focuses on a model aligned to The Workforce Investment Act with a local Fatherhood Workforce Advisory where local providers create a model of fatherhood-centered skills and a training model in community-based settings with a minimum of \$750,000.00 per state.

In summary, there are many opportunities to enhance direct services through Congress' leadership for a fatherhood initiative that will impact millions of children, mothers, and fathers nationally. We surveyed our colleagues that provided additional recommendations to include expanding services for teenagers who are foster-care children, and simultaneously, young parents (fathers) with limited intentional programming for foster-care young fathers. Peers mentioned a lack of prenatal paternal engagement programming nationally, as well as, youth in the criminal justice system and fathers that if Congress considers possibilities for improvement of practices impact nationally, unfunded and or under-funded services could be the next progression. However, the recommendations, as mentioned above, will develop opportunities for every state, county, district, and community to have a level of funding directed by Congress through ACF with State and community partnerships.

ⁱ <http://fathersandfamiliescoalition.org/posts/local-to-global-social-policy.html>

ⁱⁱ *Arizona, Arkansas, California, Colorado, Connecticut, District of Columbia*, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Maryland, Massachusetts, Michigan, Minnesota, Missouri, New Hampshire, New Jersey, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, South New Wales*, Tennessee, Texas, Virginia, Washington, and Wisconsin.*

ⁱⁱⁱ <https://www.congress.gov/event/116th-congress/house-event/109611>

^{iv} <https://www.federalregister.gov/documents/2008/02/05/08-455/reauthorization-of-the-temporary-assistance-for-needy-families-tanf-program>

^v <https://www.congress.gov/111/plaws/publ291/PLAW-111publ291.pdf>

^{vi} <https://eclkc.ohs.acf.hhs.gov/family-engagement/article/engaging-fathers>

^{vii} <https://www.childwelfare.gov/topics/famcentered/engaging/fathers/>

^{viii} <https://fas.org/sgp/crs/misc/RL31025.pdf>

^{ix} <http://fathersandfamiliescoalition.org/images/FFCAPOLICY/ACF.Fatherhood.IM-FINAL-10-16--Sig.pdf>

^x <https://www.acf.hhs.gov/archive/css/css/resource/css/resource/program-legislation-access-and-visitation-grants>

^{xi} https://www.acf.hhs.gov/sites/default/files/ofa/2018tanf_1parentfamilies_03252019_508.pdf

^{xii} <https://www.childrensdefense.org/wp-content/uploads/2018/09/Child-Poverty-in-America-2017-State-Fact-Sheet.pdf>

^{xiii} <https://www.casey.org/state-data/>

^{xiv} <https://www.acf.hhs.gov/orr/resource/fy-2018-refugee-social-services-formula-allocations>

^{xv} <https://eclkc.ohs.acf.hhs.gov/about-us/article/about-head-start-collaboration-offices>



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^{xvi} <https://www.cga.ct.gov/ps99/Act/pa/1999PA-00193-R00HB-06466-PA.html>

^{xvii} <https://www.cga.ct.gov/2009/ACT/PA/2009PA-00175-R00HB-06486-PA.html>

^{xviii} <http://codes.ohio.gov/orc/5101.34>

^{xix} <https://www.acf.hhs.gov/archive/css/css/resource/css/resource/program-legislation-access-and-visitation-grants>

^{xx} <https://www.acf.hhs.gov/archive/css/css/resource/css/resource/program-legislation-access-and-visitation-grants>

