



December 4, 2019

Friends at the U.S. Department of Health and Human Services,

We write to strongly affirm proposed rule RIN 0991-AC16 as a substantive effort to preserve and strengthen America's social safety net by ensuring that faith-based organizations remain welcome allies in service to people in need.

The Christian Alliance for Orphans (CAFO) includes more than 200 member organizations and a global network of churches. While diverse in size, mission and areas of focus, all of these members are motivated by their faith to serve vulnerable children and families through foster care, adoption, family strengthening and/or a wide array of other programs and services.

We observe daily that faith-based organizations play a vital part in response to the needs of the hurting, both in the US and worldwide. What we see informs our conviction that everyone benefits when government policies ensure welcome and accommodation for faith-based individuals and organizations working to address human need. This is true first because it reflects the Constitution, laws and character of the United States. But just as important, this pluralistic approach also maximizes the breadth and diversity of partners working to address the immense human needs faced today.

Significantly, faith-motivated individuals and organizations provide an outsized portion of America's social safety net. For example, regular church-attenders donate to charity more than three times the percentage of their personal income compared to the percentage given by those who don't attend church. These faith-motivated people give more not only to religious organizations, but to non-religious organizations as well. They also volunteer, give blood, and serve neighbors at notably higher rates. (See the book [Who Really Cares?](#) and other research).

These contributions of faith-based actors are particularly vital in the US foster system. For example, in Arkansas, a network of churches named The C.A.L.L. recruits and supports two-thirds of all non-kin foster placements in the state. Likewise, a 2014 analysis of the contributions of a single faith-based organization in Florida found it contributed \$4.5 million in savings annually to the foster system and other state programs via partnerships that remain almost entirely privately funded. Similar agencies, church networks, and organizations make a difference across the country every day of the year, from Oklahoma to Oregon, Colorado to Arizona, Florida to Washington, DC.

What is true on the organizational level is true of families as well. For example, 2013 research by Barna found that practicing Christians are twice as likely to foster and to adopt as the general population, and also more likely to welcome sibling groups and

children with special needs. This is why 2008 research by Pew found that while roughly 40% of Americans attend church services weekly, a full 65% of foster parents do.

People of faith contribute to the foster system in other ways as well. For example, faith-motivated individuals provide significant donations to supplement any funds faith-based agencies may receive from government, thus multiplying public funds and increasing the quality of services. Church communities also provide critical material, emotional, and spiritual support to adoptive, foster and biological families. According to Barna Research, more than 40 percent of congregations offer some form of organized foster and/or adoption supports, and most all provide at least some form of this help organically. This is likely part of why a 2002 study found that people who learn about fostering through a church or religious organization foster for 2.6 years longer than others.

Faith-based organizations also offer other critical services, from family reunification and preservation programs, to mentoring of aging-out youth, to foster family retention. For example, while it is estimated that 50% of foster families drop out within the first year, the excellent foster family support system of Promise 686 in Georgia has resulted in a retention rate of more than 80% at the one-year mark.

The point isn't that faith-based partners are always "better," but that they are invaluable allies in any serious effort to meet the needs of vulnerable children and families. It is to the benefit of our entire society that these individuals and organizations continue to be welcomed as partners in service, as this proposed regulation seeks to ensure.

In regard to the matter of child placement policies, our understanding of RIN 0991-AC16 is that it would not prevent any qualified person or couple from welcoming children through foster care and adoption. It is our understanding that a clear, dignified pathway exists for any qualified person or couple to foster or adopt in every community in the US. If there are concerns that this is not the case in any locality, we recommend that the responsibility for guaranteeing such a pathway be placed not upon faith-based agencies for whom it may require a violation of conscience, but rather upon government offices and/or other agencies for whom child placements are not a matter of religious conviction. This would be a reasonable accommodation that all Americans could live with. Faith-based agencies, meanwhile, can be expected to make respectful referrals to these alternative agencies when necessary – just as most all agencies currently do when facing unique situations and needs they are not well-equipped to address.

It is also important to note that, as a general rule, all of the organizations that are part of CAFO endeavor to serve *any* child in need, consistent with the organization's capacity and area of focus. In addition, most all also offer training and support to any adults in need in a similarly open-handed way, including both families in crisis and foster and adoptive parents. This open-handedness is constrained only when the individual organization believes a particular action would require violation of conscience.

Certainly, history has seen many tragic distortions of Christianity. But at the heart of true Christian conviction is the belief that every person – regardless of their religion, sense of identity or personal choices – carries profound dignity and value because they share God’s image and are loved by Him. *This* is why Christians serve.

Therefore, as CAFO, we believe that it would be neither productive nor right to require that faith-motivated people separate the good fruit of their religious convictions from the roots of those convictions. It would be both wrong and counter-productive to demand that faith-based agencies be willing to violate their conscience as a condition of partnership with government to serve people in need.

Such attempts would undoubtedly diminish the social safety net in America. First, many faith-based organizations would feel obliged to withdraw from public partnership. Second, many of those that chose to yield their convictions in order to remain in public partnership would be less able to draw upon the willing foster and adoptive parents, family supports, financial generosity, volunteers, and other supports provided by devout faith communities. Indeed, in states that have adopted such policies, the size and strength of foster care engagement has notably declined.

In contrast to this narrow and coercive approach stands the historic American commitment to pluralism in public partnerships. Pluralism seeks out, welcomes and accommodates a broad diversity of partners in public service. When government policies reflect true pluralism, they maximize the number and variety of organizations involved, boost innovation, tap an expansive range of complementary strengths, and expand the services and homes available for those who need them most. Pluralism works for the public good – both for government and taxpayers *and* for people in need.

We understand and respect that there are a broad range of differing opinions today on these issues. We do not minimize the importance of these differences. But we also believe strongly that people that do not agree on every issue — even very complex ones like these — can still live in mutual appreciation and can even labor together in matters of shared concern. It is our sincere desire to do exactly that with all who share a commitment to service, even those who see things very differently than we do.

With Respect,

The Christian Alliance for Orphans

www.CAFO.org