



August 28, 2006

Office of Family Assistance  
Administration for Children and Families  
5<sup>th</sup> Floor East  
370 L'Enfant Promenade, S.W.  
Washington, DC 20447

Dear Sir or Madame:

The National Association of Counties supports maximum state and county flexibility in implementing the reauthorization of the Temporary Assistance for Needy Families Block Grant (TANF). It is with concept in mind that NACo offers the following comments on the interim final TANF regulations.

**Treatment of Individuals with Substance Abuse and Behavioral Health Problems:**

NACo is pleased that HHS is including these services as allowable TANF activities. We are concerned, however, that the regulations could be interpreted as counting one hour as an entire week. States and counties should be able to count an hour of participation as one hour. Since these activities are limited to six weeks, prorating one hour to a week of participation would short change individuals with substance abuse and behavioral health problems. An alternative would be to allow states and counties to count 240 hours a year of these activities.

States and counties should be allowed to count participation by individuals with mental health and substance abuse problems based on the number of hours that their medical professionals deem appropriate for the individual, even if it is below 30 hours a week.

**Basic Skills and English as a Second Language:** Today's economy requires a well-trained workforce. Individuals with poor basic skills and poor English language skills will not be able to obtain meaningful employment. NACo, therefore, suggests that basic skills training, remedial education, and English as a second language should count as job readiness activities and should also be an allowable component of vocational education.

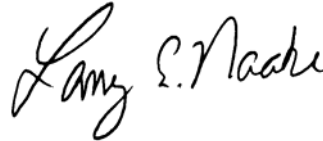
**Supervision and Reporting Requirements:** NACo believes that the documentation requirements for many of the allowable activities will pose an administrative burden and should be revised. These include daily reporting for job search and biweekly reporting for education related to employment, secondary school attendance, vocational education, and jobs skills training, among others.

**Community Service Programs:** The regulations prohibit job search and job readiness instruction as part of a community service program. The purpose of community service employment is to improve the employability of individuals. Job readiness and job search are essential components of an employability program and should be allowed in community service programs.

**Secondary School Attendance:** The regulations asked for comments regarding possible criteria for what constitutes making good or satisfactory progress. Since elementary and secondary education is primarily a state function, NACo believes that these criteria should be developed at the state and local level and not in federal regulations.

If you have any questions about our comments on the interim final regulations, please do not hesitate to call Marilina Sanz, our Associate Legislative Director for human services and education at 202-942-4260 or by e-mail at [msanz@naco.org](mailto:msanz@naco.org). In closing, I thank you for the opportunity to comment on the interim final regulations and for including the National Association of Counties as partners and participants in the listening sessions that you recently conducted.

Sincerely,

A handwritten signature in black ink that reads "Larry E. Naake". The signature is written in a cursive style with a large, stylized initial "L".

Larry E. Naake  
Executive Director