

Examples of Social Service Programs and Potential Harms

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The Trump administration's proposed faith-based regulations will roll back religious freedom protections for individuals seeking government-funded social services¹ in many ways, from striking the requirement that beneficiaries be referred to an alternative provider to encouraging providers to seek religious exemptions from program requirements.

Below are some examples of programs that could be affected by the proposed rules and examples of potential harms we could see under each Department's regulation.

- **Agriculture**

- Programs

- Commodity Supplemental Food Program (CSFP)
 - Community Foods Projects Competitive Grants
 - The Emergency Food Assistance Program (TEFAP)

- Examples of Potential Harms

- An older person receiving food packages under the CSFP program could be forced to pick them up in a church that he knows labels him as a sinner. The proposed rules could put LGBTQ seniors, who often already struggle to access culturally competent support services, at greater risk.
 - Local food distribution agencies, such as food pantries or soup kitchens, could try to deny services to vulnerable populations, including transgender people, single mothers and their children, and immigrants.

- **Education**

- Programs

- 21st Century Community Learning Centers
 - TRIO: Upward Bound

- Examples of Potential Harms

- A student who identifies as LGBTQ or who is a child of LGBTQ parents could be confronted with open anti-LGBTQ hostility by an ED-funded social service program partnering with their public school to provide healthcare screening, transportation, shelter, clothing, or new immigrant services.
 - A low-income student participating in an Upward Bound program for college readiness preparation may be forced to accept it from a faith-based service provider that continuously invites them to participate in additional religious activities. The student feels uncomfortable but doesn't know that they can access an alternative provider or how to find one.

¹ "Social services" are defined in [Executive Order 13279](#).

- **Justice**

- Programs

- Juvenile Mentoring Program
 - Second Chance Reentry Initiative
 - Grantee Programs to Support Human Trafficking Victims
 - Transitional Housing Assistance Grants for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

- Examples of Potential Harms

- A substance use disorder program partnering with state drug courts could refuse to recognize a transgender person's gender identity or make anti-LGBTQ statements while providing care.
 - An atheist required to attend a substance use disorder program could be forced into a 12-step program that requires the recognition of a higher power. Because the person was never told of their rights, they might continue to attend the program unsuccessfully, or they might drop out and not seek another provider because they think all programs will require adherence to a higher power.
 - A victim of human trafficking seeking vital services like housing or financial assistance to help them create a life away from their trafficker could feel uncomfortable getting services from a faith-based provider² and drop out of the program, putting their safety at risk.
 - LGBTQ individuals may not have the same opportunities to return to their communities, if they are denied access to a Second Chance Reentry Initiative programs due to their sexual orientation or gender identity; and may not be given referrals to alternative providers. Transgender people have sometimes even been sent back to prison when re-entry programs refused to serve them.
 - An "at-risk" teenager who is considered likely to be involved in the juvenile justice system or who has opioid or substance use issues could seek one-on-one mentoring services from a community member who pressured them to attend religious programming. Because of their age and vulnerability, the teenager might participate in activities they don't want to because they don't know they can say no.
 - A woman and her children who are victims of domestic violence and need housing go to a faith-based provider. She feels the abuse she suffered was rooted in her abuser's religious beliefs. She and her children don't know they can seek another provider and are forced to endure an environment that they feel is traumatizing.

² A February 10 [Reuters article](#) reported that a Christian organization running a safe house for adult female victims of trafficking got a \$530,000 grant from DOJ. The safe house's policies required women who stayed at the safe house attend church. Staff training manuals said "homosexuality is immoral and abusing drugs for pleasure is 'witchcraft.'"

- **Health and Human Services**

- Programs

- Refugee Support Services/ Discretionary Targeted Assistance Grant (TAG) Program
 - Assistance for Torture Victims
 - Sexual Risk Avoidance Education
 - Basic Center Program—Runaway and Homeless Youth
 - Transitional Living for Homeless Youth
 - Head Start
 - Trafficking Victims Assistance Program
 - Teenage Pregnancy Prevention Programs
 - Congregate and Home-Delivered Nutrition Programs (including “Meals on Wheels”)
 - Community Collaborations to Strengthen and Preserve Families (Title IV-E funding)
 - Titles IV-B and IV-E of the Social Security Act (child welfare programs)

- Examples of Potential Harm

- If an unaccompanied minor in the care of a religious provider were denied transportation to and translation services at medical appointments for services the religious provider opposes, the minor would have no way to seek another provider.
 - LGBTQ people receiving voucher assistance can be refused a secular provider and can be required to participate in religious activities as part of a social service program. For example, an individual using a voucher to get services in a drug recovery program could be forced to choose between forfeiting treatment and being required to participate in religious programming and ministry—even if the programming is anti-LGBTQ. An LGBTQ couple could be forced to enroll their child at a religious facility that refused to recognize their marriage, relationship status, or gender identity in order to utilize their ACF-funded childcare voucher.
 - An LGBTQ youth facing homelessness and served by RHYA could be required to participate in a program that refused to recognize their gender identity or was hostile to LGBTQ people.
 - Pregnant and parenting teenagers who are in foster care could be assigned to a group home run by a faith-based provider that encourages "voluntary" church attendance and Bible study for the teens with rewards of a trip to the shopping mall or toys for their children and are surrounded by religious messages on the walls of her room. A parenting teen who was raised in a different faith tradition is terribly uncomfortable and desperate to get out. She would rather run away than continue to be subject to what she feels is religious coercion and judgment of her.

- A family of origin whose children are in foster care are getting services designed to reunite and keep the family together. A faith-based organization providing parenting training suggests they would be better parents if they practiced a different religion. A faith-based provider could counsel a single mother to get married because men should be heads of households. Families in these situations would not seek an alternative provider, even though they are very uncomfortable, because they fear they would not be reunited with their children.
- An organization receiving funds under the Older Americans Act to operate spousal and caregiver support groups could refuse to recognize a same-sex spouse.
- A faith-based organization could receive funding to provide nutrition under the Congregate and Home-Delivered Nutrition Programs but may deny services to a beneficiary due to their sexual orientation or gender identity.
- A victim of torture seeking services might be retraumatized by having to receive services from a faith-based provider of a different religion, or given that individual's past trauma, they might not have the ability to speak up about the religious character of the program.
- A kid or young adult seeking Transitional Living for Homeless Youth program services like a bed, educational opportunities, or job training might be forced to receive services from a faith-based provider and have no way to access an alternative provider.
- A family seeking Head Start early learning services for their child or access to nutritional meals for their children may be forced to receive services from a faith-based provider or in a church.

- **Homeland Security**

- Programs
 - Citizenship and Assimilation Grant Program: Citizenship Instruction and Naturalization Application Services
 - FEMA programs
- Examples of Potential Harm
 - A same-sex couple could be refused family housing in the wake of a natural disaster or a transgender shelter seeker could be refused gender appropriate housing by a FEMA grantee. The shelter could also be empowered to refuse access to medically necessary care.
 - A FEMA grantee could claim a right to refuse to assist a same-sex or couple in requesting federal disaster relief benefits.
 - A faith-based organization might be the only provider of the education classes that a person needs to complete as a prerequisite for gaining citizenship and may teach the classes in a way that implies Christianity is the preferred religion in the United States, or a church might host the naturalization ceremony.

- **Labor**

- Programs

- Senior Community Service Employment Program
 - Homeless Veterans' Reintegration Program
- Examples of Potential Harm
 - A homeless veteran seeking job training to gain employment might be forced to receive those services from a faith-based provider, but feel uncomfortable there because the program takes place in a room adorned with religious banners, Bible verses, and religious symbols.
- ***Veterans Affairs***
 - Programs
 - VA Homeless Providers Grant and Per Diem Program
 - Supportive Services for Veteran Families
 - Examples of Potential Harms
 - A veteran who is at risk of homelessness seeks help with case management, and wants to get services, including education, crisis intervention, and counseling. The veteran is nonreligious and feels very uncomfortable at a faith-based provider. After serving in the military for years, the veteran is unaware that there are other service providers and that there could be choices to get different kinds of services.
 - A veteran family seeking housing or temporary financial assistance could be forced to seek services from a faith-based organization and not know they could seek an alternative provider.
- ***Housing and Urban Development***
 - Programs
 - Housing Counseling Grants
 - Continuum of Care Program
 - Supportive Housing for the Elderly
 - Supportive Housing for Persons with Disabilities
 - Housing Opportunities for Persons With AIDS (HOPWA)
 - Examples of Potential Harm
 - A transgender woman could risk being turned away from a woman's emergency shelter or a same-sex couple could be refused family housing at a HUD-funded provider.
 - A faith-based provider helping people seeking information and assistance in instances such as buying their first home, or preventing foreclosure on their home could claim a right to turn away a single mom or a same-sex couple.
 - Individuals or families dealing with a mental health condition, substance use disorder, HIV/AIDS, or homelessness seeking community living or case management could be forced to receive these services from a faith-based provider.

