

**Madison Brame**

From: Michelle Elliott
Sent: Friday, December 16, 2022 7:20 AM
To: IRRC
Subject: Fw: 16A-66 (Consideration of Criminal Convictions)

From: Sara Jane Elk <sje@easternstate.org>
Sent: Thursday, December 15, 2022 11:52 AM
To: RA-STRegulatoryCounsel@pa.gov <RA-STRegulatoryCounsel@pa.gov>
Cc: Michelle Elliott <melliott@irrc.state.pa.us>
Subject: 16A-66 (Consideration of Criminal Convictions)

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Dear Members of the Counsel:

I write, on behalf of our board of directors and staff of Eastern State Penitentiary Historic Site, Inc., to object to the proposed regulations: 16A-66 (Consideration of Criminal Convictions). We ask that they be reworked to allow more Pennsylvanians returning from jail or prison into licensed occupations.

The proposed regulations would create too broad, lifelong bans on occupational licenses for people with criminal records. They would harm the individual trying to reenter the community, the community itself, and the families trying to rebuild after the long absence of a parent or breadwinner. Approximately two-thirds of released state prisoners who are not gainfully employed are rearrested within three years of release.

We have been Fair Chance Employers since 2016, and have witnessed the extraordinary contributions that many formerly incarcerated people offer the workforce. Like any responsible employer, we conduct rigorous background checks, and we recognize that not all applicants are right for our workplace. Years of doing this work have convinced us that regulations should be strategic in both scope and length of time.

The list of offences that are included in the proposed regulations should be as narrow as possible, and people should not be assumed to be unfit for life. We have seen, time and again, individuals turn a corner and begin an earnest journey back toward family and career. We believe that we are all uplifted by supporting those journeys, not cutting them off before they begin. And building a more inclusive economy, one that comprises those who are formerly incarcerated, makes for a safer Pennsylvania – for all of us!

Please reach out if you would like more background on our experiences with Fair Chance Hiring, and concern about the proposed changes. I can be reached at (215) 236-5111 x211, or at this email address.

Thank you for your consideration.

Sincerely yours,

Sara Jane Elk
President and CEO

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