Original: 2195

Independent Regulatory Review Commission
333 Market St.
Harrisburg, PA 17120

Fax: (717) 783-2664

Re: DPW Final-Omitted Regulations #14-447
Implementation of TANF/Act 35

Dear Members of the IRRC:

I am writing to urge you not to approve DPW's Regulations #14-447. These regulations are really important and DPW should not be rushing them through. DPW has taken almost five years to issue them, and the public should be given the normal time to respond to DPW's proposals. The regulations will harm low-income families, and include provisions that are especially harmful to families that are homeless, people with disabilities, and people with limited English proficiency. The regulations include some provisions that violate the state statutes, and others that are contradictory to DPW's policies. **Please do not approve the regulations in their current form.**

Problems with the regulations include problems with how the regulations deal with the time limit on federally funded TANF benefits, the work requirements, and the Family Violence Option provisions to protect battered women. These are complicated provisions, and more time is needed for the public to comment and for DPW to consider those comments before issuing final regulations. Here are some of the most important problems:

- **Families eligible for General Assistance (the state's welfare program) will be barred from getting it if they have used up their 60 months of federally funded TANF.** This violates our state statute, which does not have a time limit for General Assistance, and which clearly allows families that are no longer eligible for TANF to get General Assistance if they meet the GA criteria. Children and people with disabilities are two of the groups that meet the GA criteria.

- **The regulations don't provide *any exceptions at all* to the 60 month TANF time limit.** The federal law allows states to exempt 20% of the TANF caseload from the 60 month time limit, and to exempt battered women from the time limit. DPW has announced that it intends to provide exemptions through "Overtime"programs, but the regulations don't allow for any exemptions. The regulations also don't even mention (and apparently would not allow) DPW's new "Time-Out" program that DPW has said will start on July 1, 2001, and take certain categories of families "off the clock."

- **The welfare office will no longer be required to help people who are having trouble getting "verification"of a disability.** For many people with disabilities, especially people who are homeless or have limited English proficiency, getting verification can be difficult - if

caseworkers don't help gather the necessary paperwork, these people may not be able to prove they are disabled. The regulations also delete the existing protection that only "reasonably available" documents can be required.

- **The protections to prevent inappropriate sanctions have been gutted.** Important protections have been in place to ensure that families don't lose their benefits when they are trying to comply with work requirements, or when they have been unable to comply because of illness, child care problems, or misunderstanding. The regulations eliminate these protections. As a result, families could lose their benefits even though they are trying their best to comply with work requirements.

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Thank you for considering these comments. I hope that you will not approve these regulations until these problems have been fixed.

Sincerely,

Eric Saunders

Eric Saunders
300 Hermitage St.
Philadelphia, PA
19128

Original: 2195

June 1, 2001

To Independent Regulatory Review Commission
333 Market Street
Harrisburg, Pa. 17120

Dear Members of the I.R.R.C,

This letter is asking you not to approve the Regulations #14-447 issued by the Department of Public Welfare - because not enough time is allowed for the public to respond. From information I received, there are violations in relation to Pa. State statute as there is no time limit to General Assistance - while in the regulations people are barred from G.A. when they are no longer eligible for TANF.

Also, federal law allows for exemptions in people eligible for TANF - so let us use the exemptions for the hard cases that are with us.

The Common Good is our Common responsibility - and nobody can be secure and safe when a basic

level of well-being is not possible for a segment of our population.

Again - my main point is for now:
NOT TO APPROVE the regulations which have been issued by the Department of Public Welfare.

Thank you for your attention

Helena M. Schaareman
422 Newgate Ct. Apt. A2
Bensalem Pa 19020

S
Ms. Helena Schaareman
422 Newgate Ct Apt A2
Bensalem, PA 19020-7770

Original: 2195

Sholom Aleichem Club

P.O. Box 27648 Philadelphia, PA 19150

Independent Regulatory Review Commission
333 Market St.
Harrisburg, PA 17120

Fax: (717) 783-2664

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Implementation of TANF/Act 35

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Thank you for considering these comments. I hope that you will not approve these regulations until these problems have been fixed.

Sincerely,

Florence Olivenbaum

Social Action Committee

Original 2195

Interfaith Coalition for the General Welfare
c/o Mishkan Sholom. 8836 Crefeld Street
Philadelphia, PA 19118

2001 JUN -1 PM 2:26

Independent Regulatory Review Commission
333 Market St.
Harrisburg, PA 17120

Fax: (717) 783-2664

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Implementation of TANF/Act 35

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Thank you for considering these comments. I hope that you will not approve these regulations until these problems have been fixed.

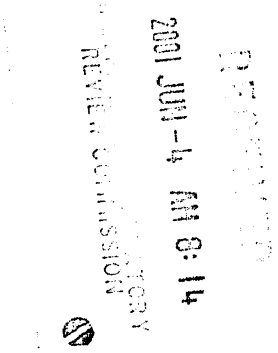
Sincerely,

Vivian Schatz
Chair of the
Legislative Committee

Original: 2195

WinVisible - women with visible and invisible disabilities
Every Mother is a Working Mother Network
C/o Crossroads Women's Center
P.O. Box 11795
Philadelphia, PA 19101
215-848-1120; Fax: 215-848-1130; email: 72144.1055@compuserve.com

Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17120



Fax: (717) 783-2664
Date: June 1, 2001

Re: DPW Final-omitted Regulations #14-447

Implementation of TANF - Act 35

Dear Members of the IRRC:

The organizations we represent, WinVisible - Women with Visible and Invisible Disabilities and the Every Mother is a Working Mother Network, strongly oppose DPW's Regulations #14-447, which would have devastating consequences on the women in our networks and their children. As women who oppose the current TANF legislation which denies the value of the caring work women do for their own children and families, and the extra burden of work carried by women with disabilities (whose own caring work is completely ignored), these DPW regulations add insult to injury and must not be approved.

We are writing to urge you not to approve DPW's Regulations #14-447. These regulations must not be rushed through and members of the public must be given an opportunity to review and comment on them. We urge you to hold public hearings with sufficient notice and at a variety of times and places to enable as many people as possible to make their views known.

We speak for many across Pennsylvania who strongly oppose these regulations and demand sufficient opportunity for public comment.

Sincerely,

Pat Albright
Pat Albright
Every Mother is a Working Mother Network

Mary Kalyna
Mary Kalyna
WinVisible

Original: 2195

Independent Regulatory Review Commission
333 Market St.
Harrisburg, PA 17120

Fax: (717) 783-2664

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Problems with the regulations include problems with how the regulations deal with the time limit on federally funded TANF benefits, the work requirements, and the Family Violence Option provisions to protect battered women. These are complicated provisions, and more time is needed for the public to comment and for DPW to consider those comments before issuing final regulations. Here are some of the most important problems:

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Thank you for considering these comments. I hope that you will not approve these regulations until these problems have been fixed.

Sincerely,

Catherine Wirth
Career Counselor
Frankford Career Services, CDC-FGM

Original: 2195

Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17120

Re: DPW Final-omitted Regulations #14-447
Implementation of TANF - Act 35

Dear IRRC members:

This letter implores that you do not approve DPW's Regulations #14-447. I do not understand why these regulations are being rushed through when it has taken DPW has taken almost five years to issue them. There is no reason why the public should not be offered the customary time to respond to these important regulations !

I am convinced that these new regulations will be extremely detrimental to low-income families, and especially harmful to families that are homeless, people with disabilities, and people with limited English proficiency.

In addition there are some provisions that actually violate the state statutes, and others that are contradictory to DPW's policies. For example:

Families eligible for General Assistance (the state's welfare program) will be barred from getting it if they have used up their 60 months of federally funded TANE. This violates our state statute, which does not have a time limit for General Assistance, and which clearly allows families that are no longer eligible for TANF to get General Assistance if they meet the GA criteria. Children and people with disabilities are two of the groups that meet the GA criteria.

The regulations don't provide any exceptions at all to the 60 month TANF time limit. The federal law allows states to exempt 20% of the TANF caseload from the 60-month time limit, arid to exempt battered women from the time limit. DFW has announced that it intends to provide exemptions through overtime programs, but the regulations don't allow for any exemptions. The regulations also don't even mention (and apparently would not allow) DPW's new "Time-Out" program that DPW has said will start on July 1, 2001, and take certain categories of families "off the clock."

The welfare office will no longer be required to help people who are having trouble getting "verification" of a disability. For many people with disabilities, especially people who are homeless or have limited English proficiency, getting verification can be difficult if caseworkers don't help gather the necessary paperwork, these people may

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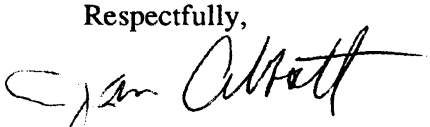
The regulations would also wrongly deny cash assistance to people who have been disqualified from the Food Stamp program but who have not been convicted of any crime. These people should still be able to get cash assistance.

Finally, the regulations don't properly protect survivors of domestic violence. They are not consistent with policies recommended by the Domestic Violence Task Force appointed by DPW and previously adopted by DPW. For example, "good cause" waivers of the child support enforcement cooperation requirement should not have an "expiration date" and should last as long a woman or her children need a waiver to ensure that their safety is not jeopardized.

Please do not approve the regulations in their current form and thank you for considering these comments.

Respectfully,



Jan Abbott
Ph.D. Candidate
Penn State
814 867-7062
jga115 @psu.edu

Original: 2195

Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17120

Fax:(717)783-2664

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Sincerely,

Molly Edwards
138 Rockland Rd.
Havertown, PA 19083

Original: 2195

Independent Regulatory Review Commission
333 Market St.
Harrisburg, PA 17120

Fax: (717) 783-2664

5/31/01 RECEIVED
2001 JUN -5 AM 10: 03
REVIEW COMMISSION

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Sincerely,

Tom Anne Dei
St. Vincent's

Original: 2195

JUBILEE SOUP KITCHEN
(412) 261-5417
JUBILEE PANTRY
(412) 683-0739
ADKINS CAREER PROGRAM
(412) 261-1535
JUBILEE JOB CORNER
(412) 261-4428
JOHN HEINZ FAMILY CENTER
PARENTS AS TEACHERS PROGRAM
(412) 263-2616

JUBILEE ASSOCIATION INC.

P.O. Box 42251 • Pittsburgh, PA 15203-0051

May 29, 2001

Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17120

Dear Members of the Independent Regulatory Review Commission,

We write to express our strong opposition to the recent final TANF regulations from your Department of Public Welfare. Our opposition has two distinct elements.

First, the regulations attempt to bar families from General Assistance even though this need not be the case. They do not allow for warranted "time out" and "overtime" that would ease the burden on particularly vulnerable families. In addition, the regulations will weigh heavily on families with disabilities and on victims of domestic violence. Such harsh treatment of the poor is immoral. "Welfare to work" has allowed successful transitions to self-sufficiency for some families. But others both lack the skills of the successful ones and are struggling for jobs that pay only a fraction of a true living wage.

Second, after waiting almost five years, the regulations are now issued with a sense of urgency and with the proviso that no time is available in which to hold public hearings on the matter. Governmental officials need to hear from families about what the consequences of their decisions are.

Some citizens may ask whether Pennsylvania can afford to be more compassionate. The surplus in TANF revenue and in General Assistance indicate that we can afford it. We ask, can Pennsylvania afford NOT to be more compassionate. Such cruel treatment of the poor is appalling. Those officials who are perpetrating such systematic violence to such vulnerable families are undermining the common good. All of us will pay for this disgrace.

At Jubilee Kitchen we serve between 150 to 200 people daily and support 180 other households with food weekly from our Pantry. Most of our people are too scarred by poverty, abuse, mental illness, violence, and addiction to ever achieve economic self-sufficiency. But we also serve families who are desperately struggling to escape from the worst scars of poverty. Some will make it. Others will be hurt badly by these regulations.

For God's sake, listen to public reaction on how the regulations will impact families. For God's sake, temper their harshness. For the sake of the common good of Pennsylvania, the long-term solution to problems of welfare cannot be forced into five years for many families. Without moderation, many families will be pushed into greater poverty and suffering. We at Jubilee see each day the horrible impact of poverty. All Pennsylvanians will pay the price in rising crime and other social ills as well as in the increased hardness of heart that will carry over to our own families and other relationships.

Please moderate these regulations.

Sincerely,

Sister Liguori Rossner
Executive Director

James Ruck
Assistant Director

Cc: Governor Tom Ridge
Feather O. Houstoun
Senator Leonard Bodack
Congressman Bill Robinson

Original: 2195

Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17120

Re: DPW Final-omitted Regulations #14-447
Implementation of TANF - Act 35

May 25, 2001

Dear Members of the IRRC:

I am writing to urge you not to approve DPW's Regulations #14-447. These regulations are really important and DPW should not be rushing them through. DPW has taken almost five years to issue them, and the public should be given the normal time to respond to DPW's proposals. The regulations will harm low-income families, and include provisions that are especially harmful to families that are homeless, people with disabilities, and people with limited English proficiency. The regulations include some provisions that violate the state statutes, and others that are contradictory to DPW's policies. Please do not approve the regulations in their current form.

Problems with the regulations include problems with how the regulations deal with the time limit on federally funded TANF benefits, the work requirements, and the Family Violence Option provisions to protect battered women. These are complicated provisions, and more time is needed for the public to comment and for DPW to consider those comments before issuing final regulations. Here are some of the most important problems:

- Families eligible for General Assistance (the state's welfare program) will be barred from getting It if they have used up their 60 months of federally funded TANE. This violates our state statute, which does not have a time limit for General Assistance, and which clearly allows families that are no longer eligible for TANF to get General Assistance if they meet the GA criteria. Children and people with disabilities are two of the groups that meet the GA criteria.

- The regulations don't provide any exceptions at all to the 60 month TANF time limit The federal law allows states to exempt 20% of the TANF caseload from the 60-month time limit, arid to exempt battered women from the time limit. DFW has announced that it intends to provide exemptions through "Overtime" programs, but the regulations don't allow for any exemptions. The regulations also don't even mention (and apparently would not allow) DPW's new "Time-Out" program that DPW has said will start on July 1, 2001, and take certain categories of families "off the clock."

- The welfare office will no longer be required to help people who are having trouble getting "verification" of a disability. For many people with disabilities, especially people who are homeless or have limited English proficiency, getting verification can be difficult if caseworkers don't help gather the necessary paperwork, these people may not be able to prove they are disabled. The regulations also delete the existing

protection that only "reasonably available" documents can be required.

- The protections to prevent inappropriate sanctions have been gutted. Important protections have been in place to ensure that families don't lose their benefits when they are trying to comply with work requirements, or when they have been unable to comply because of illness, child care problems, or misunderstanding. The regulations eliminate these protections. As a result, families could lose their benefits even though they are trying their best to comply with work requirements.

- The regulations don't include the compromise modifications to DPW's work program that DPW adopted to avoid legislation that would have allowed more education and training when House Bill 1266 was pending. DPW agreed to exercise its discretionary authority to make important changes in its work requirements to allow greater access to education and training. These changes, which are consistent with Act 35, should be included in the regulations.

- The regulations illegally disqualify people from cash assistance who have not been convicted of crimes. The state statute says that people who are convicted of certain crimes are disqualified from getting cash assistance. However the regulations would also wrongly deny cash assistance to other people who have been disqualified from the Food Stamp program but who have not been convicted of any crime. These people should still be able to get cash assistance.

- The regulations don't properly protect survivors of domestic violence. They are not consistent with policies recommended by the Domestic Violence Task Force appointed by DPW and previously adopted by DPW. For example, "good cause" waivers of the child support enforcement cooperation requirement should not have an "expiration date" and should last as long a woman or her children need a waiver to ensure that their safety is not jeopardized.

Thank you for considering these comments. I hope that you will not approve these regulations until these problems have been fixed.

Sincerely,

Hanne Weedon
V.P., The ThirdPath Institute
Philadelphia, PA 19143
215-724-7525
Hanneweedon@aol.com

Original: 2195

5/25/01

Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17120

Fax:(717)783-2664

Re: DPW Final-omitted Regulations #14-447
Implementation of TANF - Act 35

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Thank you for considering these comments. I hope that you will not approve these regulations until these problems have been fixed.

Sincerely,

Carolyn Steglich
521 E. Prairie St
Harrisville PA 16038

Original: 2195

Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17120

Fax:(717)783-2664

Re: DPW Final-omitted Regulations #14-447
Implementation of TANF - Act 35

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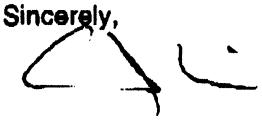
Thank you for considering these comments. I hope that you will not approve these regulations until these problems have been fixed.

Sincerely,



Susan J. Sierra
103 W Queen Lane
Philadelphia, PA 19144

TUGSA

Temple University Graduate Students' Association
American Federation of Teachers, AFL-CIO

1501 North Broad Street
1st floor, side office
Philadelphia, PA 19122
Phone: 215.235.0512
Fax: 215.235.0513
Email: union@tugsa.org

Fax Transmittal Form

To

Name: IRRC
Org./Dpt.:
CC:
Phone:
Fax: 717 783 2664

Date sent: 5.25.01
Time sent:
Pages (with cover): 3

Message:

From

Name: Sue Siem
TUGSA/AFT/AFL-CIO
Phone: (215) 235-0512
FAX: (215) 235-0513

Original: 2195

Independent Regulatory Review Commission
333 Market St.
Harrisburg, PA 17120

2001 MAY 24 PM 3:34

Re: DPW Final-Omitted Regulations #14-447
Implementation of TANF/Act 35

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Problems with the regulations include the time limit on federally funded TANF benefits, work requirements, and the Family Violence Option provisions to protect battered women. These are complicated provisions, and more time is needed for the public to comment and for DPW to consider those comments before issuing final regulations. Here are some of the most important problems:

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Sincerely,

Barbara E. McCabe
718 Pineview Lane
North Wales, PA 19454

Original: 2195

1119 Queensbury St.
Pittsburgh, PA 15205
May 24, 2001

Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17120

Fax:(717)783-2664

Re: DPW Final-omitted Regulations #14-447
Implementation of TANF - Act 35

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Sincerely,
Carol A. McCullough

FAX
TRANSMISSION

PhoneTools

BVRP

FROM	User
TO	IRRC

Page(s)	3	
12 /	5/24/01	3:25 PM

Message

from Carol McCullough

Fax :

Phone :