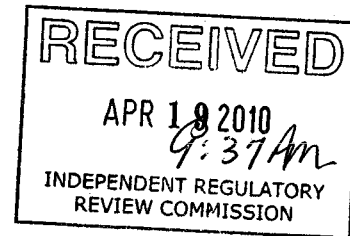


Pennsylvania Coalition Against Domestic Violence

The Nation's First State Domestic Violence Coalition • Founded 1976

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Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101



Re: Regulation No. 14-513
Codification of the Family Violence Option

Dear Independent Regulatory Review Commission:

On behalf of the Pennsylvania Coalition Against Domestic Violence, I submit the following comments in support of final form Regulation No. 14-513 which codifies the federal Family Violence Option requirements in Pennsylvania.

In 1997, very shortly after the enactment of PWRORA, Pennsylvania under then Governor Ridge elected to adopt the FVO and created a Task Force to assist the state in implementing this provision for both TANF and General Assistance. The Task Force included advocacy organizations, survivors of domestic violence, and officials from various offices of the Department of Public Welfare.

The Task Force worked cooperatively and productively for over a decade under Governor's Ridge, Schweiker, and Rendell to support and assist the Department in its implementation of the FVO. We are very pleased to see the publication of this final form regulatory package, the culmination of many years of cooperative effort.

The final form regulations set forth policies and procedures that faithfully implement the intent of the FVO. They also adopt many of the technical recommendations made by commentators following the publication of this regulatory package as proposed rulemaking.

As envisioned by the FVO, the proposed regulations take a three-pronged approach to addressing the needs of domestic violence victims. These policies:


- Help to identify victims of domestic violence who may be in need of help;
- Provide for referral of victims to counseling, shelter, or other appropriate services; and
- Provide for waiver of certain TANF or General Assistance program requirements when compliance with a requirement would place a victim at greater risk of domestic violence; make it more difficult for a victim to escape an abusive situation; or unfairly penalize a victim because of domestic violence.

Importantly, the proposed regulations establish strict confidentiality requirements and protocols to ensure the privacy and protection of those who disclose domestic violence and ask for help.

Many of the policies codified in these regulations have actually been in operation under three administrations and have provided incalculable help to victim women, men, and children across the Commonwealth.

We enthusiastically support approval of regulation 14-513.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. J. Dierkers". The signature is written in black ink and is positioned above the printed name.

Margaret J. Dierkers
Executive Director