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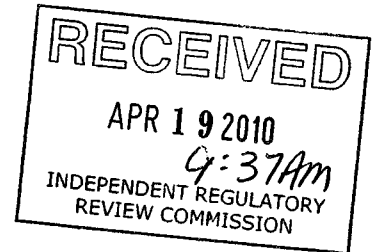
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April 16, 2010

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:

The Pennsylvania Coalition Against Rape participated in comments leading to the final form Regulation No. 14-513 which codifies the federal Family Violence Option requirements in Pennsylvania. We endorsed the regulations since the federal definition of battering/subject to extreme cruelty has been interpreted by the Department to include sexual violence victimization. It is our understanding that there will be a proposal to specifically enumerate the crime of sexual violence in the federal definition of the Family Violence Option. Given that the Department has assured us that the Commonwealth applies the aforementioned definition, we are confident that Pennsylvania will be in compliance with the proposed federal changes.

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

It is important to note that the proposed regulations mandate strict confidentiality requirements and protocols to ensure the privacy rights and the protection of victims who seek help and disclose the violence in their lives.

We support approval of regulation No. 14-513 by the Independent Regulatory Review Commission.

Sincerely,

Delilah Rumburg
Executive Director