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Edward J. Zogby, Director
Bureau of Policy
Department of Public Welfare
Room 431 Health and Welfare Bldg.
Harrisburg, PA 17120

2008 SEP 15 AM 11:14
INDEPENDENT REGULATORY
REVIEW COMMISSION
RECEIVED

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

Dear Mr. Zogby:

Pathways PA submits the following comments in support of Regulation No. 14-513 which codifies the federal Family Violence Option requirements in Pennsylvania. As a nonprofit organization that has been serving women and their families for 30 years, we have seen many families in need of special assistance due to the impact domestic violence has had on their lives.

The Family Violence Option (FVO) was included by Congress in the Personal Responsibility and Work Opportunities Reconciliation Act of 1996 (PRWORA) as a means for states, at their election, to help assure and expedite access to Temporary Assistance for Needy Families (TANF) for needy victims of domestic violence. The FVO is grounded in research showing that a large percentage of women and children receiving welfare are or have been victims of domestic violence. TANF can provide financial support and services critically needed by these families as they flee abusive situations and attempt to address their safety needs.

In 1997, very shortly after the enactment of PRWORA, Pennsylvania (under Governor Ridge) adopted 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, clients, and officials from various offices of the Department of Public Welfare.

The Task Force worked cooperatively and productively for over a decade under Governors 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 regulatory package, the culmination of many years of cooperative effort.

The proposed regulations set forth policies and procedures that faithfully implement the intent of the FVO. The regulations reflect the Department's recognition that TANF and GA cash assistance can play a vital role as a means to escape domestic violence, address safety issues, and become financially



Administrative Office
310 Armistead Road
Holmes, PA 19043
610/543-5022 Fx 610/543-1349

EARN Center
926 W. Allegheny Ave.
Philadelphia, PA 19133
215/226-2600 Fx 215/226-0465

Center for Families
519 Station Road
Warrington, PA 19083
610/459-9177 Fx 610/459-3785

West Philadelphia SLL
3817 Lancaster Ave.
Philadelphia, PA 19104
215/387-1470 Fx 215/222-2720

Truancy Prevention Programs
6101 Limekiln Pike
Philadelphia, PA 19141
215/549-2686 Fx 215/549-2688

South Philadelphia Office
324 Richmond Street
Philadelphia, PA 19125
215/462-5996 Fx 215/462-0944

**Delaware County Teen Mother
Supervised Independent Living**
138 Garrett Road
Upper Darby, PA 19082
610/734-2196 Fx 610/734-2198

West Philadelphia SLL II
297 S. 45th Street
Philadelphia, PA 19159
215/474-4696 Fx 215/474-4695

independent of abusive partners. 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.

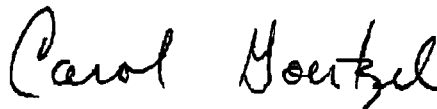
Importantly, the proposed regulations establish strict confidentiality requirements and protocols to ensure the privacy and protection of those who disclose domestic violence and ask for help.

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 adoption of this regulation with a small number of modifications for clarification, as proposed in the joint comments of the Community Justice Project, the Women's Law Project, and Community Legal Services.

Thank you for your consideration of our comments.

Very truly yours,



Carol Goertzel
President/CEO
PathWays PA

cc: **IRRC**
Edwin B. Erickson, Chair, Senate Public Health and Welfare Committee
Vincent J. Hughes, Minority Chair, Senate Public Health and Welfare Committee
Frank Louis Oliver, Majority Chair, House Health and Human Services Committee
George T. Kenney, Jr., Minority Chair, House Health and Human Services Committee



PathWays PA

services and advocacy for women, children and families

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
	Carol Goertzel
COMPANY:	DATE:
PathWays PA	9/15/2008
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
	3
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:
Comments on FVO regulations	

URGENT
 FOR REVIEW
 PLEASE COMMENT
 PLEASE REPLY
 PLEASE RECYCLE

NOTES/COMMENTS:

Please find attached copies of the comments sent to Mr. Zogby by email earlier today. We hope you will feel free to contact us with any questions or concerns.

Recipients:

- IIRC
- Edwin B. Erickson, Chair, Senate Public Health and Welfare Committee
- Vincent J. Hughes, Minority Chair, Senate Public Health and Welfare Committee
- Frank Louis Oliver, Majority Chair, House Health and Human Services Committee
- George T. Kenney, Jr., Minority Chair, House Health and Human Services Committee