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**Episale, Angela**

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14-513-4

**From:** Zogby, Edward J  
**Sent:** Monday, September 15, 2008 10:33 AM  
**To:** Marciano, Melinda B; Episale, Angela  
**Subject:** FW: Comments on Regulation No. 14-513, Codification of the Family Violence Option

2008 SEP 17 PM 2:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

FYI

-----Original Message-----

**From:** Marianne Bellesorte [mailto:mbellesorte@pathwayspa.org]  
**Sent:** Monday, September 15, 2008 10:25 AM  
**To:** Zogby, Edward J  
**Subject:** Comments on Regulation No. 14-513, Codification of the Family Violence Option

Dear Mr. Zogby,

Please find attached comments on Regulation No. 14-513, Codification of the Family Violence Option. Please feel free to contact us with any questions or concerns.

Best wishes,

Marianne

Marianne Bellesorte  
Director of Policy  
PathWays PA

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

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 PWRORA, 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



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**Center for Families**

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Wawa, PA 19063  
610/459-9177 Fx 610/459-3765

**West Philadelphia SIL**

3617 Lancaster Ave.  
Philadelphia, PA 19104  
215/387-1470 Fx 215/222-3720

**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  
215/462-5998 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 SIL II**

237 S. 48th Street  
Philadelphia, PA 19139  
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[www.pathwayspa.org](http://www.pathwayspa.org)

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.

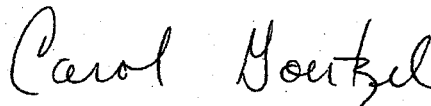
Importantly, the proposed regulations establish strict confidentiality requirements and protocols to ensure the privacy and protection of those who disclose domestic violence and ask for help.

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