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**From:** Rachel Meeks [RMeeks@hungercoalition.org]  
**Sent:** Wednesday, September 16, 2009 9:35 AM  
**To:** IRRC; Jewett, John H.  
**Subject:** Final-Omitted Regulations - Revisions to the Special Allowance for Supportive Services Requirements  
**Attachments:** Final-OmittedRegsLetter\_GPCAH.pdf

To the Independent Regulatory Review Commission,

Please see the attached letter to Chief Deputy Attorney General Robert Mulle regarding Final-Omitted Regulations #14-517 concerning revisions to the special allowance for supportive services requirements that impact the food stamp recipients served by our organization.

Thank you,

Rachel Meeks  
Food Stamp Campaign Manager  
Greater Philadelphia Coalition Against Hunger  
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**VIA FAX (717-705-7244) & FIRST CLASS MAIL**

Robert A. Mulle, Esq.  
Chief Deputy Attorney General  
Office of Attorney General, Legal Review Section  
15<sup>th</sup> Floor, Strawberry Square  
Harrisburg, PA 17120

September 15, 2009

**RE: Final-Omitted Regulations #14-517  
Revisions to the Special Allowance for Supportive Services Requirements**

Dear Mr. Mulle,

We understand that the Department of Public Welfare has recently submitted a package of regulations that would dramatically reduce the availability of special allowances to participants in welfare-to-work programs. The Department is attempting to issue these regulations without the opportunity for public comment, without giving adequate reason for doing so. These regulations would have an extraordinarily harmful effect on our program and the clients with whom we work. We urge you to request the Department to withdraw these regulations and follow the usual route for proposed regulations with the opportunity for public comment.

The Greater Philadelphia Coalition Against Hunger runs a Food Stamp Hotline to help over 5,000 families each year apply for and continue receiving food stamp benefits. Many of our food stamp clients also receive TANF and participate in DPW-funded welfare-to-work programs. Special allowances are extremely important to ensure that our clients are able to succeed in the training and work programs that help them transition away from needing TANF benefits.

Among other things, these regulations would require low-income participants to spend their own meager savings down to zero before receiving any special allowance; impose strict yearly and lifetime limits on special allowances even where families have good reasons to need additional help; and eliminate certain types of special allowances that families had previously been able to receive to help them find work.

In this economy, these special allowances are more important than ever to help low-income Pennsylvanian families obtain employment, education, or training. The Department should not cut these allowances without giving the public the opportunity to weigh in on the effects of the cuts.

Sincerely,

  
Carey Morgan  
Executive Director  
Greater Philadelphia Coalition Against Hunger

CC: Sen. Edwin Erickson, Majority Chair, Senate Public Health & Welfare Cmte.  
Sen. Vincent Hughes, Minority Chair, Senate Public Health & Welfare Cmte.  
Rep. Frank Oliver, Majority Chair, House Health & Human Services Cmte.  
Rep. Matthew Baker, Minority Chair, House Health & Human Services Cmte.  
Independent Regulatory Review Commission