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INDEPENDENT REGULATORY
REVIEW COMMISSION

VIA FAX (717-705-7244) & FIRST CLASS MAIL

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

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 proposed regulations reducing the availability of special allowances to welfare-to-work participants. These regulations would have an extraordinarily harmful effect on our programs and our clients. We urge you to request the Department to withdraw these regulations and instead propose regulations with the opportunity for public comment.

PathWays PA serves over 6,000 women, children, and families in the Greater Philadelphia region and focuses on helping families become self-sufficient. We work with TANF and food stamp recipients through our Center for Families, our supervised independent living sites, our adult education programs, and, of course, at our Philadelphia EARN Center. Our clients use the special allowances in question to prepare for jobs leading to self-sufficient work.

Under the proposed regulations, low-income participants would need to "spend down" their meager savings before receiving any special allowance, a practice that removes any financial cushion remaining and one that impedes the development of good financial habits. The regulations also 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.

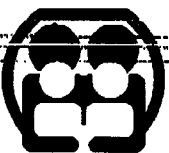
In this economy, these special allowances are more important than ever in providing low-income families with the opportunity to leave government programs and move towards self-sufficiency. Please do not cut these allowances without giving the public the opportunity to weigh in on their effects.

Sincerely yours,

Carol Goertzel

Carol Goertzel
President/CEO
PathWays PA

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



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Administrative Office	Center for Families	Truancy Prevention Programs	Delaware County Teen Mother
210 Arch Street Holmes, PA 19043 610/543-5022 Fx 610/543-1549	578 Chestnut Street Wawa, PA 19063 610/459-9177 Fx 610/459-3765	5101 Chestnut Street Philadelphia, PA 19141 215/549-2686 Fx 215/549-2688	578 Chestnut Street Upper Darby, PA 19082 610/734-2196 Fx 610/734-2198
EARN Center 926 W. Allegheny Ave. Philadelphia, PA 19133 215/226-2600 Fx 215/226-0465	West Philadelphia SIL 3617 Lancaster Ave. Philadelphia, PA 19104 215/387-1470 Fx 215/222-3720	South Philadelphia Office 324 Richmond Street Philadelphia, PA 19125 215/462-5998 Fx 215/462-0944	West Philadelphia SIL II 237 S. 48th Street Philadelphia, PA 19139 215/474-4696 Fx 215/474-4695