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INDEPENDENT REGULATORY
REVIEW COMMISSION

September 18, 2009

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:

JEVS Human Services is a non-profit, nonsectarian social service agency that has been providing services to the Greater Philadelphia community since 1941. Our services – from health and rehabilitation to skills training and job placement – help individuals from all walks of life achieve their personal and economic goals. Last year we served over 20,000 individuals, including 5,395 TANF recipients working toward economic independence. Our Workforce Initiatives programs provide support to individuals in addressing specific barriers to employment, in addition to offering targeted assistance with job planning, placement, and retention.

I am writing in response to the Department of Public Welfare's (DPW) recent submission of a package of regulations that would dramatically reduce the availability of special allowances to participants in JEVS' welfare-to-work programs. I write to object to the Department's circumvention of public comment by issuing these regulations as final-omitted.

Special allowances are payments made for transportation, clothing, books, and other items necessary for TANF recipients to look for work, participate in training, or accept a job. Without these payments, most TANF recipients would be unable to get a job that would enable them to leave the public assistance rolls; in addition, provider agencies like JEVS would face even greater challenges in helping the Commonwealth meet its federally-mandated work participation goals.

Among other things, these proposed 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.

DPW is attempting to issue these regulations without the opportunity for public comment, declaring that the procedures for public input are, "in the circumstances impracticable, unnecessary, or contrary to the public interest." The Department's justification for this assertion is that it is attempting to maximize scarce resources in difficult fiscal times. While this may serve as good cause for *promulgating* new regulations, this contention does not justify bypassing the public comments of those who will feel the new rules' impact. 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.

While reducing government waste and promoting program efficiency are admirable goals, it is important to take a broader view of the circumstances presently facing individuals leaving TANF. In this economy, these special allowances are more important than ever to help low-income Pennsylvanian families obtain employment, education, or training. The Department ought not to cut these allowances without giving the public the opportunity to weigh in on the effects of the cuts.

Thank you for your time and attention to this matter.

Sincerely yours,

A handwritten signature in black ink that reads "Jay Spector". The signature is written in a cursive style with a large, stylized "J" and "S".

Jay Spector
President and CEO

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