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**HACC****Central Pennsylvania's Community College**

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INDEPENDENT REGULATORY  
REVIEW OF ADMISSION

September 23, 2009

John H. Jewett, Regulatory Analyst  
Independent Regulatory Review Commission  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

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

Dear Mr. Jewett:

On behalf of the KEYS Program at Harrisburg Area Community College, I write to strongly oppose the Department of Public Welfare's recently proposed regulations that would severely and unnecessarily limit the availability of welfare-to-work supports for Pennsylvania families.

The KEYS Program provides intensive case management on the community college campus to TANF recipients who are enrolled in a credit bearing program at a community college in Pennsylvania. Our purpose is to reduce barriers to academic success for TANF and Food Stamp in community college so they can earn a degree or certificate and move toward self sufficiency through employment paying a living wage. Our graduates find employment in their field, ending their dependency on welfare benefits. During the course of their academic program, they are reliant on the special allowances for transportation, books and supplies, equipment, and car repair and car purchase assistance. A reduction in the Special Allowances as defined in the new regulations will have a significant negative impact on the ability of our students to succeed. If they do not succeed academically, they drop out of school. If they drop out of school, they cannot obtain employment at a living wage. Consequently, they retain a level of dependency on the welfare system to sustain themselves and their children.

Special allowances allow families receiving TANF or food stamps to obtain employment, education, or training. Current TANF grants pay less than one-third of the poverty line. A family of three, for example, receives only \$403 per month in most Pennsylvania counties. This is simply not enough to pay the costs families face when trying to better themselves and move off of welfare. The Department of Public Welfare's (DPW's) proposals would make it even more difficult for families to escape poverty.

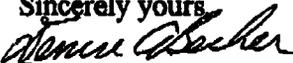
We are most concerned with the following two proposals:

First, the new regulations would require families to spend any savings or funds on hand that they may have before they would qualify for a special allowance. Families sometime save up their money to pay next month's rent or utility bill or purchase school supplies for their children. This new regulation would require families to spend this money before qualifying for DPW assistance in purchasing a bus pass or other transportation costs, paying for GED testing fees, or buying textbooks for training classes. This regulation would frustrate families' attempts to improve their lives and may lead to homelessness and instability, when they should be focused most on bettering themselves through employment or training.

Second, the new regulations would impose low and arbitrary limits on the amount of special allowances that a family might receive. For example, an individual would only be able to receive \$2,000 in her lifetime to spend on books and school supplies, and \$1,500 per year on transportation (including costs for car insurance.) If a family wants to leave welfare for good and obtain a job that pays enough to be self-sufficient, the head of household may need adult basic education or vocational training. Often, there are costs, such as books, associated with these classes that she must pay. If DPW restricts the amount of special allowances that a TANF or food stamp recipient can receive, she will only be able to choose lesser quality job training or none at all. And if she reaches the maximum transportation payment, she may be forced to quit a job or stop looking for one. These arbitrary limits will prevent many people from making enough money to leave welfare behind.

Finally, we object to these regulations being submitted as "final" without the opportunity for advance public comment, with no urgent need to do so. These regulations affect the lives of thousands of Pennsylvanians, and deserve the careful consideration that the normal public comment process affords. We urge that these regulations be withdrawn and resubmitted as proposed regulations.

In this recession, Pennsylvanian families need more help—not less—to obtain quality education and training that will lead to self-sufficient jobs. This package of regulations will only hurt families as they try to work their way out of poverty. We urge the Independent Regulatory Review Commission to reject them.

Sincerely yours  
  
Denise A. Becker  
KEYS Facilitator

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.  
Linda Blanchette, Deputy Secretary for Income Maintenance, DPW