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VIA EMAIL (jjewett@irrc.state.pa.us)

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2009 SEP 23 PM 12:43

RECEIVED

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

Dear Mr. Jewett:

PCCY serves as Southeastern Pennsylvania's leading child advocacy organization and works to improve the lives and life chances of the region's children. On behalf of Public Citizens for Children and Youth (PCCY), we 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.

As of August, 2009, there were nearly 43,000 families with children receiving TANF and 249,697 households receiving food stamps (now technically SNAP, the Supplemental Nutrition Assistance Program) in Bucks, Chester, Delaware, Montgomery and Philadelphia counties. Diminishing access to special allowances as DPW proposes would take away critical support these families need to successfully move forward.

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 in, for example, receives only \$403 per month in most Pennsylvania counties. This amount falls far short of covering basic living expenses for most families and leaves virtually no leeway to pay additional costs families face when trying to build their skills and be competitive in today's job market. 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. That proposed prohibition would punish people from planning ahead, one of the very qualities we should be encouraging. Families sometimes save up their money to pay the next month's rent and utility bills, or purchase school supplies and clothing for their growing children. Many families also must save to build a cushion for sporadic child support payments.

This new regulation would require families to spend this money before qualifying for DPW assistance to purchase a bus pass or other transportation costs, pay for GED testing fees, or buy textbooks for training classes. This regulation would frustrate families' attempts to improve their lives and try to focus on bettering themselves through employment or training; compliance with such a regulation could lead to homelessness and instability..

Second, the new regulations would impose unrealistically low 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 his/her lifetime to spend on books and school supplies, and \$1,500 per year on transportation (including costs for car insurance, a particularly acute need for families in many parts of our region where there is poor e access to public transportation).

Families want to leave welfare and can only successfully do so for the long-term if parents can obtain and sustain employment that pays enough to support their family. To secure such a job, particularly in the current competitive job market, the head of household may need education and/or training. Often there are costs, such as buying books that are necessary. If DPW restricts the amount of special allowances that a TANF or food stamp recipient can receive, she will only be able to choose poor 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 tens of thousands of Pennsylvania children, 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,



Shelly Yanoff

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