

2784

From: Jewett, John H.
Sent: Thursday, September 24, 2009 12:33 PM
To: IRRC; Cooper, Kathy; Geinett, Wanda B.; Wilmarth, Fiona E.; Johnson, Leslie A. Lewis
Subject: FW: Comments on Final-Omitted Regulations #14-517
Attachments: Comments on #14-517 DPW regs to IRRC-TANF-Policy-2009-09-24.pdf

This should be filed as a final comment on #2784.

From: Joe Willard [mailto:jwillard@pec-cares.org]
Sent: Thursday, September 24, 2009 12:23 PM
To: Jewett, John H.
Subject: RE: Comments on Final-Omitted Regulations #14-517

Please find attached our comments, which were omitted in my previous email to you.

From: Joe Willard
Sent: Thursday, September 24, 2009 12:20 PM
To: jjewett@irrc.state.pa.us
Subject: Comments on Final-Omitted Regulations #14-517

Mr. Jewett:

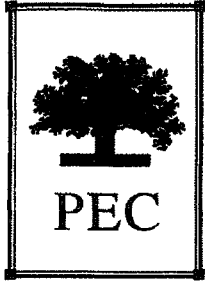
Please find attached comments from the People's Emergency Center regarding the Department of Public Welfare's proposed regulations affecting welfare-to-work supports that would affect homeless moms trying to achieve self-sufficiency.

Please let us know if you have any questions.

Joe Willard

Vice President for Policy
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RECEIVED
2009 SEP 24 PM 12:37
NATIONAL POLICY
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Board Chair

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Shelter & Services
3902 Spring Garden Street
Philadelphia, PA 19104-4655
Phone: 215-382-7522 ext. 210
Fax: 215-349-9099

Welfare to Work
Families First
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Phone: 215-382-7522 ext. 233
Fax: 215-382-1640

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 People's Emergency Center (PEC) 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.

Founded in 1972 by community volunteers as an emergency shelter, PEC has grown to become Pennsylvania's most comprehensive social service agency for homeless families. PEC's services provide families with case management; emergency shelter, food and clothing; transitional housing; on-site child care and health care services; specialized afterschool, teen and summer enrichment programs; mental health services; parent education; employment services; and housing counseling.

Our *Job Opportunity and Business Skills* (JOBS) program was founded in 1993 to assist homeless heads of households to achieve economic independence. JOBS offer homeless parents making the transition from welfare to work a second chance at education and workplace success. The program recruits participants from 16 emergency shelters and transitional housing programs across Philadelphia. JOBS services include: initial assessment, employment advising, workplace readiness workshops, education and training programs, computer skills training, financial literacy workshops, GED classes, and job placement and retention services. These services are supplemented with childcare, transportation subsidies, career clothing, and access to permanent housing.

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



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State law requires us to tell you that PEC is registered as a charitable organization with the Commonwealth. You can obtain a copy of our registration and financial information by calling toll free within Pennsylvania 1-800-732-0999. Registration does not imply endorsement.

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:

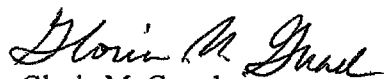
First, the new regulations would require families to spend any savings or funds on hand that they may have before they would qualify for a special allowance. Families in shelter must save at least 60% of their income to assist with startup costs to move into permanent housing and manage their remaining income for regular household expenses such as laundry, children's clothing, healthcare, and payment of delinquent credit obligations. This new regulation would require families to spend their savings before qualifying for DPW assistance. Funds previously set aside for security deposits, utility deposits, and furniture, will now be spent on purchasing a bus pass or other transportation costs, paying for GED testing fees, or buying textbooks for training classes.

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,



Gloria M. Guard
President

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