

2784

From: Jewett, John H.
Sent: Friday, September 25, 2009 8:49 AM
To: IRRC; Cooper, Kathy; Gelnett, Wanda B.; Wilmarth, Fiona E.; Johnson, Leslie A. Lewis
Subject: FW: Comments on DPW regulations from the Coalition for Low Income Pennsylvanians
Attachments: IRRC Comments 9.09.doc

This email or its attachment should be filed as a final comment on #2784

INDEPENDENT REGULATORY
REVIEW COMMISSION
2009 SEP 25 PM 9:06
RECEIVED

From: Kathleen Daugherty [mailto:briggans@paonline.com]
Sent: Friday, September 25, 2009 6:42 AM
To: Jewett, John H.
Cc: eerickson@pasen.gov; mhansarick@pasen.gov; hughes@pasenate.com; cduncan@pasenate.com; foliver@pahouse.net; sbennett@pahouse.net; smitchell@pahouse.net; Nia Wilson; mbaker@pahousegop.com; Melanie Brown; lblanchett@state.pa.us; ezogby@state.pa.us; PZurflieh@palegalaid.net; rweishaupt@clsphila.org; 'Kathy Fisher'; 'Sandy Strauss'
Subject: Comments on DPW regulations from the Coalition for Low Income Pennsylvanians

September 25, 2009

VIA EMAIL (jjewett@irrc.state.pa.us)
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 Coalition for Low Income Pennsylvanians (CLIP), we write with strong opposition to 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.

CLIP is a group of diverse organizations including service providers, legal service advocates, faith, anti-poverty and anti-hunger groups, children's advocacy organizations and community action agencies. Our primary mission is to protect individuals and families who struggle against the ravages of poverty and its effects by advocating for responsible, compassionate, and cost-effective government policies.

Many of our members have submitted comments objecting to the DPW proposed regulations. We write to amplify those objections.

Special allowances allow families receiving TANF or food stamps to move toward escaping poverty by obtaining employment, education, or training. Current TANF grants pay less than one-third of the

poverty line. 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 two of the proposals and with the process:

First, the new regulations would require families to spend any savings or funds they may have before they would qualify for a special allowance. This would frustrate families' attempts to improve their lives and may deteriorate their stability 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 a family might receive. If DPW restricts the amount of special allowances TANF or food stamp recipients can receive, they will only be able to choose lesser quality job training or none at all. 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 you to withdraw these regulations and resubmit them as proposed regulations.

Sincerely,



The Rev. Sandra Strauss
Co-chair



Kathleen Fisher
Co-chair

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

COALITION FOR LOW INCOME
PENNSYLVANIANS

900 S. Arlington Avenue, Suite 100
Harrisburg, PA 17109

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