

2784



RECEIVED

2009 SEP 25 AM 9:25

INDEPENDENT REGULATORY REVIEW COMMISSION

VIA FAX (717-705-7244) & FIRST CLASS MAIL  
Robert A. Mulle, Esq.  
Chief Deputy Attorney General  
Office of Attorney General, Legal Review Section  
15<sup>th</sup> Floor, Strawberry Square, Harrisburg, PA 17120

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

Dear Mr. Mulle:

We understand that the Department of Public Welfare has recently submitted a package of proposed regulations reducing the availability of special allowances to welfare-to-work participants. These regulations would have an extraordinarily harmful effect on our programs and our clients. We urge you to request the Department to withdraw these regulations and instead propose regulations with the opportunity for public comment.

PathWays PA serves over 6,000 women, children, and families in the Greater Philadelphia region and focuses on helping families become self-sufficient. We work with TANF and food stamp recipients through our Center for Families, our supervised independent living sites, our adult education programs, and, of course, at our Philadelphia EARN Center. Our clients use the special allowances in question to prepare for jobs leading to self-sufficient work.

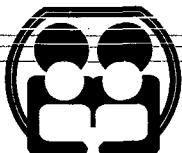
Under the proposed regulations, low-income participants would need to "spend down" their meager savings before receiving any special allowance, a practice that removes any financial cushion remaining and one that impedes the development of good financial habits. The regulations also impose strict yearly 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.

In this economy, these special allowances are more important than ever in providing low-income families with the opportunity to leave government programs and move towards self-sufficiency. Please do not cut these allowances without giving the public the opportunity to weigh in on their effects.

Sincerely yours,

Carol Goertzel  
President/CEO  
PathWays PA

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



The Symbol of Quality  
**COA**  
ACCREDITED

**Administrative Office**  
310 Amosland Road  
Holmes, PA 19043  
610/543-5022 Fx 610/543-1549

**EARN Center**  
926 W. Allegheny Ave.  
Philadelphia, PA 19133  
215/226-2600 Fx 215/226-0465

**Center for Families**  
519 Station Road  
Wawa, PA 19063  
610/459-9177 Fx 610/459-3765

**West Philadelphia SIL**  
3617 Lancaster Ave.  
Philadelphia, PA 19104  
215/387-1470 Fx 215/222-3720

**Truancy Prevention Programs**  
6101 Limekiln Pike  
Philadelphia, PA 19141  
215/549-2686 Fx 215/549-2688

**South Philadelphia Office**  
324 Richmond Street  
Philadelphia, PA 19125  
215/462-5998 Fx 215/462-0944

**Delaware County Teen Mother  
Supervised Independent Living**  
138 Garrett Road  
Upper Darby, PA 19082  
610/734-2196 Fx 610/734-2198

**West Philadelphia SIL II**  
237 S. 48th Street  
Philadelphia, PA 19139  
215/474-4696 Fx 215/474-4695