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www.womenagainstabuse.org



September 18, 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 Women Against Abuse, 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.

Women Against Abuse (WAA) provides quality and compassionate services, in a manner that fosters self respect and independence in persons who have been victimized by domestic violence. In the past year, WAA served 10,937 individuals through emergency shelter, transitional housing, legal, and hotline services. WAA also helps combat domestic violence with advocacy, educational training, and outreach programs.

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.

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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.

If you have any questions please do not hesitate to contact me at 215-386-1280 x.104.

Very truly yours,



Jeannine L. Lisitski,
Executive Director

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