

Community Justice Project and Community Legal Services

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August 31, 2010

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IRRC

Independent Regulatory Reform Commission

333 Market Street, 14th floor
Harrisburg, PA 17101

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Re: Docket number 14-518
"Revisions to Special Allowance for Supportive Services Requirements"

Dear IRRC:

We write this letter in response to the Department of Public Welfare's filing of proposed final regulations, "Revisions to Special Allowance for Supportive Services Requirements," No. 14-518, on August 23, 2010.

Community Legal Services (CLS) and the Community Justice Project (CJP) sent joint comments on this regulatory package at the proposed rulemaking stage. In those comments we expressed opposition to a number of DPW's proposed changes in Supportive Services policy.

Following the close of the comment period, the Department contacted CLS and CJP to discuss the concerns we raised. There followed a series of meetings and other communications through which we were given the opportunity to provide input on modifications to the proposed regulations.

The proposed final regulations address many of the comments we initially raised regarding the proposed rulemaking. Accordingly, while we have some remaining concerns, we do not oppose the Department's proposed final regulations.

Respectfully submitted,

Community Justice Project

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Subject: RE: CLS-CJP Comments on Proposed Final Regulation No. 14-518 - SPALs
Attachments: CLS-CJP Proposed Final SPALs regs comments -- 8-31-10.pdf

Dear Mr. Zogby:

Attached please find comments from Community Legal Services and the Community Justice Project on DPW's proposed final regulations, No. 14-518, "Revisions to Special Allowance for Supportive Services Requirements."

We are also sending these to the IRRC and the majority and minority chairs of the legislative oversight committees.

Thank you,

Peter Zurflieh (CJP)
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Richard Weishaupt (CLS)

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