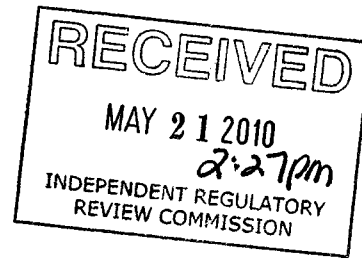
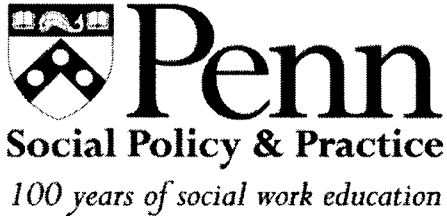


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May 21, 2010

VIA EMAIL (EZogby@state.pa.us; irrc@irrc.state.pa.us )

Edward J. Zogby, Director, Bureau of Policy  
Health and Welfare Building, 4th Floor  
Harrisburg, PA 17105

**RE: Proposed Regulations #14-518  
Revisions to the Special Allowance for Supportive Services Requirements**

Dear Mr. Zogby and Mr. Coccodrilli:

I'm a faculty member in the School of Social Policy & Practice at the University of Pennsylvania. For the past twenty years, I have researched low-income working and job-seeking men and women and also women trying to leave welfare for work in order to better understand what helps and what hinders their economic mobility efforts. To a one, family and public supports in the form of financial help, childcare subsidies, transportation allowances, and tax credits (i.e. the EITC) have enabled these individuals to move closer to or move into self-sufficient economic situations. My own and others' research also emphasizes the importance of temporary stipends while the job seeker (generally a parent) is paying the short-run "opportunity cost" of workforce development training in exchange for long-run gains. Just as clearly, persons—and especially parents—without these kinds of work supports remain on public assistance or disappear into deeper levels of poverty.

My research has been funded by the Annie E. Casey Foundation and some of it is reflected in this recent book: *Jobs Aren't Enough: Toward a New Economic Mobility for Low-Income Families*, 2006, co-author A.L. Armstrong, Temple University Press. I have also trained EARN program supervisors in Philadelphia and conducted earlier Philadelphia-based welfare-to-work research, so I know the landscape intimately.

Therefore, 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's families. Such supports should be expanded rather than limited. Limiting supports is a short-term solution with long-term negative impacts – on the working adults, most of whom are parents, and ultimately on their children who are then more likely to remain in families in poverty or working poverty.

In this recession, Pennsylvania's families need more help — not less — to obtain quality education and training that will lead to jobs with family-sustaining wages – of which

there are too few in the U.S. today. Education, training and employment with adequate supports are keys to such jobs. As such, these regulations will only hurt families as they try to work their way out of poverty.

Sincerely yours,

Roberta Rehner Iversen, Ph.D., M.S.S.  
Associate Professor

CC: Arthur Coccodrilli, Chair, Independent Regulatory Review Commission

2833

**From:** Roberta Iversen [riversen@sp2.upenn.edu]  
**Sent:** Friday, May 21, 2010 2:18 PM  
**To:** ezogby@state.us.pa; IRRC  
**Cc:** pzurflieh@paralegalaid.net; Liz Noll  
**Subject:** Retain SPALS - extend if possible!  
**Attachments:** SPALSRegsResponseLetter5-21-10.doc

Thank you for your attention to my attached letter, regarding DPW's proposed regulations to revise special allowances for supportive services (PALS).

Best regards,  
Roberta Iversen

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