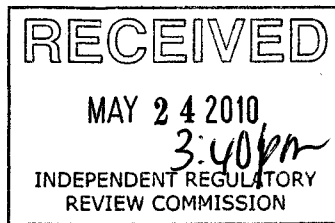


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14-518-10

May 21, 2010

Office of Income Maintenance
Bureau of Policy

VIA EMAIL (EZogby@state.pa.us)

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

MAY 24 2010

REFER TO: _____

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

Dear Mr. Zogby:

On behalf of Montgomery County Community College KEYS Program I write to 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.

I work with the Montgomery County Community College KEYS Program serving TANF and SNAP recipients pursuing certificate and associate degrees at the college on their way to family sustaining jobs. We have just graduated 16 students in areas such as medical assistance, human services, architecture and early childhood education. We presently are working with over 165 students relying on our services and the support of travel, book, and other special allowances to support their education. Many of our former students have moved from dependency on public benefits to careers that support their families. The special allowances they received were integral to their success.

These special allowances allow KEYS participants receiving TANF or SNAP (food stamp) benefits to succeed in their studies and pursuit of employment. Our students are grateful for the support to get needed car repairs, supplies, and other supports. Our students cannot succeed without the required textbooks and supplies. 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 of transportation, books, school supplies and other work supports that 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.

By putting lifetime limits on special allowances such as books and supplies, you are not taking into account the length of time that it takes a single parent dependent on public assistance to complete an associate's degree or certificate. I fear that our students would run out of needed special allowances before their education is completed.

The proposed limits on car repair and car purchase costs will also create a barrier for our students. The kind of car that you can purchase for \$1,500 will need more repair and replacement. By proposing a limit on transportation costs for recipients, you are taking

the opportunity for employment and training away from those living away from low cost public transportation, or those that must take multiple forms of transportation just to attend school or training.

This package of regulations is not necessary, as existing regulations and policies, strengthened last Fall by DPW through sub-regulatory changes, already ensure that work support are issued only to families who prove both that (1) the work supports are needed and (2) the payment is used for its intended purpose. It appears that DPW's main goal is to save money at the expense of the poorest Pennsylvanians – even at the risk of preventing those families from gaining education or jobs enabling them to escape poverty.

I am concerned that the proposed regulations would impose low and arbitrary limits on the amount of critical 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. If a parent reaches the maximum payment for transportation or books and supplies, she may be forced to abandon her education or training, quit a job, or stop looking for work. These arbitrary limits will prevent many people from making enough money to leave welfare behind.

I recommend that these annual and life-time limits be dropped.

I am also troubled by several other provisions:

- Proposed 55 Pa. Code §165.1 (a) appears to require that those who are exempt from RESET (work) requirements as a result of the disability, domestic violence, or other circumstance, but nonetheless wish to volunteer for education or training activities, comply with hours requirements they may not be able to meet consistently. This will discourage clients with barriers from preparing themselves for eventual employment. And, we believe this provision violates the “exempt volunteer” rule in the Pennsylvania Welfare Code at 65 P.S. §405.1(b).

I recommend that DPW delete the proposed language stating that clients “and shall comply with the requirements of the AMR or EDP.”

- Proposed 55 Pa. Code §165.44(b)(2)(viii) would impose a supportive services overpayment for non-compliance with work requirements, without regard to the degree of non-compliance. Under this provision, a client who, for example, attends her program for 29 hours in week, instead of the required 30 hours, could be required to pay back the full amount of supportive services payments issued to her in that week, even though those work supports were actually required and used for their intended purpose.

I recommend that DPW drop subsection (viii) from this proposed regulation.

- Proposed 55 Pa. Code §165.44(a)(2) would create unnecessary red tape by requiring employers and training providers to verify that transportation to the work or training site is required, even when the need for such transportation is readily apparent. Employers should not be asked to prove the obvious, especially as they often have no more knowledge than welfare office staff of the employee's transportation options. Individuals who live more than walking distance from their job or training site should not have to prove they need transportation to get there.

I recommend that DPW add the following exception to the requirement that need be verified: "unless, with regard to the need for transportation, readily available information regarding the travel distance demonstrates the need."

In this recession, Pennsylvanian families need more help — not less — to obtain quality education and training that will lead to self-sufficient jobs. The KEYS program helps TANF and SNAP recipients to rise out of poverty. These special allowances are necessary to this program. These regulations will only hurt families as they try to work their way out of poverty.

Sincerely yours,

Margaret Innes MSS, MSLP
KEYS Program Coordinator
Montgomery County Community College
CH303
340 DeKalb Pike
Blue Bell, PA 19422

CC: Arthur Coccodrilli, Chair, Independent Regulatory Review Commission