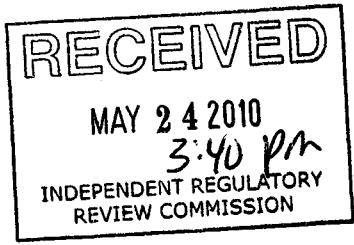


#14-518-7

# WOMEN'S LAW PROJECT

Safeguarding Rights, Creating Opportunities



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May 21, 2010

VIA EMAIL (ezogby@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:

On behalf of the Women's Law Project, I write to oppose the Department of Public Welfare's (DPW) recently proposed regulations that would severely and unnecessarily limit the availability of welfare-to-work supports for Pennsylvania families.

The Women's Law Project is a public interest legal advocacy organization dedicated to safeguarding the rights and creating opportunities for all women. Since 1974, the Law Project has worked to change laws and create systems that better address the pressing needs of women and their families. For over ten years, the Law Project participated on the DPW's Domestic Violence Task Force, assisting DPW in the implementation of the Family Violence Option. The Women's Law Project is concerned about the impact of DPW's proposed regulations on the ability of women, and domestic violence victims in particular, to escape poverty.

Special allowances allow families receiving TANF or SNAP (food stamp) benefits 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 of transportation, books, school supplies and other work supports that families face when trying to better themselves and move off of welfare.

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The limits on supportive services proposed by DPW would make it even more difficult for families to successfully escape poverty. 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. We therefore recommend that these annual and life-time limits be dropped.

We are also extremely troubled by the imposition of hours requirements on persons who are exempt from participation in RESET but who choose to volunteer for education or training programs that could prepare them for eventual employment. Proposed 55 Pa. Code §165.1(a) conflicts with the "exempt volunteer" rule in the Pennsylvania Welfare Code at 65 P.S. §405.1(b), which expressly allows persons who are exempt from RESET requirements to voluntarily participate in education and training activities and neither requires a specific number of hours nor authorizes adverse actions against volunteers who do not meet an hour requirement.

Moreover, the imposition of an hours requirement will place domestic violence victims in an untenable position. DPW's volunteer policy has greatly benefitted individuals such as domestic violence victims, who are unable to meet work requirements but whose employment prospects are enhanced by engaging in volunteer activities consistent with physical, emotional, family, and safety considerations. An hours requirement will render volunteering unavailable for individuals who, through circumstances out of their control, are unable to meet such a requirement and represents a step backward for a department that has, through the adoption of the Family Violence Option, otherwise demonstrated its sensitivity to the plight of domestic violence survivors. We therefore recommend that DPW delete from proposed 55 Pa. Code §165.1(a) the additional language "and shall comply with the requirements of the AMR or EDP."

In addition to the specific concerns addressed above, the Women's Law Project generally shares the concerns expressed by the Community Justice Project and Community Legal Services in their comments and incorporates by reference their recommendations to DPW to amend its proposed rulemaking.

Thank you for your consideration of these comments

Sincerely yours,

  
Terry L. Fromson

cc: Arthur Coccodrilli, Chair, Independent Regulatory Review Commission