

#14-518-18

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May 24, 2010

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



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Dear Mr. Zogby:

This letter is in reference to the Department of Public Welfare's (DPW) proposed regulations titled, "Revisions to the Special Allowance for Supportive Services Requirements (# 14-518). The Career Wardrobe appreciates the opportunity to present our comments.

According to DPW these regulations are needed to bring greater accountability to this important program while ensuring that these very important supports remain available for those who need them to be able to move from Temporary Assistance for Needy Families (TANF), General Assistance (GA), and SNAP into employment.

The Career Wardrobe supports increases in accountability from Government and nonprofit sectors. We also understand that changes to supplemental services needed to allow more individuals to participate in the programs designed to assist them move from welfare to work and economic independence, while at the same time financial resources are decreasing for such programs.

For the past two years, The Career Wardrobe has been a partner with DPW's PA WORKWEAR program, which is a pilot program working to increase accountability for the money spent to provide professional clothing and uniforms for individuals involved in training, job search or employment.

In the new regulations, this initiative is addressed in the following regulation: question 19 #3 "changes in the Clothing and Uniform policy which allows an annual maximum limit of \$150, and an initiative to obtain clothing from public or nonprofit sources at no cost to the participants."

The Career Wardrobe is supportive of PA WORKWEAR and DPW's initiative in ensuring that clothing allowances are spent in a necessary manner. Furthermore, the restructuring of this program is clearly saving DPW from waste and over-spending as stated in response to question 21, "the maximum allowance for purchase of required clothing has been adjusted to more adequately reflect the costs of goods and services."

If feasible, we would offer that the regulation be further expanded to directly mention and provide administrative funding for the PA WORKWEAR initiative. Even by providing donated clothing at no cost to the client, nonprofit agencies like The Career Wardrobe have costs associated with collecting and distributing this clothing as well as the additional costs of purchasing clothing for training which is not feasible to have donated (such as uniforms).

Our support for PA WORKWEAR and the proposed regulatory changes comes from our studies show that participation in The Career Wardrobe (or similar) programs are integral to successful job searching/employment. Employers routinely state that employment decisions often hinge on factors such as which individual displayed the most professional appearance during her initial interview.

A national research study conducted by Women Work: The National Network of Women's Employment, supports this assessment on the importance of a professional appearance on the job. Of 1,000 respondents, the majority agreed that a woman's appearance on the job affected:

- Her own confidence in her ability to do her job well (78%)
- Whether or not she is taken seriously (76%)
- Whether or not she will be considered for a raise or promotion (64%)

Additionally, women with less education (high school level or lower) reported being less confident in their ability to dress professionally and appropriately for the workplace. This leaves low-income women vulnerable to being perceived as less prepared or unable to perform well in their new positions, regardless of their skills or job performance.

The service The Career Wardrobe and other PA WORKWEAR providers play is key to assisting low-income women transition to work. After visiting The Career Wardrobe, a woman is equipped with both the knowledge of how to dress and act professionally and provided with the clothing she needs to project a positive professional image.

Again, we are supportive of the efforts of DPW to control costs, increase accountability and increase the number of participants who can benefit from supportive services allowances. We are also mindful that these regulations should be amended only as they provide the best possible support for Pennsylvania's neediest individuals.

Thank you again for the opportunity to comment and take The Career Wardrobe's letter under consideration.

Sincerely,

Executive Director