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# Just Harvest

EDUCATION FUND

<b>RECEIVED</b>	# 14-518-23
MAY 26 2010	<i>Building understanding about hunger since 1987</i>
INDEPENDENT REGULATORY REVIEW COMMISSION	16 Terminal Way Pittsburgh, PA 15219 Phone: (412) 431-8960 Fax: (412) 431-8966

May 24, 2010

VIA EMAIL (EZogby@state.pa.us)

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

Office of Income Maintenance  
Bureau of Policy

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 **Just Harvest**, 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.

The Welfare Justice Project is a project of Just Harvest. Just Harvest is a membership organization which promotes economic justice and works to influence public policy and to educate, empower, and mobilize the citizens of our community toward the elimination of hunger and poverty. Of the many projects we have to address hunger and poverty, the Welfare Justice Project advocates for a more compassionate welfare system because we believe that every person has the right to a dignified life, a voice in the decisions that affect them, and the hope of achieving self-sufficiency.

Special allowances were the life lines that helped provide me with the opportunity to achieve self-sufficiency. Several years ago I found myself separated from an abusive husband and raising a child alone. I knew that without education and training, my daughter and I would be subject to poverty and hardship. I went on cash assistance and enrolled in the SPOC Program. If it had not been the support I received through that program and special allowances, I would not be where I am today. I was unable to get financial aid due to default on a previous loan, therefore without the special allowances to purchase my books and supplies I would not have completed my degree at Community College. It took me three years to complete a two-year program and I am concerned that parents like me may be denied the opportunity to complete their education and training programs if the proposed regulations become final. I work with parents day in and day out who want nothing more than to achieve self-sufficiency and pay into the system rather than take from it, but they need the support of a compassionate DPW to do that.

**Just Harvest is an Equal Opportunity/Affirmative Action Employer**

Winner of the Congressional Hunger Center's 1997 and 2001 Victory Against Hunger Award, World Hunger Year's 1993 Harry Chapin Food Self-Reliance Award, and the Pa. Public Health Association's 1993 Rodale Award for Health Promotion.

A copy of the official registration and financial information may be obtained from the Pa. Department of State by calling toll-free, within Pa., 1-800-732-0999. Registration does not imply endorsement.

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. The Department of Public Welfare's (DPW's) proposals would make it even more difficult for families to escape poverty.

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.

We are most 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.

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

We are 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).

We 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.

We 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.

We 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. These regulations will only hurt families as they try to work their way out of poverty.

Sincerely yours,

Rochelle Jackson  
Advocate/Organizer  
Welfare Justice Project of Just Harvest

CC: Arthur Coccodrilli, Chair, Independent Regulatory Review Commission