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EMPOWERING CHILDREN, ADULTS, FAMILIES, AND COMMUNITIES FOR OVER 100 YEARS

Elise Bruhl, Esq., President, Board of Directors
Rose M. Brandt, Executive Director

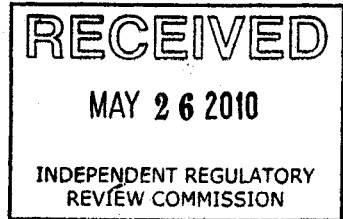
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Office of Income Maintenance
Bureau of Policy

May 24, 2010

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VIA EMAIL (EZogby@state.pa.us)



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

REFER TO: _____

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

Dear Mr. Zogby:

On behalf of Lutheran Settlement House, 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.

Founded over 100 years ago, Lutheran Settlement House's mission is "to empower individuals, families, and communities to achieve and maintain self-sufficiency through an integrated program of social, educational, and advocacy services" As part of its mission, every year LSH educates low-income adults seeking adult basic education or a GED. Many of those individuals can only afford to come to LSH because the welfare office provides them a transportation allowance, and many others rely on special allowances from the welfare office to pay for books and GED test fees. LSH also counsels domestic violence victims seeking to escape their abuser; welfare-to-work supports are often a lifeline to safety for these women.

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.

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

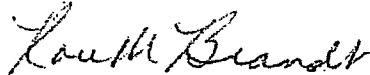
abandon her education or training, quit a job, or stop looking for work. These arbitrary limits will prevent many people from making enough money to leave welfare behind. We recommend that these annual and life-time limits be dropped.

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. 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.

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,



Rose Brandt,
Executive Director

CC: Arthur Coccodrilli, Chair, Independent Regulatory Review Commission