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#14-518-24



Rec'd
5/26/10
IRRC

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:

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). We appreciate the ability to present our comments. While we understand that further accountability is necessary at both the federal and state level to ensure that TANF dollars continue reaching families in need, we do have some concerns with the proposed regulations. We do not want to see families lose access to programs due to overly extensive requirements.

PathWays PA, a nonprofit organization serving over 6000 women, children, and families in the Greater Philadelphia region, focuses much of its efforts on helping TANF recipients move from government programs into self-sufficiency. We work with TANF and food stamp recipients at our Center for Families, our supervised independent living centers, our adult and financial literacy programs, and of course at our EARN Center in Philadelphia. The special allowances that clients under TANF receive give them the opportunity to enter job training programs or find work that allows them to move towards self-sufficiency.

Specific provisions that give us pause include:

- Proposed 55 Pa. Code §165.44(b)(2)(viii), which imposes a full reimbursement for supportive services due to non-compliance with work requirements, without regard to the degree of non-compliance. In our work with TANF participants, we have seen workers lose hours without warning due to changes in their workplace and through no fault of their own. 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

EARN Center
926 West Allegheny Avenue
Philadelphia, PA 19133
215-226-2600 / Fx 215-228-3980

Center for Families
Wawa, PA 19063
610-459-9177 / Fx 610-459-3765

Supervised Independent Living / Financial Path\$
3617 Lancaster Avenue
Philadelphia, PA 19104
215-387-1470 / Fx 215-222-3673

Truancy Programs
4700 Wissahickon Ave. Building C, Suite 101
Philadelphia, PA 19144
215-549-2686 / Fx 215-549-2688

Philadelphia In Home Services
324 Richmond Street
Philadelphia, PA 19125
215-462-5998 / Fx 215-462-0944

Transitional Living Program
4911 Walnut St.
Philadelphia, PA 19139
215-921-9672 / Fx 215-921-9674

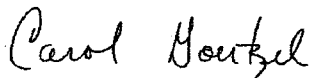


work supports were needed and used for their intended purpose. We recommend that DPW reconsider and drop subsection (viii) from this proposed regulation.

- Proposed 55 Pa. Code §165.1 (a), which appears to require participants who are exempt from RESET (work) requirements as a result of the disability, domestic violence, or other circumstance to meet hours requirements when they volunteer for education and training programs. Based on our experience, it is in the interest of TANF participants and of the state for volunteer opportunities to be made available, since these opportunities allow participants to improve their skills and move closer to self-sufficiency while managing their extenuating circumstances. However, by forcing clients coping with severe problems to meet certain hours restrictions, this code minimizes the likelihood of participants taking advantage of the opportunity to volunteer. Additionally, this provision may violate the “exempt volunteer” rule in the Pennsylvania Welfare Code at 65 P.S. §405.1(b). We recommend that this language be deleted.

We would be happy to discuss these comments with you further if needed. Thank you for the opportunity to submit these comments.

Very truly yours,



President/CEO
PathWays PA