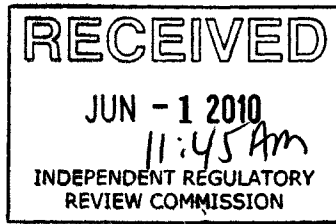


#14-518-37

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May 25, 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 Philadelphia Workforce Development Corporation 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 Philadelphia Workforce Development Corporation (PWDC) is a non-profit corporation whose Board of Directors is appointed by the Mayor of the City of Philadelphia. As fiscal agent for the City for federal and state employment and training funds, PWDC is responsible for overseeing these funds. PWDC is dedicated to improving the region's economy by supporting workforce development initiatives with funding and technical assistance. Annually, over \$100 million dollars are invested by PWDC in employment and training initiatives through Requests for Proposals (RFP) or Customized Job Training efforts. These investments are designed to increase the capacity of the system to provide services for unemployed and underemployed individuals. As a result of these investments, multiple objectives are met which help maintain the foundation for improvements in the quality of life for individuals as well as improvements in the local economy. Investments are made through two operational divisions of PWDC – the Transitional Workforce Division (welfare-to-work) and the Workforce Services Division (general public).

In partnership with the Pennsylvania Department of Public Welfare, PWDC's Transitional Workforce Division oversees the delivery of services to the city's adult welfare population. Services are primarily delivered through the EARN (Employment, Advancement and Retention Network) System. This network of neighborhood based centers throughout the city helps over 16,000 families each year move from welfare to economic self-sufficiency.

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,

Daisy Rosa
Senior VP, TWD

CC: Arthur Coccodrilli, Chair, Independent Regulatory Review Commission