



LEGAL SERVICES TO END HOMELESSNESS



HAP STAFF

**Acting Executive Director/
Managing Attorney**
Michele Levy, Esq.

Senior Staff Attorney
Patricia Malley, Esq.

**Veterans Project Director/
Advocacy Director**
Michael Taub, Esq.

CYF Project Director
Laura Kolb, Esq.

Staff Attorneys
Alie Muolo, Esq.
Margaret Retz, Esq.
Joel Sobel, Esq.

Paralegals
Patrick Brogan
Kay Lawal
Patrick McNeil
Melissa Stafford, MSW

Social Worker
Evan Dubchansky, MSW, LSW

Director of Development
Alexandra Morigi

Grants Manager
Ann Mintz

Director of Operations
Tanya L. Rambert

Office Administrator
Margianne P. Smith

Office Assistant
Joy Harris

January 18, 2021

Submitted via email: RA-Oimcommets@pa.gov

Cathy Buhrig, Director, Bureau of Policy
Department of Human Services
Office of Income Maintenance, Room 230
1006 Hemlock Drive, P.O. Box 2675
Harrisburg, PA 17110-3595

Re: Notice of Proposed Rulemaking -Definitions and Redetermination Regulations – OIM 14-550

Dear Ms. Buhrig,

The Homeless Advocacy Project (HAP) submits these comments in support of the Department of Human Services' (Department) proposed rulemaking (NPRM or proposed rule) regarding the interview process for applicants and recipients of Temporary Assistance for Needy Families (TANF).

HAP is a free legal services program for adults, unaccompanied youth, and families who are experiencing homelessness or at imminent risk of becoming homeless. HAP's clients reside in homeless shelters, abandoned buildings, doubled up with family members, on the city streets, and in other types of transient living situations. In addition, they frequently struggle with debilitating psychiatric impairments, intellectual limitations and physical conditions that further hamper their ability to navigate the myriad systems under which they are eligible for supports and services. As a legal aid organization whose mission is to protect and promote access to vital public benefits for clients living in extreme poverty, we strongly support the proposed changes that would provide expanded interview options to TANF applicants and recipients.

The proposed amendments would remove the requirement for face-to-face interviews during the application and redetermination process and add a new definition for "personal interview" that could be completed "by phone, in person or by other means approved by the Department". These expanded interview options would remove significant barriers for HAP clients who typically lack funds for transportation and child care and for whom a face-to-face interview might also mean a days' lost wages. In addition to extreme poverty, many HAP clients seeking TANF benefits struggle with psychiatric,

cognitive and physical impairments that further limit their ability to effectively follow through with in-person appointments.

However, the majority of HAP clients could participate in required TANF interviews over the phone, an option that would result in fewer missed appointments, while avoiding travel and child-care costs and saving time for everyone involved. Similarly, the expanded interview options would allow clients already receiving TANF to more easily comply with redetermination requirements, resulting in fewer denials and loss of benefits due to purely technical issues, such as a missed face-to-face interview. The increased flexibility contemplated by the removal of the face-to-face requirement would benefit both HAP clients and the Department by streamlining TANF application and redetermination processes and ensuring that eligible families receive the vital support they need.

For the foregoing reasons, HAP strongly supports the NPRM regarding the expansion of the interview process for applicants and recipients of TANF. Thank you for the opportunity to submit comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Kolb', with a stylized, cursive script.

Laura Kolb
Children, Youth & Families Director
Homeless Advocacy Project

