



United for CHOICE!

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September 28, 2016

Thomas E. Perez
Secretary of Labor United States Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Dear Secretary Perez:

A-TEAM Wisconsin is a volunteer grassroots movement made up of people with disabilities, their families, guardians and caregivers. We have 13 chapters throughout the state, and are continuing to grow nationally with groups in Nevada, Missouri, Arkansas, Pennsylvania, and Washington. Our mission is to advance the options and opportunities for people with cognitive disabilities, through the preservation of choice in employment.

We are aware that the Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities has submitted its report to you. While some of the recommendations in the report are quite sound, others concern us. We believe that the committee membership was biased from the start against CRP's, that the "self-advocates" on the committee were not representative of the I/DD community (they were executives and professionals-obviously extremely skilled), and that they gave little consideration to the concerns of families, guardians and caregivers of significantly cognitively disabled adults (who support a full array of employment choices including sheltered employment), let alone CRP professionals.

According to the report, there are 228,600 people earning a special minimum wage under Section 14(c) of the Fair Labor Standards Act. The ACICIEID committee recommends the phase out of 14(c) as a way of increasing Community Integrated Employment (CIE). Section 14(c) was drafted in order to provide employment opportunities for people with significant disabilities. While technology has made a difference for some people there are still many American's who cannot, even with reasonable accommodations, work in a manner and at a pace that would allow them to earn minimum wage. The elimination of 14(c) will cause those people to lose their jobs. The committee did no analysis of the consequences of their recommendation to phase out 14(c). The report itself seems to admit there will be negative, or "unintended consequences" for individuals currently receiving services from organizations using 14(c), and that a "mitigation plan" will be needed for these individuals. We think it is irresponsible to make a recommendation without considering the consequences of the recommendation. Why do we need to eliminate 14(c) through dictate? If the beliefs of this committee are correct, then 14(c) will disappear of its own accord as people with disabilities move, of their own volition, into CIE.

While we support reforms that expand employment opportunities for people with disabilities, eliminating 14(c) will harm and isolate people with disabilities. The elimination of one opportunity does not create another in its place. While public policy can eliminate the special minimum wage, it cannot guarantee private sector jobs. Nearly 80 percent of people with disabilities nationwide are not working in the community. This is not because 14(c) exists but because the market does not create significant opportunities for those with extremely limited skills.

Sincerely,

(Insert Name and contact email/phone number)
Big Lake Chapter