



Megan Cross
Program Director
Opportunities Unlimited
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September 21, 2015

Division of Regulations, Legislation, and Interpretation, Wage and Hour
U.S. Department of Labor
Room S-3502
200 Constitution Ave. NW
Washington, DC 20210
Re: Control Number 1235-0001

To Whom It May Concern;

Thank you for soliciting comments concerning the revision of the section 14c certificate, we appreciate the opportunity to provide feedback as an organization that currently does employ workers with disabilities at the special minimum wage.

While I can appreciate the advocacy efforts for individuals with disabilities to earn minimum wage, our organization will not be able to sustain a program where we are paying individuals \$7.25/hr or more when our reimbursement is coming from the state level, local schools or through Medicaid Waivers. As you can surmise our rate of reimbursement from these entities is not enough to pay for individuals a minimum wage, job coaches salary, training opportunities and material for the job coaches, transportation into the community and administrative staff to assist with oversight and help ensure that we are working within the regulatory guidelines of the Department of Labor, Federal Medicaid and the school system.

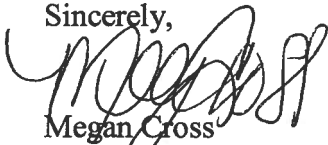
The services we provide as an organization range from work in a "workshop" setting, supported employment, Pre Vocational services, Ticket to Work program and also working with individual that have been referred to us from our local workforce development center. As an organization we would also like to embrace employment for individuals we support in the community setting but we've also seen firsthand that local employers are not ready to employ individuals with disabilities, if at all, but especially at the rate a "typical" individual would receive. In those situations we intervene and provide enclave and supported employment in the community where otherwise those opportunities wouldn't exist.



I would strongly encourage more research be completed to understand which organizations are currently using the 14c certificate and why before it eliminates the use of this certification entirely. If this certification becomes eliminated the exact opposite effect will be felt for individuals with disabilities; organizations that used to provide services and advocacy will no longer be in existence. Programs cannot be sustained in which they pay out more than they bring in. When those programs are gone who will be teaching job readiness skills, working with employers and partnering with schools to prepare younger individuals for the work force?

If you have any questions or would like to request any further information please feel free to contact me at (712) 277-8295. Again, thank you for your time and attention to this very important topic.

Sincerely,

A handwritten signature in black ink, appearing to read 'Megan Cross', written over the printed name.

Megan Cross

Program Director

Opportunities Unlimited