

Waterman, Robert - WHD

From: Miller, Casey <casey.miller@dhhs.nc.gov>
Sent: Thursday, October 01, 2015 1:40 PM
To: WHDPRAComments
Cc: Miller, Casey; Tetterton, Jackie
Subject: Comments regarding proposed revisions to Section 14 (c) certificate application forms

After reviewing the proposed changes to the forms I have one comment. Let me say that I work for a government agency that primarily runs as a training facility, however we do have consumers who are eligible to participate in work. We do not however have any contract work. The work our consumers participate in is almost completely work performed around our facility doing things such as cleaning, cooking, keeping up the grounds, etc. That being said, it seems that we would have a problem completing #8 (Prevailing Wage Survey For Workers Paid Hourly Wage Rates), page 2 of the WH-226. Part (a) under #8 would be a Yes for us because we do pay hourly subminimum wage rates. However, part (b) is requesting information on the contract which the employer employed the largest number of workers. As I stated above, we do not have any contract work, so it would be impossible to complete this section as it is written. Additionally, since part (c) is requesting Prevailing Wage Survey information for the contract identified in section (b), we would also not be able to complete this section. Now, it would not be a problem for us to provide Prevailing Wage Survey information on any of our work areas, but the new revisions seem to only address employers with contracts. I know that we are in the minority, in that we do not perform contract work, but I also know we are not the only facility that pays subminimum hourly wage rates to workers with disabilities without having contract work. If the new revisions are adopted as is, I would hope there would be some more specific instructions included to advise facilities like ours as to how we should proceed with this section.

Thank you for the opportunity to review the new proposals and provide feedback. I hope that you will consider the difficulty facilities such as ours would face if section 8 remains as it is. Thanks again for your time.

Casey Miller
N.C. Department of Health and Human Services
Community Production Coordinator, Division of Vocational Rehabilitation Services
902 Corporate Dr.
Goldsboro, NC 27534
Phone: 919-739-8243
Fax: 919-739-8250
Casey.miller@dhhs.nc.gov
<https://www.ncdhhs.gov/dvrs>

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized State official. Unauthorized disclosure of juvenile, health, legally privileged, or otherwise confidential information, including confidential information relating to an ongoing State procurement effort, is prohibited by law. If you have received this email in error, please notify the sender immediately and delete all records of this email.