

Waterman, Robert - WHD

From: Linda Rea <Linda.Rea@centerstone.org>
Sent: Thursday, September 24, 2015 1:31 PM
To: WHDPRAComments
Cc: Rob Ford
Subject: 14(c) Proposed Revisions
Attachments: 150922143451_0001 (2).tif

Attached is Centerstone of Illinois' letter regarding the proposed revisions.

*Linda M. Rea
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Vocational and Residential Services
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SPREAD THE WORD
TO END THE WORD

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September 22, 2015

Division of Regulation, Legislation and Interpretation
Wage and Hour, U.S. Department of Labor, Room S-3502
200 Constitution Avenue, NW
Washington, D.C. 20210

Re: Proposed Revision to Section 14(c) Certificate Application Forms
Control Number 1235-0001

To Division of Regulation, Legislation and Interpretation,

As a service provider for individuals with developmental disabilities and/or severe mental illness for over 45 years, our private, not-for-profit community agency believes the elimination of Section 14(c) would be a catastrophic blow to the individuals Centerstone of Illinois currently serve in our vocational program.

Section 14(c) was enacted to help individuals whose disabilities were so severe it hampered or eliminated their ability to acquire and sustain employment. We utilize 14(c) as a tool to provide the individuals we serve with meaningful site-based and community employment. Basically, 14(c) leveled the playing field and allowed individuals with disabilities the opportunity to work and be compensated for their labor based on their own abilities, not the norm established by an employer, and for which these individuals could not compete with other workers for in the general labor pool.

In a competitive work environment, the individuals we serve would not, in most situations, be employed. The elimination of 14(c) and/or Work Centers would have the impact of eliminating opportunities for approximately 150 individuals (at our agency alone) with a variety of disabilities to earn a paycheck, pay taxes, and live a more normal life, which we understand to be the primary reason the regulation was enacted.

Centerstone staff strongly support, promote, and advocate that every individual we serve deserves the opportunity to live and work in their communities. This, however, is a struggle even with the opportunities presented through 14(c). Given the functioning capacity and employment capabilities of severe and profoundly disabled adults, we submit 14(c) should continue to be available to every individual who faces a major vocational disability. Those we serve have been told all their life what they can't do. Section 14(c), to a large extent, allows our service recipients the opportunity to be productive and to demonstrate, in a real life compensable way, what they can do.

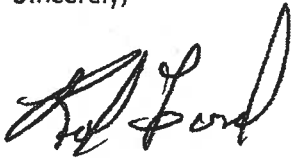
We ask that you carefully consider the ramifications of the proposed revisions to Section 14(c) and take the necessary steps to act on behalf of individuals with developmental disabilities and/or severe mental illness by allowing them continued opportunities for productive work and employment through the special certificate wage system.

September 22, 2015

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If you have questions or need additional information to help you act on behalf of individuals with disabilities (or wish to come and visit our work site and talk with our service recipients), please contact either of us at the number below.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Ford", written in a cursive style.

Rob Ford, Director of Vocational and Residential Services

A handwritten signature in black ink, appearing to read "Brad Friend", written in a cursive style.

Brad Friend, Assistant Director of Vocational Services
Centerstone of Illinois
902 W Main Street
West Frankfort, IL 62896
618- 937-6483