

Waterman, Robert - WHD

From: jray mdgh.org <jray@mdgh.org>
Sent: Monday, September 21, 2015 2:08 PM
To: WHDPRAComments
Subject: Control Number 1235-0001
Attachments: DOL letter.docx

Attached is our response to your proposed revisions in regards to 14(c).

Sincerely,

James L. Ray

U.S. Department of Labor
Wage and Hour Division
Washington D.C. 20210

September 17, 2015

I would like to comment on the proposed revisions per Control Number 1235-0001.

My name is James L. Ray. I have a Master of Education degree from The College of New Jersey with a major in International Administration and Supervision. I have worked all over the world in various capacities. I moved back to Oklahoma fifteen years ago and took the job as Executive Director for Mid-Del Group Home, Inc., a private, nonprofit corporation that provides residential and vocational services to intellectually disabled adults. I had never heard of group homes or sheltered workshops until then. This opportunity to work with these individuals has been the most rewarding experience of my life.

I would like to tell you a few things I have learned since joining this great company:

1. When I first started I also thought that the intellectually disabled clients I serve could do well in a normal work setting. I placed several of my higher functioning people into jobs in the community. Each one, after just a few months, chose to come back to our workshop with their peers and friends.
2. The city in which we are located, Midwest City, Oklahoma, is very supportive of our programs and employees. When hired, I was asked to make the public more aware of what we do, which I did by speaking at the local civic clubs and taking our people with me and letting them tell their own stories. They have always been well received. Everyone who tours our group homes and workshop are always amazed at how enthusiastic the clients are about their work and their wonderful housing.
3. Our clients aren't doing just "make work." We have contracts with a towel and uniform company in which we bag and fold 30,000-35,000 towels per day. We fill 1,000-2000 bags with sand, weigh, seal, and ship them to a martial arts company every day. We pick up litter at a local college. We make garage sale stakes for the City of Midwest City. If you go to our website www.mdgh.org you can see for yourself how happy and productive the clients are. However, I feel confident that these contracts would be terminated by the companies if I had to pass on to them the cost of paying minimum wage to our clients.
4. Our employees are healthy, social, and live and shop in our community. They go on outings on weekends and are as self-sufficient as their disability allows them to be.
5. MDGH has been in business since 1983. It has no debt and all the money made in the company goes toward making the lives of the clients happier and better.

The proposed revisions would end all that. Mid-Del Group Home, Inc. could not survive without the "profit" generated by the sheltered workshop which makes all of the corporation's other activities possible including the group homes. If I had to pay the clients minimum wage, the workshop would no longer be "profitable" and would likely be closed because it couldn't sustain even itself which would then lead to the group homes being shut down too. It has been my

experience, and research substantiates it, that these intellectually disabled adults have a difficult to impossible chance of finding mainstream employment in the first place, and an even more difficult time staying employed if they do find it. This ultimately would lead to their having no place to work and no place to live. The Oklahoma Department of Human Services would then have to find someplace to put them where they would sit around with no viable work, no sense of contributing to society, so they would sit and watch TV and eat themselves into oblivion, leading them to greater health issues and earlier death.

It is my sincere hope that this proposal will not be validated and put into effect.

James L. Ray
Executive Director