

## Waterman, Robert - WHD

---

**From:** Pam Jensen <pamjensen@uvah.org>  
**Sent:** Friday, October 02, 2015 5:18 PM  
**To:** WHDPRAComments  
**Subject:** Comments on Control Number 1235-0001  
**Attachments:** Comments regarding the propose 14.docx

Thank you for taking these comments.

Pam

This e-mail message from Ukiah Valley Association for Habilitation and all attachments transmitted may be privileged or confidential and protected from disclosure. If you are not the recipient, you are hereby notified that any dissemination, distribution, copying or taking any action based on it is strictly prohibited and may have legal consequences. If you have received this e-mail in error, please notify the sender by reply e-mail and destroy the original message and all copies.



This email has been checked for viruses by Avast antivirus software.

[www.avast.com](http://www.avast.com)

Comments regarding the propose 14(c) certificate application forms  
Control number 1235-0001

WH-226A Item 7 (c)

The revised forms ask if any workers were age 24 or under when employer first paid them a minimum wage. This question alone does not provide any information about career counseling services, training opportunities information required by WIOA or whether individuals with disabilities have been furnished pre-hire vocational services or career counseling as required by section 511 of the Rehabilitation Act.

What entity is responsible for obtaining this information? Will DOL notify the proper entity so they can ensure the services are provided in a timely manner? Will DOL gather information regarding the provision of these services in their audits?

WH-226A Item 7 (e-g)

It is not clear how the additional work history data gathered under the proposed items will prevent the curtailment of opportunities for employment of workers with disabilities or enhance enforcement. Please explain.

Productivity is but one measure of a person's ability to obtain and maintain competitive employment. Please explain how the additional information will be used to determine if an individual should be employed in a competitive workplace.

How will the data collected be used to assess whether a certificate is needed to prevent the loss of employment opportunities?

WH-226A Item 7 (d) instructions

The accommodation examples only include examples of technology accommodations. Other accommodations such as job coaching, work hours, break times, modified job duties are often utilized on competitive and sheltered work environments.

Submitted by Pamela Jensen  
Executive Director  
Ukiah Valley Association for Habilitation  
Ukiah, California  
October 2, 2015