

## Waterman, Robert - WHD

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**From:** Marcy Svenningsen <marcy.svenningsen@odcvc.com>  
**Sent:** Monday, September 21, 2015 12:53 PM  
**To:** WHDPRAComments  
**Subject:** Control Number 1235-0001

Division of Regulations, Legislation, and Interpretation  
Wage and Hour  
US Dept of Labor  
Room S-3502  
200 Constitution Avenue, NW  
Washington, D.C. 20210

I would like to submit comments regarding the proposed revision of the Application for Authority to Employ Workers with Disabilities at Subminimum Wages. I am most concerned about the proposed changes to WH-226A. The proposed supplementary data sheet will dramatically increase the amount of time necessary to gather all the required information that is being requested. We have a main establishment, three branches and twelve supported employment sites. Previously we had to make sure that all of the individuals we serve were listed at the site where their primary job was located and what their average hourly wage was. I always included a list of jobs where depending on any given day, any of our individuals may be asked to work if work is available. On the proposed form, it is asking for us to break out the wages for each site where the individual works and then list them on all the sites where they perform work. At our facility, we clean at the twelve supported employment sites. One person may work at several of those locations and we will have to list that person on several forms. Their hourly wage will not change because they are performing the same work at each location that they were time studied for. This will be very burdensome for us without the DOL really gaining any new meaningful information.

Thank you for your consideration of my comments.

Sincerely,

Marcy Svenningsen  
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