

From: Cheryl Felak
Sent: Thursday, November 9, 2017 4:25 PM
To: Bull, Karina
Subject: Sub-minimum wage ruling questions

Dear Ms. Bull,

I am writing to follow up regarding my concerns and the concerns of many other families and people in the area who disagree with the recommendation of the Seattle Commission for People with Disabilities. There are many flaws in the so-called "evidence" that the PwD Commission provided and the opinions and concerns of those affected by this decision was totally ignored.

The PwD Commission does not have any representation of the population that is affected by intellectual disabilities. (ID) People with ID are typically the people who are able to work under the special certificate. Eliminating this option, eliminates jobs and opportunities, it forces these people into isolation. Unfortunately, the PwD Commission did not research the issue well nor did they take into account how this affects everything else in the system that is used by the population - housing, job training, availability of appropriate job coaches, transportation, care giving, healthcare and other aspects of a meaningful life.

After several requests of the PwD Commission to provide their research and evidence on the issue of sub-minimum wage they did finally send me some documents. None of the documents they provided had anything pertaining to the employees and employers in Seattle. In addition to the lack of evidence the commission has been able to produce, the documents they provided for their research are outdated. The documents actually do not support the recommendation of the PwD Commission to have a rapid elimination of the special certificates. In fact, the resources provided by the PwD Commission strongly oppose a rapid elimination understanding that such an action would cause more harm than good.

Below are the documents that were provided to me as the research done by the PwD Commission. Before any more action is taken on this issue, it would be very helpful to have current and accurate evidence based research - not merely opinion - to back up these recommendations that will greatly affect people in our community.

APSE'S CALL TO PHASE OUT SUB-MINIMUM WAGE BY 2014

-

"In calling for phase out of sub-minimum wage, APSE recognizes the importance of undertaking such action in a way that is carefully thought out, and leads to movement of individuals currently being paid sub-minimum wage into individual, integrated employment opportunities paying minimum wage or higher, and avoiding unintended consequences that would not only damage efforts to expand community employment, but result in actual loss of rights and opportunities for individuals with disabilities to full integration and inclusion in society."

DECLARATION IN SUPPORT OF INTEGRATED EMPLOYMENT AND AT LEAST MINIMUM WAGES FOR ALL PEOPLE WITH DISABILITIES APRIL 2016 -

- a value statement of the organization - not research or evidence but they do state "The transformation to equal wages and integrated community employment for ALL must be planned and systematic to ensure that no one is left behind."

NATIONAL COUNCIL ON DISABILITY REPORT ON SUBMINIMUM WAGE AND SUPPORTED EMPLOYMENT

The central theme of our recommendations is that the 14(c) program should be phased-out gradually as part of a systems change effort that enhances existing resources and creates new mechanisms for supporting individuals in obtaining integrated employment and other non-work services. The comprehensive system of supports we propose is designed to improve opportunities for persons with disabilities. NCD recommends a phase-out of the 14(c) program rather than immediate repeal

because those who have been in the program for many years need time to transition to a supported employment environment. Our comprehensive approach includes formal requirements of mandatory information-sharing to workers, as well as informal systems of peer support and incentives to states and providers to expand supported employment services in integrated settings.

WE ARE AGAINST SUBMINIMUM WAGE AND WORKING IN SHELTERED WORKSHOPS - no research - opinion of this trained self-advocacy organization - Self Advocates in Leadership (SAIL)

I would urge the Office of Labor Standards to look at the research and understand how various systems work together in supporting this particular population. Rash decisions based on the opinion of a few activists who are unaware of the full impact of these recommendations will only cause harm.

Thank you again for your consideration to this issue.

Cheryl

Cheryl Felak, RN, BSN
Because We Care - Beyond Inclusion
Seattle, WA
www.becausewecare1.com

Member of:
[Developmental Disabilities Nurses Association](#)
[American Academy of Developmental Medicine and Dentistry](#)