



September 9, 2024

Senate Health, Education, Labor & Pensions (HELP) Committee
428 Dirksen Senate Office Building
Washington, DC 20510-6300

Dear Chair Sanders, Ranking Member Cassidy, and all Members of the Senate HELP Committee,

The Consortium for Constituents with Disabilities (CCD) Employment and Training Task Force is pleased to continue supporting the Transformation to Competitive Integrated Employment Act (TCIEA, S. 533). Further, we urge the HELP Committee to both include TCIEA in its broader workforce development package and ensure TCIEA's passage this congressional session.

CCD is a coalition of national rights, advocacy, consumer, provider, and self-advocates organizations representing the nation's 61 million people with disabilities (PWD). The Employment and Training Task Force concerns ourselves with policies and programs affecting PWD's ability to achieve economic self-sufficiency through competitive integrated employment (CIE).

TCIEA provides the funding and technical assistance necessary for states and employers to prioritize CIE for people with disabilities as the bill gradually sunsets the 14(c) program over five years. To date, 11 states have fully enacted legislation to eliminate the subminimum wage, three have eliminated it without any legislation or official policy action, and four are actively phasing it out.¹ If passed, this legislation will ensure that ALL workers with disabilities have the right to earn at least the Federal minimum wage in integrated employment settings, just like workers without disabilities. This is a necessary step in achieving the full intent of the Americans with Disabilities Act (ADA), which aims to advance economic self-sufficiency and ensure basic civil rights for people with disabilities. Furthermore, the Workforce Innovation and Opportunity Act (WIOA) of 2014 established competitive integrated employment as a priority, ensuring that people with disabilities work in mainstream jobs alongside, and are paid comparable wages to co-workers without disabilities.

We support the efforts currently underway to end the use of 14(c) certificates under the Fair Labor Standards Act. An effective phase-out of Section 14(c) must involve the building of necessary infrastructure and supports to ensure that better alternatives are available during and after the transition. TCIEA provides that infrastructure and comprehensive support through grant programs and technical assistance to assist with the transition. This is an important piece of legislation that will create a pathway to support the transition for the 42,134 people with disabilities earning subminimum wage under 14(c) certificates.²

Additionally, we strongly recommend that members of Congress visit worksites and community rehabilitation

¹ Association of People Supporting Employment First (2024, July). *Trends and Current Status of 14(c)*. Retrieved from <https://apse.org/wp-content/uploads/2024/08/APSE-14c-Update-REV-Jul24.pdf>

² U.S. Department of Labor, Wage and Hour Division Section (2024, July 1). *14(c) Certificate Holders*. Retrieved from <https://www.dol.gov/agencies/whd/workers-with-disabilities/section-14c/certificate-holders>

programs that have already gone through a transition away from 14(c) to learn about their experiences. Members of the CCD Employment and Training Task Force welcome the opportunity to work with the Senate HELP Committee to arrange for these tours.

We thank you for your commitment to these issues and are available to answer any questions you may have. please feel free to contact any of the Task Force Co-chairs with any questions - Julie J. Christensen, APSE, julie@apse.org; Alicia Epstein, SourceAmerica, aepstein@sourceamerica.org; and Rick Webster, National Industries for the Blind, rwebster@nib.org.

Sincerely,

Access Ready Inc.
American Association of People with Disabilities (AAPD)
American Council of the Blind
American Network of Community Options and Resources (ANCOR)
Association of People Supporting Employment First (APSE)
Association of University Centers on Disabilities
Autism Society of America
Autistic Self Advocacy Network
Disability Belongs™
Disability Rights Education and Defense Fund (DREDF)
National Association of Councils on Developmental Disabilities (NACCD)
National Association of State Directors of Developmental Disabilities Services
National Center for Learning Disabilities
National Disability Rights Network
National Down Syndrome Congress
National Down Syndrome Society
National Industries for the Blind
National Partnership for Women & Families
SourceAmerica