



August 21, 2017

The Honorable Betsy DeVos
Secretary of Education
US Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Madame Secretary,

I am gravely concerned, as are many of the professionals working in the disability field, about the implementation of the Workforce Innovation and Opportunities Act (WIOA) and the Rehabilitation Act's impact on people who are blind or visually impaired.

The rule change illustrated in Section 361.5 (c) (15), which eliminates the homemaker exemption from Vocational Rehabilitation is detrimental to successful client outcomes achieved by people served through the community-based and center-based vision rehabilitation programs at Bosma Enterprises. Based on our staff's decades of experience in the field of blind services and vision rehabilitation, we know for the last 30 years, the homemaker exemption has been instrumental in the successful integration of these people back into their homes, community and workforce.

Many of our clients lost their sight as adults and do not know how they will survive independently in their home and community without vision; much less acquire and maintain a job. Utilizing the homemaker exemption to provide training in these instances provides clients an opportunity to regain their confidence to function independently. Once clients have mastered basic skills, they realized they could be gainfully employed. If it were not for the homemaker exemption, these clients may never have gained the confidence necessary to reintegrate into the workforce.

In addition to the aforementioned people served by the homemaker exemption, we serve the growing population of senior citizens. America's aging population experiencing vision loss is expected to double over the next 13 years. Fifty-four percent of the clients served by our organization last year through the homemaker exemption were over the age of 55. As demand continues to increase, funding to serve these clients is decreasing. The dollars allocated to each state through the Older Independent Blind Grant is minimal compared to the amount of dollars needed to serve these deserving citizens. Additionally, it is much more cost effective to help people with disabilities remain in their homes as opposed to placing them into assisted living or nursing homes. The removal of the homemaker provision for people coping with disabilities will

result in a significant increase in the number of seniors moving into more restrictive and costly settings.

In addition to providing critical training to people through the homemaker exemption, our organization employs hundreds of people. Fifty-two percent of our employees are blind or visually impaired, employed at all levels of the company from leadership to entry-level employees. All workers receive good wages, a benefits package and the opportunity for upward mobility. We exceed our direct labor requirements while being a wholly integrated workplace. Organizations throughout the nation must be evaluated on their individual merits, not on participation in an employment programs like AbilityOne or state use. Furthermore, job candidates must be presented with all employment choices that fit their qualification and experience. Not-for-profits who execute AbilityOne contracts should be an option for these job seekers as these are good paying jobs with benefits.

I recommend the Department of Education reconsider its decision to remove the homemaker exemption. Additionally, the agency should determine whether an organization is a competitive work environment on a case by case basis and preserve a consumer's right to choose where they want to work.

Respectfully submitted,

A handwritten signature in cursive script that reads "Lou MoneyMaker". The ink is a light brown or tan color.

Lou Moneymaker
Bosma Enterprises
President & CEO