

This commentary conveys our concerns over the Rehabilitative Services Agency's (RSA) interpretation of the Work Force Innovation and Opportunity Act (WIOA) and its impact on Vector Industries and local adults with developmental disabilities who choose to work.

As CEO of Vector Industries, Inc., I am proud to state that our mission is to *operate a successful business that employs and trains persons with diverse disabilities to enable them to reach their potential as productive community members*. Founded in 1969 and located in Waynesboro, Virginia, Vector is a not for profit 501(c) 3 organization that employs disabled and non-disabled adults.

Vector at a glance:

- Located in a 82,000 square foot manufacturing facility
- 86 current employees- 72% earning at or above minimum wage; 27 % paid commensurate wages
- Self-sufficient in that **88 %** of our revenue comes from work we do for local manufacturers
- Major customers include: Reynolds Consumer Goods, Hollister, Devils Backbone, Anheuser-Busch, Graphic Packaging, Supply One, PCG Education, and Hershey Chocolate
- Receives no Medicaid funding
- Provides reliable, door-to-door transportation to 66% of our employees
- Runs one single fundraising campaign to offset the cost of transportation

The RSA, in its narrow interpretation of WIOA, has created a monumental barrier to employment for individuals with disabilities in our geographic region. In the past, individuals with significant disabilities, who had tried and failed with other employers have found and sustained successful and meaningful employment at Vector. They benefit from a flexible work schedule (12-24 hours per week) and special accommodations, such as transportation to and from our facility.

For perspective, DARS effectiveness is measured by "successful employment outcomes." DARS considers an individual who works 1-4 hours per week washing dishes at a restaurant making \$7.25 per hour a successful employment outcome. If this individual does not have a driver's license or access to public transportation, DARS assumes that the individual can sustain employment using "natural supports"- depending on family or coworkers to get to and from the job. The data reflects that this scenario results in a cycle of short term employment and long term unemployment.

Since the passing of WIOA and the RSA's narrow definition of "competitive and integrated work environments," our state DARS has been prohibited from referring employees to us.

In fact, in a letter from Commissioner James A. Rothrock of the Virginia Department of Aging and Rehabilitative Services to The Honorable Senator Emmet W. Hanger (Senate of Virginia), the Commissioner cites the specific policy guideline that the states must take, "that settings established by community rehabilitation programs specifically for the purpose of employing individuals with disabilities (e.g. sheltered workshops) do not constitute integrated settings because these settings are not typically found in the competitive labor market." This SINGLE interpretation has eliminated a significant CHOICE for many individuals with disabilities in our area.

We have worked with our local DARS office to resume referrals but have been instructed to change our business model and revise our mission. We have been asked to remove the word “disabilities” from our mission statement. Moreover, to be considered for future referrals, we would be required to end employment for those receiving subminimum wages, or raise them to minimum wage which would put our organization at risk. Ending employment for our employees who choose to work at Vector would mean 22 individuals would go home serving no valuable purpose to themselves, their families economic stability, and the communities in which they live. It would also deny them the dignity of work.

The RSA’s interpretation of WIOA limits job opportunities for people with disabilities. These Americans must be able to choose where they work and what work they want to do, just like any other American. As implemented, the RSA’s interpretation of WIOA is discriminating against the very population it is designed to benefit.

Amy, an employee at Vector for 13 years is a good example. Amy is a 46 year old female who has muscular dystrophy and mild intellectual disability. She has trouble walking or standing so she requires a wheelchair. Amy lives with her mother and father. For many years Amy worked as a data entry clerk, however when her family relocated to the area she could not find work in any capacity. Her father found Vector and Amy has been meaningfully employed ever since. There is dignity in Amy’s work.

Kristy is another example. Kristy is a medically fragile 24 year old, paraplegic with a tracheostomy, poor vision, and cognitive impairments. She is the only one of triplets with physical and developmental disabilities. In post high school, Kristy came to Vector for work experience and wanted desperately to work for Vector upon graduation. Most importantly, she wanted to have a job and make money like her two brothers. Both her parents work but her mother transports Kristy in a specialized van and she has an aide with her at all times. Due to these logistical issues, Kristy cannot work as many hours as she would like but Vector accommodates her schedule. There is dignity in Kristy’s work.

And then there is Ingold, a 65 year old man with intellectual disabilities whose family helped found Vector Industries. Ingold just celebrated his 45<sup>th</sup> anniversary with Vector. Until recently he lived in his own house next door to his mother. He swims for an hour each morning at the YMCA before coming to work. Unlike some of our employees, Ingold has very strong family support. He doesn’t have to work but he chooses to do so. There is dignity in Ingold’s work.

We have plenty of work. Since the DARS referrals were discontinued, there have been countless missed employment opportunities for talented Virginians with disabilities who want to work. This is the sad consequence of a policy that was put into place without proper consideration and careful thought.

We respectfully request that portions of the WIOA be rescinded to allow for VR referrals to organizations like Vector Industries.

Christine M. Johnston, CEO  
Cheryl S. Moran, Director of Human Resources  
Vector Industries  
1300 Hopeman Parkway  
Waynesboro, VA 22980