



August 10, 2017

Ms. Hilary Malawer  
Assistant General Counsel, Office of the General Counsel  
U.S. Department of Education  
400 Maryland Ave SW, Room 6E231  
Washington, DC 20202

RE: Docket ID: ED-2017-OS-0074

Dear Ms. Malawer:

I want to take this opportunity to request reconsideration for the Department's new interpretation of what constitutes "competitive integrated employment" as now defined in the WIOA regulations, specifically as it applies to the AbilityOne Program.

The definition included the change of one word from "environment" to "unit" and with that, essentially disqualified thousands of quality jobs from being considered as allowable placements by state vocational rehabilitation programs across the country. The AbilityOne Program (authorized under the JWOD Act) mandates that 75% of the direct labor hours performed on a contract be accomplished by people with severe (significant) disabilities. Most of the service (versus commodity) contracts are performed in government spaces and provide for substantial interaction with government employees, military personnel, and/or the general public. When the definition of "integrated" was focused on the work environment these factors provided for integration. When WIOA changed the word from work "environment" to work "unit" the interaction with people other than co-workers was negated as a factor of consideration.

To effectively remove high-paying jobs with medical benefits from consideration for persons relying upon their vocational rehabilitation counselors to help guide them in their job search is ludicrous, but the position that the change in one word has created.

Respectfully,

  
Richard Gilmartin, President

**Global Connections to Employment, Inc.** / an affiliate of Lakeview Center, Inc.

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