WIOA response:

1. I question the necessity of annual meetings between the WIOA representative and guardian and consumer. Many guardians live hours away from the individuals they represent. It is difficult to arrange when they are already expected to attend annual and semi-annual progress report meetings and a MN-Choice assessment in Minnesota a month before their annual meeting. Once an initial meeting happens, the guardian and consumer should not have to attend the same presentation every year for the rest of their life, but rather have the ability to contact the WIOA representative if they changed their mind and wish to pursue competitive employment the next year. When guardians are told this needs to be done annually for the rest of their child's life, they are quite surprised (not in a good way) and question who came up with this idea!

2. Arranging these meetings between the guardian and WIOA representative is a major time commitment for the program directors of the work programs. It often takes repeated phone calls and emails, as well as mailings to finally arrange the meeting. The WIOA representative (who is paid for this process) just walks in and expects everything to be ready for them to present their information. Program directors and the programs that are responsible to set up these meetings must do so without any reimbursement for their time and work this into their already often busy schedule. Why should only the WIOA representative be paid when most of the work lies on the shoulder of the program directors. The work programs should receive some payment for their work as well!

3. There has been very limited information on how the process proceeds once an individual does express interest in community employment at minimum wage. We had two individuals of the 48 people we work with express interest and yet six months later nothing has progressed and our WIOA representative has done nothing to further the process and seems clueless on where to go from here.

4. This rule has a major impact on individuals under the age of 25 that have graduated from school. They are literally in a void with no programming, no employment training and no chance to earn money without their vocational rehabilitation representative vigorously pursuing employment options for them. From our personal experience, this is not working. We know of an individual that has been involved in the process for over a year with little done to move the process along. She should be allowed to work at a facility with a sub minimum wage certificate while this process proceeds until she is placed in a minimum wage earning job. It is odd that there is a belief amongst some individuals and legislators that facilities that provide sub minimum wage jobs have no benefit for individuals. These facilities provide job training, a paycheck, job exploration, training on following directions, using a time clock, staying on task, following a schedule, etc. These are all skills that are necessary to hold a community job, yet they will not learn these skills until they are employed at a minimum wage job. A business is not going to want to pay minimum wages indefinitely while a person learns these skills in addition to learning to do the task they are being paid for. How many businesses will continue to employ a person that will take months and months of training to learn to use a time clock or to stay on task? Not everyone learns at the same pace.

5. The Workforce Innovation and Opportunities Act seems to suggests that everyone needs and wants to work at a competitive job at minimum wage. Our experience suggests otherwise. In the state of Minnesota nearly 12,000 individuals went through the WIOA interviews and less than 17% were interested in competitive employment in the community. People with disabilities should have the same rights as everyone else when it comes to choosing the type of employment that interests them. Some people may never be successful at competitive employment in the community and if you feel differently, you need to visit with individuals that work in day training and habilitation facilities in Minnesota and talk to their families and guardians. My guess is people in Minnesota don't differ much from people in other states. Community work is great for some people, but others would rather work with their friends in an environment that encourages growth and success, but won't terminate them after a few mistakes or disagreements with their supervisor. I worry that individuals that are clearly not ready for competitive employment will try and fail at these jobs and cause businesses to be leery and unwilling to try other persons with disabilities in the future due to unsuccessful attempts in the past. I have seen firsthand many instances where this is the case.

Loren