

## Workforce Innovation Opportunity Act

The Federal Government has finalized new laws that change the process Vodec uses to provide Vocational Services.

We understand how important this training is to our Consumers and their families/guardians, so we want to take this opportunity to explain what is happening and what you can expect from Vodec going forward. This is a significant transition for us. We ask for your patience, communication of concerns and support as we implement these new rules and iron out the kinks.

Our pre-vocational training Service includes a sheltered work option. This type of employment provides a sub-minimum wage for workers whose disability impacts their “productive capacity.” We employ them at our Centers in an environment designed to accommodate their individual needs.

Vodec’s ability to provide this environment is governed by section 14(c) of the Fair Labor Standards Act, which authorizes companies to pro-rate wages for individuals with disabilities.

This type of work environment has its opponents. There are plenty of people who believe everyone should have a community job. These new regulations push section 14(c) — and Vocational Services as a whole — in that direction.

The amended law is weighted to provide a more comprehensive approach for people who are just entering the work force. The government has defined that as anyone younger than 25 years old.

**As of June 22, 2016, Vodec will require every Employment Training Services Applicant who hasn’t reached his or her 25th birthday to produce three documents:**

1. A letter from the State Vocational Rehabilitation (VR) office authorizing Transition Services under the Individual with Disabilities Act (IDEA) and/or pre-employment Transition Services under the Workforce Innovation and Opportunity Act (WIOA)
2. Documentation from VR verifying the applicant applied for their Services and was either found ineligible OR eligible with a closed case. This second option would apply to a person who had an Individual Plan for Employment which then failed to result in employment.
3. Verification from VR that the applicant received career counseling

Without these documents, these applicants are no longer eligible to begin sheltered work.

**Applicants who have passed their 25th birthday** will be required to receive annual career counseling and have it documented in their Individual Career Plan (ICP) in order to continue sheltered work. For our Consumers who are already in sheltered work, this is a step that Vodec will help coordinate and verify with case managers.

Consumers who do not meet these requirements will no longer be eligible for sub-minimum wages or sheltered work.

As an industry, Service Providers are constantly looking for common sense solutions that fit the wide range of ability levels and desire for traditional work in the populations we serve. Vodec will continue to do so.

We know that change is difficult. We are all navigating this change together. Our commitment is ***still*** to helping each and every one of our Consumers reach their Full Potential. We are optimistic that this change will have a positive impact on that goal.

Our Community Employment Team is already developing new programs and reaching out to new businesses to make these new requirements successful in moving more people to community jobs.

As we make this transition, you may notice some variance in the paychecks for some Consumers. There may be short periods of time where rather than running afoul of the law, we pay a full minimum wage to Consumers who temporarily do not qualify for a sub-minimum wage. Transparency is always our goal. If you have a question, please do not hesitate to ask. We will do our best to keep open lines of communication with you, and provide resources for additional information if you need it.

Like always, we are leaning into the challenge. We have built a flexible business model that allows us to respond to these kinds of changes quickly and efficiently.

We are in this transition together.

Sincerely,

Steve Hodapp  
Vodec CEO