



HB 420; SB 417

Labor and Employment - Minimum
Wage - Individuals With Disabilities
(Ken Capone Equal Employment Act)

Issue White Paper
Of:
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EXECUTIVE SUMMARY

Since 1963, Melwood Horticultural Training Center, Inc. (Melwood) has been advocating for and empowering individuals of differing abilities to transform their lives through unique opportunities to work and play in the community. As Maryland's second largest provider of services for people with differing abilities, we are pleased to see the General Assembly's consideration of legislation prohibiting paying sub-minimum wage to workers with differing abilities. Melwood's recent history serves as a model for eliminating reliance on sub-minimum wage payments without negatively impacting employment or services. Our experience offers just one example of just how this can be accomplished.

When I joined Melwood in 2013, the Board of Directors and leadership team began drafting our Strategic Plan. We reaffirmed the Melwood Vision of "A world where people with differing abilities are fully included." We then examined what it would take to realize that Vision, beginning with our own policies, processes and plans. We questioned Melwood's use of Section 14(c) of the FLSA and then questioned whether its use prevented Melwood from realizing the world that we envision.

We recognized that Section 14(c) stood counter to our vision, but we also understood that eliminating it would be a big change that could jeopardize Melwood's ability to operate and provide critical services to people with differing abilities. We recognized the significant financial impact this would have on Melwood's operations and services. Nevertheless, we took the first step toward eliminating our reliance on Section 14(c) of the FLSA in July 2013 by deciding that we would no longer use Section 14(c) to pay employees with differing abilities less than the statutory minimum wage, which at the time was \$7.25 per hour. We kept our Special Minimum Wage Certificate, however, and continued to pay a productivity-based wage less than the U.S. Department of Labor's (USDOL) Wage Determination Rate (WDR) to workers with differing abilities on federal contracts, while still paying more than the statutory minimum wage.

In the years that followed, we contemplated the total elimination of Section 14(c), we analyzed the costs, and we readied ourselves for a change. We looked at new technology and evaluated different ways of doing work to offset any potential inefficiencies resulting from such a change.

After three years, and with the full support of the Melwood Board of Directors, I am happy to announce that we have fully eliminated Melwood's use of Section 14(c) of the FLSA and no longer pay sub-minimum wages. We believed that the financial cost of discontinuing the practice was not only manageable, but was also a prudent investment in our mission to advocate for people with differing abilities. The change directly impacted 396 employees with differing abilities, at 28 work locations in the Baltimore-Washington corridor, Southern Maryland, and at Aberdeen Proving Ground.

This white paper was drafted to summarize not only the general issues surrounding 14(c) and subminimum wage payments, but also to provide you with Melwood's story. We believe our journey can be used as a model for successfully eliminating subminimum wage payments to people with differing abilities in Maryland.

We have demonstrated that Maryland organizations can successfully and effectively ensure that individuals with disabilities receive support and supported employment, according to the needs and preferences of the individuals with disabilities in an integrated setting without paying a subminimum wage. We believe that this is the right social, moral, and economically justifiable thing to do.

If I can ever be of assistance as you contemplate this legislation, please do not hesitate to contact my office at (301) 599-4516.

Thank you for your advocacy for full inclusion for people with differing abilities in the American workforce. On behalf of the people we serve, we appreciate your leadership.



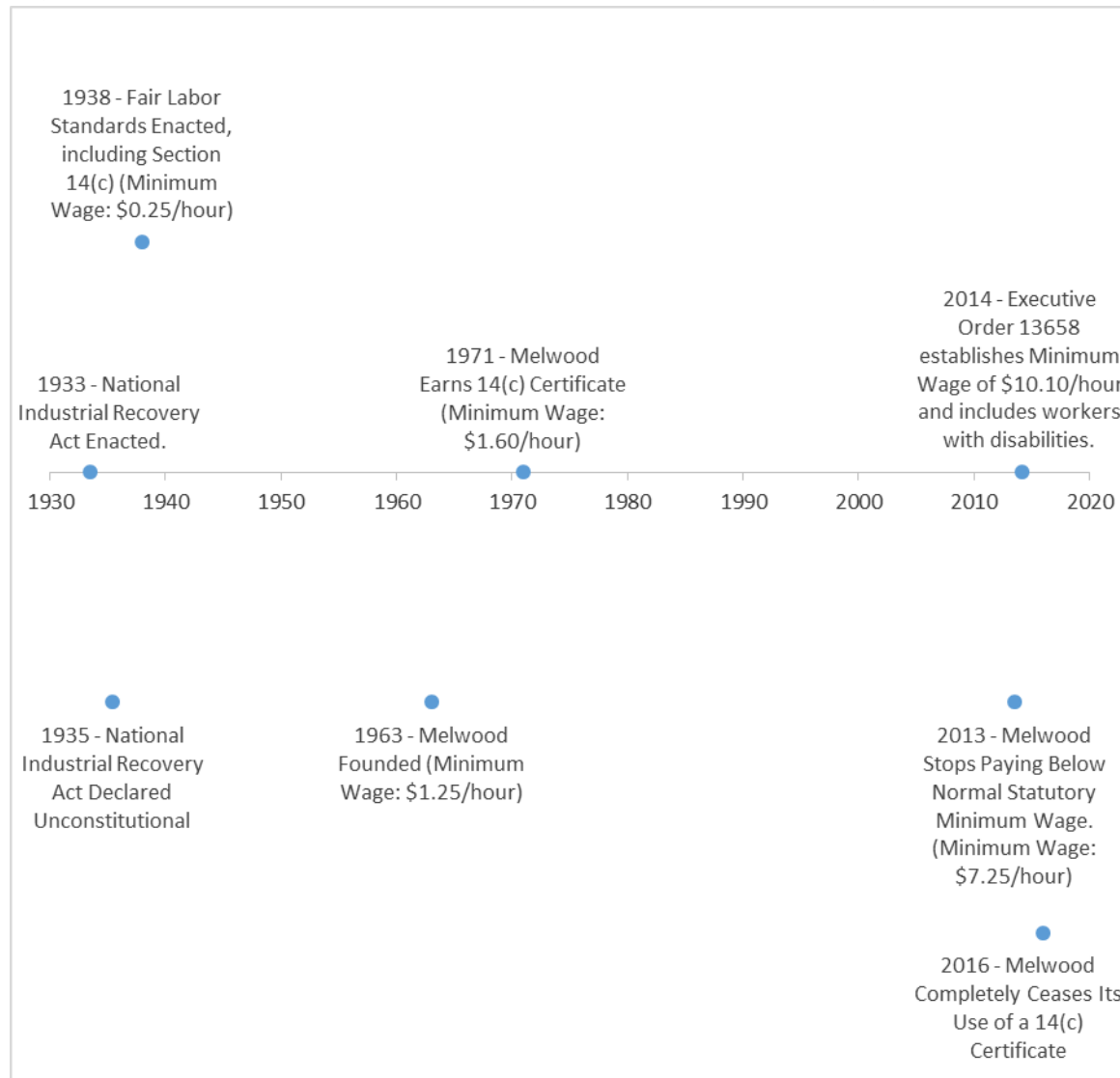
Date: February 10, 2016

Cari DeSantis
President and CEO

BACKGROUND

Section 14(c) of the Fair Labor Standards Act (FLSA)

Figure 1. A Timeline of Productivity-based Wages for People with Disabilities



The concept of productivity-based wages for persons with disabilities arranged through a system of certificates dates back to the National Industrial Recovery Act (NIRA) of 1933-1935. It was last codified in the 1938 adoption of the FLSA. Despite evolving social understanding and improved adaptive technologies, its provisions have gone basically unchanged in the past seventy-eight years.

Section 14(c) of the FLSA allows employers to pay wages below the federal minimum to employees who have disabilities¹ that directly affect their job performance. Employers are able to do this through a Special Minimum Wage Certificate obtained from the U.S. Department of Labor's (USDOL) Wage and Hour Division (WHD). The special minimum wage rate must be commensurate with those rates paid to workers without disabilities in the region for essentially the same type, quantity and quality of work.

An employer with a Special Minimum Wage Certificate must review productivity/wage rates for individuals paid on an hourly basis at least once every six months. This is done by conducting a Time Study. An employee with a disability is timed performing the key tasks of the employee's job. That time is then compared to a standard time for each task, which is set by timing three proficient non-disabled employees performing the same tasks and then calculating the average of their times. In addition, employers must review the wages of all employees at least annually to reflect changes in the prevailing wages paid to experienced workers without disabilities for essentially the same type of work.

Workers covered by the special wage certificate and their guardians, as applicable, must be informed orally and in writing of the terms of the Special Minimum Wage Certificate.

Workers with disabilities paid at special minimum wages may petition the WHD Administrator for a review of their wage rates by an administrative law judge.

Public Perception of Section 14(c)

The general public discussion around Section 14(c) and the payment of subminimum wages often centers on the payment of wages far below minimum wage in segregated work centers known as sheltered workshops. In 2001, the Government Accountability Office found that 95% of all workers being paid less than minimum wage under the Section 14(c) program were employed by sheltered workshops.² Due to this fact, much

¹ For purposes of this document, we use the term "disability" rather than the Melwood preferred term of "differing ability" because we are referencing a section of the law that defines "disability" in a very specific way that is narrower than what may be considered a differing ability. For example, the USDOL finds that educational disabilities do not ordinarily affect productive capacity for purposes of paying commensurate wage rates and, as such, would not ordinarily include an educational disability in its definition of "disabled" under Section 14(c) of the FLSA. 29 CFR Ch. V §525.3.

² Gen. Accounting Off., Special Minimum Wage Program: Centers Offer Employment and Support Services to Workers with Disabilities, But Labor Should Improve Oversight 9 (2001).

of the public discussion on this topic references sheltered workshops, piece-rate wages, and non-competitive employment.

The vast majority of people agree that there are issues with the current implementation of Section 14(c). These concerns include the ability of the USDOL to effectively implement and enforce the law, and the law's effectiveness at creating opportunities for work in the mainstream workforce. In some cases, the USDOL's inability to effectively enforce and implement the law has resulted in exploitive employment practices.

Many also believe that Section 14(c) has not kept up with the evolving trends and attitudes in society regarding people with disabilities. They argue that the 78-year old provision does not account for modern adaptive technology, improved understanding of disabilities, and our more inclusive social mores.

There are three primary actions that are being discussed in order to address these concerns:

1. Immediate elimination of Section 14(c);
2. Implementation of a planned phase-out of Section 14(c); and
3. Continued implementation of Section 14(c) with increased oversight.

Those calling for immediate elimination of Section 14(c) usually frame the matter as a civil rights issue that needlessly segregates and exploits a minority. This viewpoint is often espoused by self-advocates, who believe the issue is one of discrimination. Few national organizations recommend immediate elimination of 14(c).

The majority of opponents of Section 14(c) support a planned phase out of the program, because, while they believe that the program is not meeting its initial goals and obligations, they understand that elimination will have a significant economic and cultural impact for many people and organizations. As a result, there are a number of proposals that outline suggested timeframes, benchmarks, and expectations for what they determine to be a successful planned phase out. These phase-out programs are designed to ensure that people remain employed and to collect data to measure the outcomes of the change. Proponents of these proposals expect that competitive integrated employment will be the outcome of these changes. The proposals are supported by a number of national disability organizations, membership associations and other nonprofits. Many of these organizations represent both members that utilize the Section 14(c) exemption and members that do not.

The final option, which is to continue to implement Section 14(c) with improved oversight and enforcement, is usually presented by organizations who heavily utilize the certificate. These organizations tend to argue that elimination of the program will reduce employment outcomes for people with the most significant disabilities. Proponents for this action are usually connected to the operations of current sheltered workshops that employ a number of people who they do not believe will be able to transition into competitive integrated employment.

It is also worth noting that there are individuals and family members in the community who are concerned that eliminating Section 14(c) will negatively impact the people it was intended to help. Some are concerned that closing sheltered workshops will not result in competitive employment, leaving them with less options for out-of-the-house activities. Others fear that raising wages for people with differing abilities will put certain federal benefits at risk. While we understand the concern expressed in these conversations, we do not anticipate that risk for people presently employed by Melwood, where on average we pay close to \$12 per hour and offer a full benefits package to workers with differing abilities.

CASE STUDY – MELWOOD’S ELIMINATION OF SUB-MINIMUM WAGES

About Melwood’s Past Use of Section 14(c)

Melwood possessed a Special Minimum Wage Certificate from 1971 through 2016, applying the provisions of Section 14(c) to most, but not all, of its workers with disabilities performing Direct Labor.

In July 2013, Melwood eliminated its use of Section 14(c) for all programs except for its federal contracts through AbilityOne. It continued to use Section 14(c) for its AbilityOne Contracts, allowing an employee to be paid less than the WDR for the job, but not less than the normal statutory minimum wage. For example, if an individual is employed as a custodian on an AbilityOne Contract in DC (WDR=\$11.83/hour) and scores 50% productivity in a Time Study, Melwood would pay the employee \$10.50/hour (DC’s normal statutory minimum wage) and not \$5.92/hour, the rate produced by the employee’s Time Study. If the employee scores 90% productivity in a Time Study, Melwood would pay the employee \$10.64/hour (90% of the WDR) because the rate produced by the Time Study is higher than DC’s minimum wage.³

³ Please note that DC was chosen for this example because on February 12, 2014, President Obama signed Executive Order 13658, establishing a Minimum Wage for Federal Contractors. The Executive Order raises the hourly minimum wage paid by contractors to workers performing on or in connection with covered federal contracts to: (i) \$10.10 per hour, beginning January 1, 2015; and (ii) beginning January 1, 2016, and annually thereafter, an amount determined by the Secretary of Labor in accordance with the Order. The Executive Order specifically applies to workers with disabilities, regardless of the employer’s possession of a Special Minimum Wage Certificate. At the moment, the minimum wage set by Executive Order 13658 exceeds all minimum wage rates in Maryland. That is expected to change later in 2016.

⁴ Gen. Accounting Off., Special Minimum Wage Program: Centers Offer Employment and Support Services to Workers with Disabilities, But Labor Should Improve Oversight 9 (2001).

Implications of Melwood's Past Use of Section 14(c)

Financial Savings That Diminished Over Time

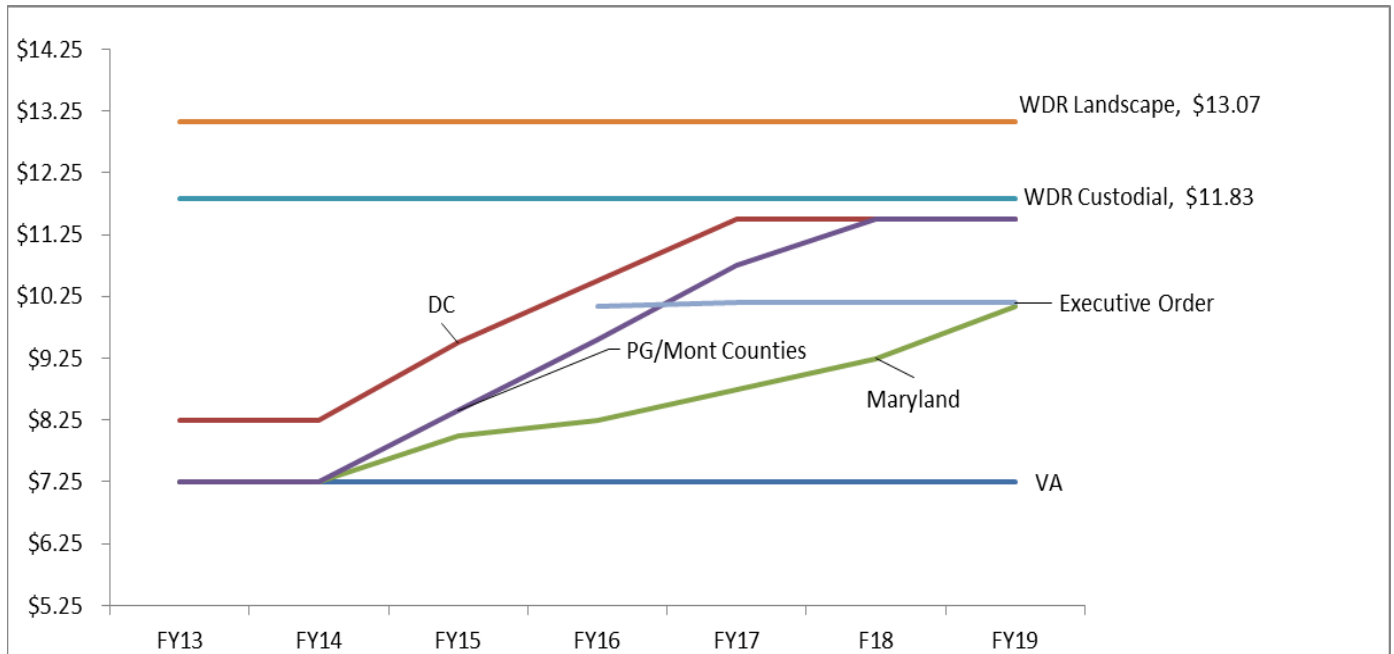
As a result of applying Section 14(c), Melwood realized approximately \$525,000 in gross labor savings over a 12-month operating year for its AbilityOne contracts⁴. These labor savings were the result of reduced wage rates and related reductions in employer-paid taxes. The labor savings occurred at over 25 individual sites with cost avoidance ranging from \$727 to \$181,000.

These gross savings were reduced by Melwood's 2013 decision not to reduce wage rates below the normal statutory minimum wage. Subsequent to Melwood's 2013 decision, a number of local governments chose to start increasing the minimum wage. As they did, the difference between the normal statutory minimum wage and the WDR for custodial positions diminished. Additionally, Executive Order 13658 required that no employee on a federal contract, including severely disabled employees working on AbilityOne Contracts, be paid less than \$10.10 per hour.

The net effect of Executive Order 13658 and Melwood's 2013 policy decision was that the 14(c) program no longer produced as significant a labor savings as they had in previous years.

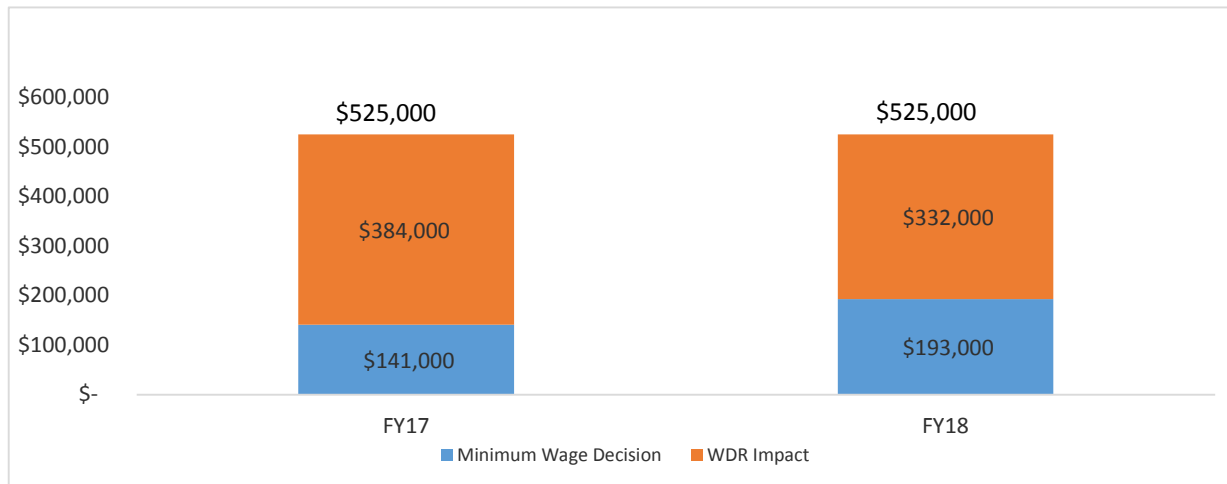
Figure 2. Minimum Wage Rates Encroach on WDR Rates Over Time

⁴ This calculation assumes current productivity rates and no increases in the current WDR rates. It accounts for Melwood's decision to not pay less than the normal statutory minimum wage. It reflects gross savings, and does not account for the cost of administering the program.



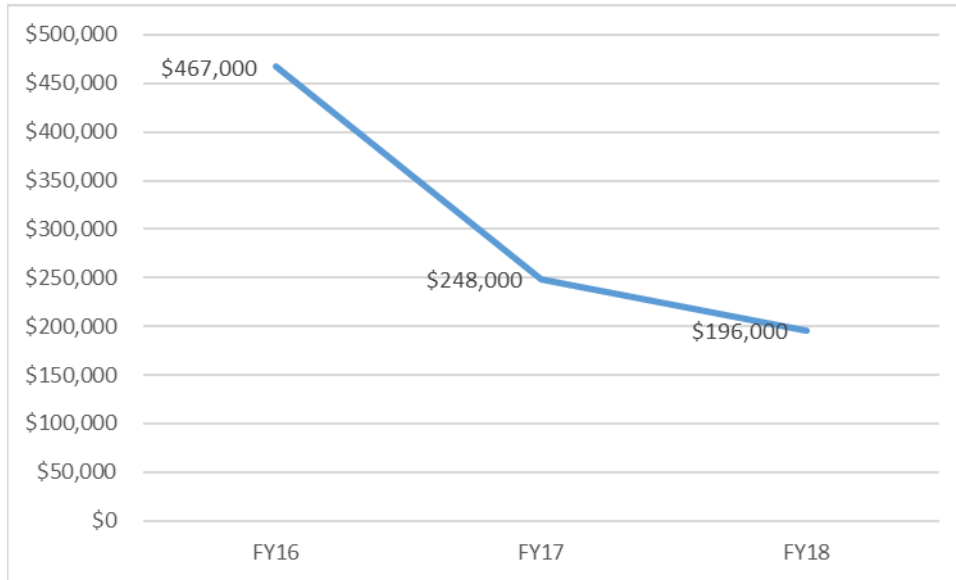
As illustrated in Figure 3, Melwood's 2013 decision reduced potential labor savings to \$384,000 in FY17 and to \$332,000 in FY18. It is worth noting that a reversal of Melwood's 2013 decision would not have restored 100% of those savings, as Executive Order 13658 set a minimum wage on all federal contracts regardless of an employer's 14(c) certificate.

Figure 3. 2013 Minimum Wage Decision Erodes Potential Labor Savings



Potential labor savings were further reduced by the cost to administer the program, which approximated \$136,000.

Figure 4. Net Savings Were Trending Downward



All of the calculations above assumed no reduction in the labor force and represent pure bottom line impact.

Productivity was Negatively Impacted

The administration of Time Studies pulled employees from productive work, at least twice annually. We estimated that the average employee lost five hours of productive time as a result of Time Studies. This estimation does not include any loss of productivity due to distraction because of anxiety related to the Time Study. This loss in productivity was of such concern that some customers of Melwood services banned the use of Time Studies at their sites.

Melwood's Reputation Was at Risk

A number of persons served have filed complaints against Melwood with the EEOC alleging that the use of Section 14(c) discriminated against them on the basis of their disability status. While Melwood's actions were legal and while Melwood ultimately prevailed in these matters, the public complaint itself tarnished Melwood's brand because Melwood is an advocate of equal treatment and full inclusion.

Our former use of Section 14(c) prevented Melwood from being seen as a leader in best practices for inclusive employment. The National Federation for the Blind and other

non-profit organizations already advocated against the practice of paying sub-minimum wages⁵.

Morale Was Negatively Impacted

Time Studies were a source of great distress and anxiety for employees because our employees understood that Time Studies had very real implications if there was even the slightest decline in performance. These implications were even more burdensome for our employees because they were employed in what are already low-paying fields (e.g. custodial).

⁵ Their argument against subminimum wage also includes paying below the WDR. Under the Service Contract Act and Davis-Bacon Act, the WDR is the minimum wage. These organizations do not recognize a difference between paying below the WDR and paying below the normal statutory minimum wage.

Full Elimination of 14(c)

On February 3, 2016, Melwood's Board of Directors voted to cease application of Section 14(c) effective February 14, 2016.

On that date, a status change will be executed bringing 396 employees to the appropriate WDR for their respective jobs. Employees will see the result of this change on their pay checks dated March 10, 2016. (Employees on weekly pay, because of the Davis-Bacon Act, will see the increase on their March 3, 2016 paycheck.)

FISCAL and OPERATIONAL IMPACT

It is estimated that Melwood will realize \$248,000 in net increased contract labor costs in FY 2017 by fully eliminating the use of Section 14(c). There will be no reduction in employment of people with disabilities.

We anticipate that we can minimize the impact of discontinuing the use of Section 14(c) by leveraging better technology and new strategies in training and work distribution. Examples of recent efforts in this regard include the transition to "Team Cleaning" and the use of backpack vacuums.



Melwood 14(c) Waiver Elimination Questions & Answers

Question #1	Why is Melwood doing this now? Why did it take so long for Melwood to get to this decision?
Answer	In 2013, Melwood set itself on a path of phasing out its use of 14(c). We recognized that 14(c) stood counter to our vision, but we also recognized that eliminating it would have a significant financial impact that could jeopardize Melwood's ability to operate and provide critical services to people with differing abilities. Since then, we analyzed the costs, implemented organizational efficiencies, and readied ourselves for the change. Now, it is time to end that journey by fully eliminating Melwood's use of Section 14(c).
Question #2	How will this impact Melwood's employees?
Answer	Melwood employees will no longer be subjected to time studies to determine their productivity level, which then affects their pay. Every Melwood worker will earn the full WDR rate for their job, plus they are entitled to employee benefits in accordance with Melwood benefit plans.
Question #3	How many employees will be impacted?
Answer	396 employees will see an increase in hourly wages based on elimination of Time Studies and use of the FLSA 14(c) Special Wage Certificate.
Question #4	What is the lowest wage you currently pay under the 14(c) special wage certificate? How much more money will individual workers make actually per hour?
Answer	Melwood's use of Section 14(c) was limited to its federal contracts under the AbilityOne program. President Obama's Executive Order 13658, issued in 2014, prohibited an employee on a federal contract from being paid less than \$10.10 per hour, regardless of an employer's 14(c) certificate. An employee working as a custodian will now be paid \$11.83 per hour. An employee working in grounds maintenance will be paid \$13.07 per hour, regardless of his/her productivity level.
Question #5	What will it cost Melwood to make this change?

Answer	It is estimated that Melwood will realize \$248,000 in net increased contract labor costs in FY 2017 by eliminating the use of Section 14(c).
Question #6	Does this mean that Melwood has been exploiting its workers in the past?
Answer	<p>No. The world has changed and social attitudes and perceptions have evolved. Melwood was founded on a vision of a world where people with differing abilities are fully included. In 1963, that meant breaking down barriers and misconceptions in order to just get people with differing abilities an opportunity to work in their community. Our first victories were just getting in the door, arranging an interview, and landing a job – any job. At the time, we were swimming against a current.</p> <p>But now, we have been proving for over fifty years that, if given the chance, people with differing abilities are perfect for the job. The challenge is no longer getting an opportunity, it is ensuring that people with differing abilities are set up to succeed and are not subjected to disparate treatment in the workplace.</p> <p>Any savings as the result of reduced labor costs were invested in Vocational Support Services to help individuals with differing abilities succeed in our workforce.</p>
Question #7	Will Melwood continue to offer Vocational Support Services?
Answer	<p>Yes. Melwood's philosophy is that every person with a differing ability is capable of working competitively in the community when a suitable position and work environment is available to him/her. Rather than trying to sculpt individuals into "perfect workers" through extensive prevocational assessments and training, individuals in the program are offered help finding and keeping jobs that capitalize on their personal strengths and motivation. Our primary goal is not to change the individual, but to find a natural "fit" between the individuals' strengths and experiences with a job in the community.</p>
Question #8	Will employees working at lower productivity and receiving higher wages have any negative impact on the morale of Melwood's typically-abled workforce or clients?
Answer	<p>Worker perception of co-worker productivity impacts morale at all workplaces. We believe that Melwood employees choose to work here and our customers choose to engage us, because they believe in our vision and mission. They understand that some people may take longer to get up to speed, but that with the right support everyone can be productive. This is the culture of inclusion that is part of who we are.</p>

Question #9	What level of pay increases will affected employees see, and when?
Answer	We will be ceasing application of Section 14(c) effective February 14, 2016. On that date, a status change will be executed bringing all employees to the appropriate WDR for their respective jobs. Employees will see the result of this change on their paychecks dated March 10, 2016. (Employees on weekly pay, because of the Davis-Bacon Act, will see the increase on their March 3, 2016 paycheck.) Hourly rates will increase by anywhere from \$1.68 to nearly \$3.00.
Question #10	How does this wage increase impact their SSI/SSDI and other government benefits?
Answer	The 2014 Presidential Executive Order 13658 got us to a point where loss of Social Security is not much of a concern for full time workers. Some workers will want to manage their earnings to ensure that they do not lose Medicaid eligibility. We will arrange benefits counseling to allow all employees and families to make the decisions that best meet their needs.
Question #11	Will Melwood make restitution payments to employees previously employed under 14(c) subminimum wage circumstances?
Answer	No. The Special Wages provision of FLSA Section 14(c) is a legal instrument that many organizations continue to use today. Melwood's use of 14(c) was appropriate at the time. Remember, we started using it in a time when many believed that people with severe disabilities simply could not be productive members of the workforce. With improved adaptive techniques and evolving social understanding, we have gotten to a place where the 14(c) certificate is no longer needed and is no longer appropriate.
Question #12	Will any Melwood employees lose their jobs because of the increased cost?
Answer	No. One of the reasons we took a phased in approach was to ready ourselves for this change.
Question #13	Will these higher wages cause Melwood to be less competitive?
Answer	No. These higher wages will not affect Melwood's pricing. What it will mean is that Melwood will need to continue to look for more ways to be efficient and for more ways to help a person improve productivity. It will mean that the AbilityOne contracts will not be able to subsidize community services programming to the same extent, and it will mean that we will have to expand our fundraising efforts to cover the robust Vocational Support Services our

	workers need to be successful in the workforce.
Question #14	Can Melwood recover the cost by passing on the cost to its customers?
Answer	No.
Question #15	What will be the impact of the rising minimum wage rates in this region?
Answer	Because Melwood's use of Section 14(c) is limited to its federal contracts under the AbilityOne program, employees will have to be paid the Wage Determination Rate, which is higher than the minimum wage. Rising minimum wage rates may result in the USDOL increasing Wage Determination Rates.
Question #16	Going forward, are there any circumstances in which any of Melwood's employees with differing abilities might not be paid minimum or prevailing wages?
Answer	Melwood does pay its Summer Camp Employees under Section 13(a) of the FLSA. This section allows a non-exempt employee at a Seasonal Recreation Facility to be paid a weekly rate. It is possible, that if broken down on an hourly basis that the weekly rate is less than the hourly minimum wage. These employees, however, are also provided room and board as part of their employment.
Question #17	Are all organizations across the country that people with disabilities doing the same thing? What about competing agencies in Maryland/DC Metro? If not, why not?
Answer	No. Some organizations would like to make the change but have not been able to figure out how to sustainably do so. Some organizations still believe that 14(c) is needed to create opportunities for the most severely disabled.
Question #18	Will organizations that are not supporting elimination of the 14(c) waiver be impacted by Melwood's action?
Answer	No. This is a decision that only impacts Melwood.
Question #19	Proponents of keeping the 14(c) say that elimination of that section of the FLSA will put people with disabilities out of work. What is your response to that? Will Melwood have to lay off people with significant disabilities or avoid hiring them in the first place?
Answer	That is not the case in today's society. Melwood can make this change

	without affecting the employment of people with disabilities. It will, however, require us to improve our ability to find an appropriate job match for each person. In addition, we have decades of experience helping people with differing abilities find competitive employment in their communities. This trend toward competitive, integrated employment is growing and will create even more opportunities for workers with differing abilities.
Question #20	Proponents of eliminating the 14(c) say this provision of the FLSA is legal discrimination against a specific population group and that this is a pay-equity issue. What do you say to that?
Answer	Section 14(c) is codified disparate treatment. The law allows paying subminimum wage to people with documented differing abilities, “whose earning or productive capacity is impaired by age, physical or mental deficiency, or injury,” while making no such allowance for less-productive typically abled workers. It stands in stark contrast to the principles of Civil Rights as outlined in the Americans with Disabilities Act.
Question #21	In the bigger picture, beyond Melwood, what impact will this have on other agencies that continue to use their special wage certificate and conduct time studies?
Answer	Hopefully, our story will be a case study that will prompt other agencies to question the practice of paying subminimum wage. By learning our story, these agencies can learn the questions they need to ask and analyze potential steps they need to take in order to successfully eliminate 14(c). We are happy to help other organizations move in this direction.
Question #22	Do AbilityOne and SourceAmerica support Melwood’s decision?
Answer	AbilityOne is a regulatory agency that has no official position. SourceAmerica has members on both sides of the issue
Question #23	Is there any chance that this move will have an adverse impact on Melwood? If so, what might happen?
Answer	We believe that our thoughtful three-year phase out has minimized the chance for adverse impact. Leadership is confident that this decision is manageable and the right thing to do for the people we serve.
Question #24	Other organizations are saying that Melwood has the size and finances to do this but they do not, how do you respond?
Answer	There are two views on the subject, which depends on the type of organizations that might respond in such a manner. Advocacy organizations

	<p>will all likely endorse the move as a social, moral and economic imperative. We agree!</p> <p>Agencies employing individuals with differing abilities may not. Organizations like Melwood, employing greater or lesser numbers of such employees, will likely remain divided depending upon their individual business strategies and financial resources. Eliminating use of 14(c) will ultimately require more effort in assessing individual strengths and finding appropriate job matches for each person affected.</p>
Question #25	Will Melwood's decision to eliminate 14(c) adversely impact other agencies operating sheltered workshops and possibly put them out of business?
Answer	<p>We believe that our decision may cause disruption of the status quo for agencies and corporations operating sheltered workshops. Historically, progressive thinking and movement toward economic justice have always initiated new thinking and strategic realignment. For all of the reasons previously mentioned, we believe this is the right thing to do and the right time to do it.</p>

GLOSSARY	
FLSA Section 14(c)	<p>Section 14(c) of the Fair Labor Standards Act FLSA allows employers to pay wages below the federal minimum to employees who have disabilities¹ that directly affect their job performance. Employers are able to do this through a Special Minimum Wage Certificate obtained from the U.S. Department of Labor's (USDOL) Wage and Hour Division (WHD). The special minimum wage rate must be commensurate with those rates paid to workers without disabilities in the region for essentially the same type, quantity and quality of work.</p>
People with differing abilities	<p>In 2013, Melwood adopted a corporate philosophy that called for the organization to formally remove the prefix "dis" from the term disability. Members of our senior leadership team felt that the term, defined as a limitation in the ability to pursue an occupation because of a physical or mental impairment; a disqualification, restriction or disadvantage and a lack of legal qualification to do something, was an inadequate or limiting "label" for a cross section of people. After much consideration we now refer to all of the people we serve as persons with "differing abilities," which is a much more accurate portrayal of their capabilities.</p> <p>We recognize the specific needs that a person diagnosed with a physical, developmental, neurological, mental health and any other impairment may require. Our organization was established to meet those needs and our decision to change the terminology we use will in no way change the care we give to people with differing abilities.</p> <p>Our decision to use the term "differing abilities" was a natural evolution of the principles we were founded on: a vision of inclusion for ALL people. In support of our mission and core values we will continue to cultivate the skills the people we serve have attained and empower them to pursue their career and personal goals, recognizing that we all have extraordinary abilities.</p>
Time Study	<p>A Time Study is a direct and continuous observation of a task, using a timekeeping device (e.g., decimal minute stopwatch, computer-assisted electronic stopwatch, and</p>

	videotape camera) to record the time taken to accomplish a task and it is often used when there are repetitive work cycles of short to long duration.
Vocational Support Services	Vocational Support Services are services designed to teach and reinforce concepts related to work, including responsibility, attendance, task completion, problem solving, social interaction, motor skill development, and safety
WDR	<p>A "wage determination" is the listing of wage rates and fringe benefit rates for each classification of laborers and mechanics which the Administrator of the Wage and Hour Division of the U.S. Department of Labor has determined to be prevailing in a given area for a particular type of construction (e.g., building, heavy, highway, or residential).</p> <p>The Wage and Hour Division issues two types of wage determinations: general determinations, also known as area determinations, and project determinations. The term "wage determination" is defined as including not only the original decision but any subsequent decisions modifying, superseding, correcting, or otherwise changing the rates and scope of the original decision.</p>