



Living Independently for Today & Tomorrow
1241 Crawford Drive, Billings, MT 59102 · (406) 259-5181
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<http://www.lifft.org>

January 16, 2025

To the U.S. Department of Labor, Wage and Hour Division:

Subject: Ending Subminimum Wages: Upholding Dignity and Equity

Living Independently for Today & Tomorrow (LIFTT) strongly supports the Department of Labor's proposed action to eliminate the use of 14(c) certificates. The payment of subminimum wages to individuals with disabilities is an outdated and discriminatory practice that must end. Here are ten reasons why subminimum wages should be prohibited:

- 1. Violation of Human Rights:** Paying individuals with disabilities less than minimum wage undermines their fundamental human rights to fair and equal treatment.
- 2. Erosion of Dignity:** Subminimum wages devalue the skills, contributions, and inherent dignity of people with disabilities, reducing them to second-class status in the workforce.
- 3. Equal Opportunity and Access:** Subminimum wages directly conflict with the principles of equal opportunity and access enshrined in the Americans with Disabilities Act (ADA).
- 4. Outdated and Discriminatory:** The 14(c) program is rooted in an antiquated view of disability and fails to reflect modern values of inclusion and equity.
- 5. Perpetuation of Poverty:** Subminimum wages trap individuals with disabilities in cycles of poverty, preventing them from achieving financial independence and security.
- 6. Barriers to Inclusive Employment:** Allowing subminimum wages discourages employers from adopting inclusive hiring practices and providing accommodations to workers with disabilities.
- 7. Lack of Incentive for Skill Development:** Subminimum wages disincentivize investment in training and skill-building programs that could empower individuals with disabilities to achieve competitive employment.
- 8. Undermines Labor Protections:** Subminimum wages weaken the broader framework of labor laws designed to ensure fairness and equity for all workers.



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9. Negative Social Impacts: The practice reinforces stereotypes and stigma surrounding disability, perpetuating social exclusion rather than fostering inclusion.

10. Proven Alternatives Exist: Numerous states and organizations have successfully transitioned away from subminimum wages through supported employment programs, demonstrating that individuals with disabilities can thrive in competitive, integrated workplaces.

At LIFTT, we believe that inclusion means valuing every person equally, and fair wages are a cornerstone of dignity and independence. We encourage everyone to join us in supporting the Department of Labor's effort to prohibit subminimum wages by submitting a public comment before January 17, 2025.

Together, we can build a future where real work earns real wages for everyone.

Sincerely,

Carlos A. Ramalho, Executive Director
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LIFTT is a Montana 501(c)3 corporation organized as a Center for Independent Living (CIL) with offices in Billings and Glendive. LIFTT provides services to people with disabilities in 18 counties in South and Central Eastern Montana: Big Horn, Carbon, Carter, Custer, Dawson, Fallon, Garfield, Golden Valley, McCone, Musselshell, Powder River, Prairie, Richland, Rosebud, Stillwater, Treasure, Wibaux, and Yellowstone.

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