

Something EPIC is Happening in Virginia: Increasing Competitive Integrated Employment Outcomes for People with Disabilities

Northwestern University
Michelle Yin
Regina Seo
Hoa Vu

Third Sight
Dahlia Shaewitz
Jessica Nadzam
Julia Ford

Overview

Subminimum wage employment limits career prospects for people with disabilities, exploits workers by offering extremely low wages, and constrains their opportunities for community participation and independence. The continued use of subminimum wage labor sits within the broader societal context of disability discrimination in the United States. Although there has been a national shift away from subminimum wage employment, most states still maintain policies that perpetuate this practice. In 2022, fourteen states were awarded federal grants to design and implement models to transition people with disabilities into competitive integrated employment (CIE). The Virginia Department for Aging and Rehabilitative Services (DARS) has designed a model to address systemic and individual barriers to achieving CIE. Northwestern University is leading the evaluation and dissemination of findings that result from this model demonstration project, potentially offering alternative methods to eliminate subminimum wage where federal and state policies fall short.



Introduction

People *with* disabilities lag behind their peers *without* disabilities in key education and economic indicators. They are less likely to complete high school and college, less likely to be employed, and when employed they earn less wages in similar positions (Thomas et al., 2024). This contributes to a disproportionately higher rate of poverty among people with disabilities — over two and a half times that of those without disabilities (Thomas et al., 2024). A possible contributing factor to this disparity is the continued use of subminimum wage employment, enabled by federal and state law, which is situated within a broader societal context of disability discrimination in the United States.

Disclaimer: The contents of this Policy Brief were developed under Grant Number H421D220008 from the Department of Education. However, those contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government (Authority: 20 U.S.C. §§ 1221e-3 and 3474). The views expressed in this policy brief are those of the researchers and do not reflect the views of the institutions.

The challenges are systemic. The systemic challenges are deeply rooted. The educational system often sets low expectations and often fails to foster social inclusion among students with and without disabilities. Limited academics and work experiences, in turn, lead to restricted career options for young people and adults with disabilities. Those facing the most complex barriers to work are often channeled into subminimum wage jobs and segregated work settings, or they remain unemployed. Employers who obtain 14(c) certificates that are permitted to pay subminimum wages for workers with disabilities are required to provide an estimate of the value of work performed by their employees with disabilities. However, the Government Accountability Office has repeatedly found no effective and consistent method for doing so (U.S. Government Accountability Office [GAO], 2023). In 2019, more than 1,500 employers maintained these 14(c) certificate waivers, employing 120,000 people with disabilities, with an average earning of about \$3.50 per hour (GAO, 2023). Only about 5 percent of those employees are actively transitioned into competitive integrated employment options (GAO, 2023). Despite legislative efforts, such as the Employment First policies, which prioritize community-based, integrated employment, there remains a significant disparity between these progressive policies and existing practices (U.S. Department of Labor [DOL], n.d.). The ongoing use of subminimum wage policies by employers contradicts these legislative intentions, continuing to channel workers with disabilities into segregated and underpaying jobs. This conflict highlights the complex interplay between advancing inclusive policies and the reality of entrenched discriminatory employment practices.

The challenges are individual. On the individual level, challenges extend beyond societal perceptions to the preparedness of the support systems in place. Special education teachers and transition coordinators primarily focus on academics and graduation goals, while vocational rehabilitation counselors are tasked with transitioning these youth and adults into the workforce. However, there is often a lack of adequate preparation in terms of knowledge, skills, and resources among these professionals. This deficiency can leave those with the most complex barriers to employment underprepared for competitive job searches and lacking the necessary supports to maintain employment in community settings. Consequently, many believe that competitive employment at minimum wage or higher is unattainable. Without the option of subminimum wage employment, concerns arise about finding employment, earning sufficient income, maintaining necessary benefits, and feeling safe and supported in the workplace (Sommerstein, 2015; GAO, 2023; Johnson, 2016; Max, n.d.; Selyukh, 2020; Smith, 2021).

What is Subminimum Wage Employment?

In 1938, the Fair Labor Standards Act (FLSA) was enacted to provide guidance on maximum hours, overtime, and child labor. The Act included Subsection 14(c), a provision specifically designed to allow employers to pay an employee with a disability less than minimum wage. At the time, this was considered a way to encourage businesses to hire people with disabilities—specifically military service members with disabilities—who would otherwise remain unemployed (Friedman, 2019; Kelly, 2022). In response, states adopted 14(c) certificates, which enabled employers to pay below-minimum wages to people with disabilities, often placing them in segregated settings or “sheltered workshops” separate from the general workforce. Significant amendments to the FLSA in 1966 established a wage floor at 50% of the national minimum wage for people with disabilities. This floor was removed in 1986, shifting the basis for wage determination to “individual productivity” as assessed by the holders of 14(c) certificates (Ruppel, 2020).

Although subminimum wage jobs and sheltered workshops were intended to provide training, ensure a safe working environment, and facilitate a transition to competitive integrated employment (CIE)—working at competitive wages in community settings either full or part-time—the outcomes have largely contradicted these goals. The FLSA inadvertently fostered the growth of subminimum wage employers who collectively hired hundreds of thousands of people with disabilities, paying them as little as pennies per day for their labor (GAO, 2023).

Minnesota exemplifies how this federal legislation has undermined efforts to integrate people with disabilities into the general workforce, as detailed in the section on “Unintended Policy Consequences of the FLSA in Minnesota.” Research spanning decades since the 1960s consistently shows that subminimum wage employment does not benefit employees with disabilities. Rather, it has led to their exploitation, with businesses significantly underpaying these workers and providing minimal, if any, career guidance, training, or supports for transitioning into more integrated employment settings. As a result, employees receiving subminimum wages often endure a life of financial and social dependence, exacerbating their segregation from the broader economic and social fabric (Friedman, 2019).

UNINTENDED POLICY CONSEQUENCES OF THE FLSA IN MINNESOTA

Minnesota was once recognized as a progressive leader among states for its emphasis on general workforce inclusion for people with disabilities. This included state funding of vocational centers—short-term transitional programs aimed at employment—rather than relying solely on sheltered workshops (Minnesota Disability Law Center, 2022). However, the enactment of the FLSA in 1938 marked a significant change in rehabilitation services within the state. By the 1950s, sheltered workshops began receiving federal and state funds. The trend intensified in 1965 when the state legislature passed the Long-Term Sheltered Work Act, which substantially increased funding to sheltered workshops, leading to a more than 500% increase in the number of individuals with disabilities working in them by 1980. Throughout the 1970s, disability rights activists challenged these policies, fighting against the predominance of sheltered workshops and making unsuccessful attempts to unionize within them. Despite these efforts, the 1980s saw further growth in the use of subminimum wage certificate waivers and sheltered workshops as the state responded to the deinstitutionalization of state mental health hospitals by authorizing funding for an additional 600 sheltered workshops. By 1990, reports indicated that 5,687 individuals were employed in sheltered workshops, and as of April 1, 2024, 56 employers and as many as 3,495 employees are engaged in subminimum wage work in Minnesota (DOL, 2024).

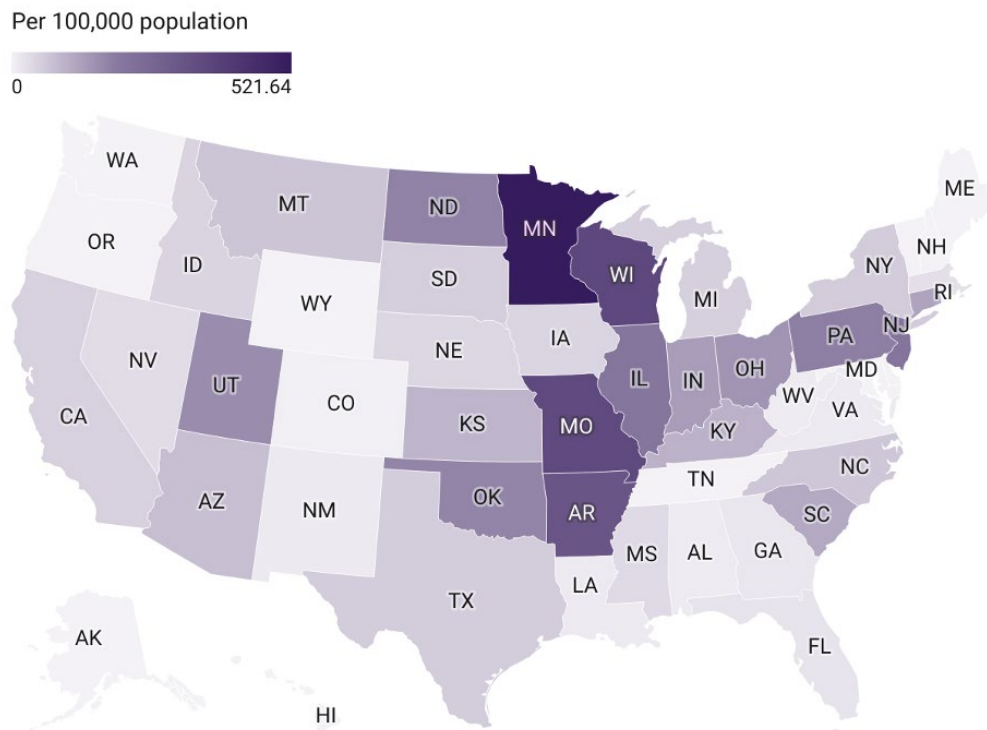
In response to ongoing advocacy from community stakeholders and self-advocates, Minnesota established a Task Force on Eliminating Subminimum Wage. This task force is set to propose a sustainable plan to phase out subminimum wage employment and facilitate the transition of individuals with disabilities into competitive, integrated employment by 2025 (Minnesota Department of Human Services, 2022; Nelson & Zuber, 2022). In addition, the Minnesota Vocational Rehabilitation Services is actively developing strategies to transition people with disabilities out of subminimum wage employment and into competitive integrated employment.

Trends in Subminimum Wage Employment and Policy

The original intent of the 14(c) certificates was to provide a gateway into employment for people with disabilities. However, research has consistently shown that these certificates often have the opposite effect—most individuals who enter subminimum wage employment settings remain in these roles, with little incentive for businesses to increase their wages (National Council on Disability [NCD], 2012). As a result, numerous disability advocacy groups and national organizations have campaigned against subminimum wages, arguing that people with disabilities have the right to direct their own lives and that society must actively work to eliminate barriers to their full participation (NCD 2012; NCD 2018; AAPD, 2023). Similarly, federal and state agencies have recognized these issues and have initiated moves to repeal Section 14(c) of the FLSA, criticizing it as both ineffective and discriminatory (NCD, 2012; NCD, 2018; U.S. Council on Civil Rights [USCCR], 2019; USCCR, 2020).

During the past decade, there has been a noticeable shift away from subminimum wage employment. In 2012 and in 2018, the National Council on Disability (NCD) urged the Administration and Congress to repeal FLSA section 14(c) (NCD 2012; NCD 2018). Furthermore, in January 2023, the GAO reported that the number of employers authorized to pay subminimum wages had been reduced by half during the decade from 2010 to 2019, with a corresponding 40 percent decrease in the number of individuals in those settings (GAO, 2023). (GAO, 2023). Despite these changes, most states still have policies that authorize the use of 14(c) certificates, as shown in Figure 1.

FIGURE 1. PEOPLE WITH DISABILITIES IN THE U.S. IN SUBMINIMUM WAGE EMPLOYMENT AS OF APRIL 2024



Note: Map depicts number of PWD reported by 14(c) certificate holding employers working for subminimum wages per 100,000 working-age disabled state population.

Source: Wage and Hour Division, Department of Labor • Created with Datawrapper



The legislative landscape of subminimum wage has evolved since Vermont first eliminated this practice in 2002. To date, a total of 11 states have fully eliminated 14(c) certificates, while another six are in the process of phasing out subminimum wage (see Appendix: State-by-State 14(c) Certificate Policy Status as of April 2024). At this writing, several states have pending legislation to either partially or fully eliminate the use of 14(c) certificates, including: Georgia, Illinois, Kentucky, Massachusetts, New Jersey, New York, North Carolina, and Ohio. Notably, while Wyoming has no active 14(c)

certificates, it has not enacted legislation directly addressing subminimum wage employment. Alaska and Oregon have passed legislation to eliminate 14(c) certificates but then created exemptions that allow subminimum wages under certain conditions. While policy change is a primary driver to eliminate 14(c) certificates, there have been notable exceptions where states have managed to eliminate subminimum wages through administrative and policy adjustments rather than through legislative reforms. Vermont in 2002 and Massachusetts more recently have shown that it is possible to eliminate subminimum wage practices without changing state legislation, demonstrating alternative approaches to reforming employment practices for people with disabilities.

Challenges persist for those earning subminimum wages, as many individuals and their families still view subminimum wage jobs and sheltered workshops as their only viable employment option (Dague, 2012; NCD 2012; Johnson, 2014; Sommerstein, 2015; Smith, 2021). These concerns are underscored by persistent barriers such as the lack of affordable, accessible transportation and housing; the high costs for personal care supports and medical devices, and the challenges to obtaining accessible healthcare services; and the lack of affordable assistive technology. Additionally, federal benefits policies that penalize people with disabilities who earn above a certain amount each month further complicate the transition to competitive, integrated employment (NCD 2018; Smith 2021). Research in states like Maine and Oklahoma has found that people with disabilities who transitioned away from sheltered workshops are less likely to find work and tend to work fewer hours (Curcio, 2018; Phoenix and Bysse, 2015; Spreat, 2017).

Successfully transitioning people with disabilities from subminimum wage employment to competitive and integrated employment requires thoughtful planning and evidence-based strategies that address systemic and individual barriers. This approach is essential for providing a clear career path for people with disabilities and ensuring their integration into the workforce.

Getting to Competitive Integrated Employment

CIE offers significant benefits for people with disabilities including higher wages, greater financial independence, greater social integration and community participation, and less reliance on public benefits. Studies have shown the macroeconomic benefits of achieving CIE through customized and supported employment options outweigh the costs of providing these services (Taylor et al., 2021; Administration for Community Living, n.d.). However, there remains a need for more research on which practices best support individuals transitioning from subminimum wage employment to successfully achieve competitive integrated employment.

The 2014 Workforce Innovation and Opportunity Act (WIOA) made CIE a priority for employment of people with disabilities. In response, a federal advisory committee report in 2016 ([Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities](#)) recommended several policy and practice changes to support CIE, including:

- Building the capacity of service providers to support people with disabilities to achieve CIE;
- Supporting youth and adults with disabilities through training, early work experiences, family engagement, use of assistive technology, and systems integration;
- Conducting well-planned phase out of 14(c) certificates;
- Shifting the message for employers to view people with disabilities as valuable employees while incentivizing employment and accommodations for these workers;
- Addressing common barriers to employment for those in or at risk of entering subminimum wage;
- Reviewing federal policies that may serve as barriers to entering CIE, reducing the complexity of federal benefits, and removing “punitive” policies that prevent the gradual transition into competitive wage employment; and
- Amending policies to reform the AbilityOne¹ program to achieve CIE outcomes.

¹The Wagner O’Day Act signed into law in 1938 established the [AbilityOne Commission](#), an independent federal agency that contracts with nonprofit agencies across the country to employ people with disabilities through contracts to provide goods and services to the federal government.

In 2022, the Rehabilitation Services Administration (RSA), U.S. Department of Education, awarded funds to 14 state vocational rehabilitation (VR) agencies to create and evaluate innovative programs to transition people with disabilities into CIE. The Subminimum Wage Transition to Competitive Integrated Employment (SWTCIE) grantees are states that had policies allowing for 14(c) certificates at the time of award and required plans to:

- Identify strategies for addressing challenges associated with access to CIE (e.g., transportation, support services);
- Provide integrated services that support CIE;
- Support integration into the community through CIE;
- Identify and coordinate wraparound services for any individual served by the project who obtains CIE;
- Develop evidence-based practices and share those practices with other entities holding 14(c) certificates, State VR agencies, local rehabilitation providers, State and local workforce agencies and regional and local employers; and
- Provide entities holding section 14(c) certificates with readily accessible transformative business models for adoption.

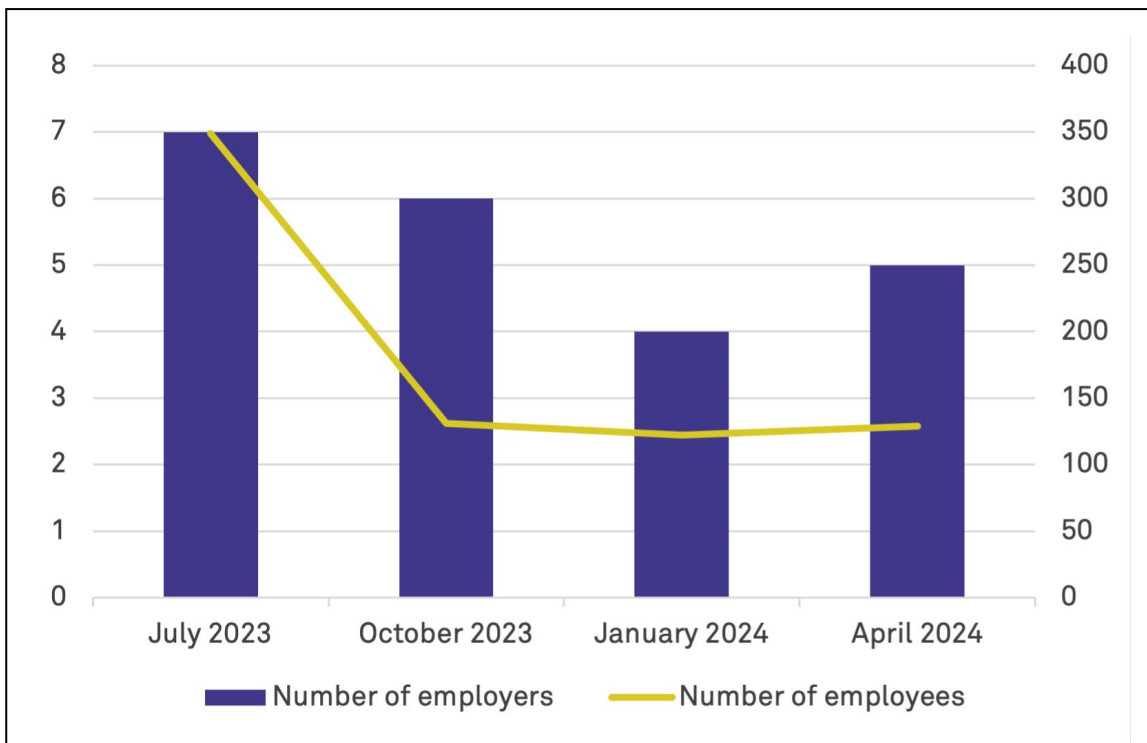
Something EPIC is Happening in Virginia

In 2012, Virginia joined a national movement by adopting Employment First policy through Senate Joint Resolution 127, positioning employment in the general workforce as the “first and preferred option” for all workers with disabilities who are part of the public service system (Virginia Legislative Assembly, 2012). This policy emphasizes the integration of these individuals into competitive employment settings, aligning with broader national trends toward inclusivity.

Building on this foundation, the Virginia legislature took a significant step forward with the introduction of House Bill 1924. This bill proposed eliminating subminimum wage certificates and outlined a plan to incrementally increase the minimum wage for individuals with disabilities. The plan set out a timeline extending through 2027, culminating in wage parity with the regular state minimum wage by that year. The Virginia governor amended the bill to extend the phase-out of subminimum wage certificates until 2030. By the end of this period, all employee wages must align with the state minimum wage, with no new 14(c) certificates to be issued after that date (Nadeau, 2023).

As of April 2024, Virginia reports having five active employers with 14(c) certificates, collectively employing 129 individuals earning subminimum wages (U.S. Department of Labor, 2024). These numbers continue to change rapidly as several employers have begun opting not to renew their waivers in anticipation of the 2030 deadline. This transition is illustrated in Figure 2, which documents the decline in both the number of employers with a 14(c) certificate and the number of employees of those firms since the legislation passed in July 2023.

FIGURE 2. DECLINE IN SUBMINIMUM WAGE EMPLOYMENT IN VIRGINIA SINCE JULY 2023



Prior to this policy change, the Virginia Department for Aging and Rehabilitative Services (DARS) was awarded a five-year, \$13.8 million Subminimum Wage Transition to Competitive Integrated Employment (SWTCIE) grant in 2022. The grant aims to design and implement a model to support the transition of individuals with disabilities currently in subminimum wage employment into competitive, integrated employment. In addition, it seeks to “shut the front door” for youth with complex disabilities who are at-risk of entering subminimum wage or sheltered employment (Hirneisen, 2023; Nadeau, 2023).

The primary goal of this project is for Virginia DARS to develop sustainable services and supports to allow individuals with disabilities to engage in employment within the general workforce. This employment should match their knowledge, skills, and abilities, and provide compensation at customary wages for the positions. The initiative focuses on building capacity at the local level to improve and expand services that will address the various obstacles to employment faced by individuals with disabilities. By enhancing local capacity among partners and stakeholders, DARS aims to facilitate effective transition strategies that not only move participants away from subminimum wage employment but also prevent their initial entry into such employment settings, ultimately leading to successful competitive integrated employment outcomes.

Virginia’s Real Pay for Real Jobs (RPRJ) Education and Outreach, Partnership Development, Provisions of Individualized Services, and Capacity Building (EPIC) project is designed to continue the progression toward CIE. DARS is piloting the EPIC model in two regions of the state and will include the following elements:

- **Education.** Adults and students with disabilities receive skills building support to prepare them for CIE. Students and their families engage in peer and family mentoring.
- **Partnership Development.** Vocational rehabilitation counselors (VRCs) engage broad community partners to support the needs and interests of participants. Virginia’s No Wrong Door expands information on local services and supports available.
- **Individualized Services.** A person-centered approach that uses the integrated resource team (IRT) strategy to address the complex barriers faced by people with disabilities seeking employment.
- **Capacity Building.** Ongoing technical assistance in supported employment and customized employment for VRCs and employment service organizations (ESOs) supports long-term sustainability of skills beyond training alone. Virginia is one of several states also testing a value-based purchasing model to incentivize ESOs to work with subminimum wage employees.

“Our goal with the EPIC project is to create a culture in Virginia that truly embodies the idea that Everyone Can Work. As a service system, we have an obligation to ensure that anyone who wants to work has the opportunity to do so with the supports and services necessary to make their dreams a reality.”

— **Donna Bonessi**, Director, Employment Services and Special Programs,
Virginia Department for Aging and Rehabilitative Services

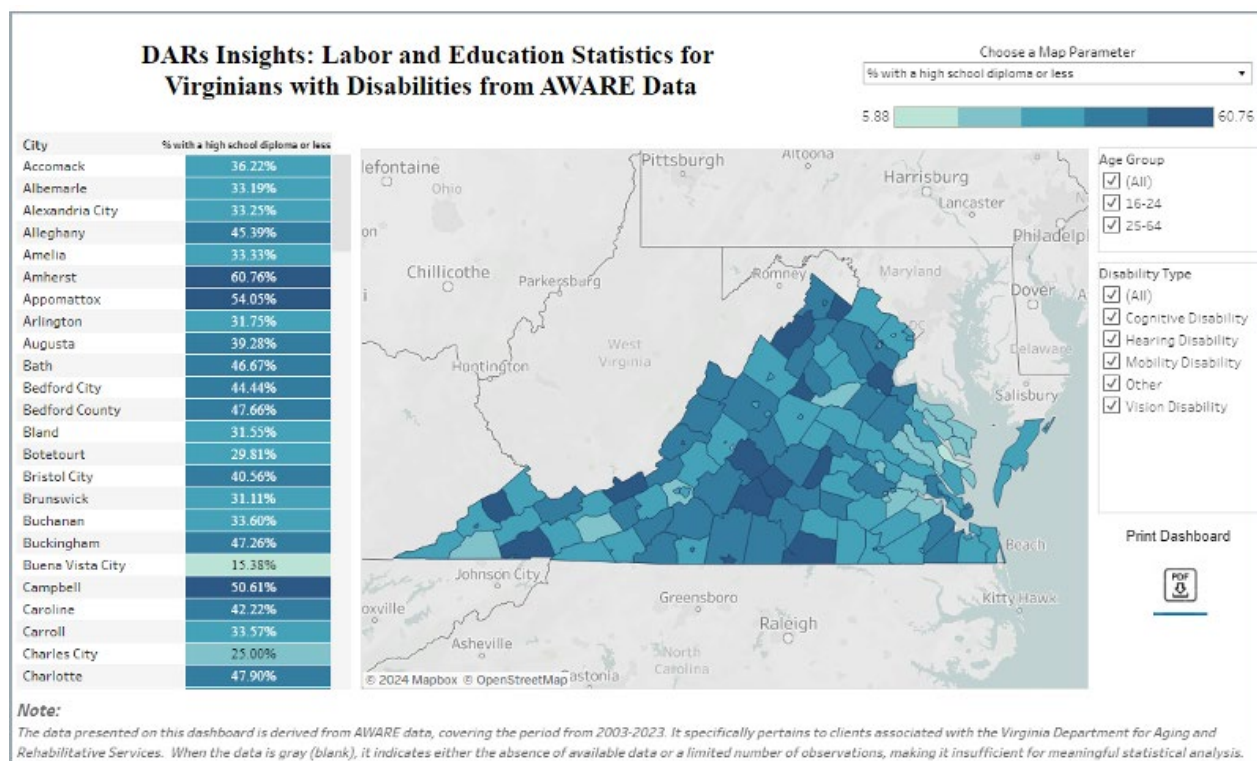
Northwestern University leads the evaluation of the Real Pay for Real Jobs (RPRJ) EPIC initiative led by Virginia DARS. To assess both the implementation and impact of the model, Northwestern’s evaluation team will employ a mixed-methods approach. This approach integrates quantitative and qualitative research techniques to provide a comprehensive analysis.

Quantitatively, the team will utilize data collection and statistical analysis to measure employment-related outcomes for participants, employing a quasi-experimental design to gauge the efficacy of the program systematically. This method allows the evaluators to compare the outcomes of participants in the program against a control group that does not receive the intervention, providing robust evidence of the program’s effectiveness. Qualitatively, the team

will conduct surveys, interviews, and observations to gather detailed insights into how the program operates on the ground. This aspect of the evaluation will explore the experiences and perceptions of participants, identifying strengths and areas for improvement in the program’s delivery. This qualitative data will help Virginia DARS understand the nuances of the model’s implementation, including any unforeseen challenges or beneficial practices that emerge during its execution.

In addition to these methods, Northwestern University has developed a sophisticated dashboard that visualizes education and employment outcomes by county for individuals with disabilities in Virginia, utilizing the state’s AWARE data. This dashboard specifically shows the percentage of people with disabilities working at, below, and above minimum wage at the time of application and at closure. This visualization tool is designed to assist VR counselors, consumers, and administrators in easily accessing and understanding these statistics. The dashboard is a dynamic tool, with the team committed to continuously updating it with new data as the project progresses, ensuring that all stakeholders have access to the latest information regarding the impact of the initiative. This dashboard can be found at: [Northwestern University RISEI - Virginia EPIC Project](#). Figure 3 in the document illustrates this innovative tool.

FIGURE 3. VIRGINIA DARS DATA DASHBOARD EXAMPLE



Evolution of the RPRJ EPIC Model

In the second year of the grant, the RPRJ EPIC model has evolved in response to changes in state policy and the shifting needs of employers, service providers, and participants with disabilities. The project now includes a detailed plan of approach, partners to implement the plan, VRCs, and service providers to support both adults and students with disabilities. An evaluation plan is in place to capture both the impact and the implementation of the grant. The project aims to measure increased CIE outcomes, enhanced capacity among VRCs and service providers, and shifts in perceptions among service providers regarding the capabilities of people with disabilities.

Conclusion

The Fair Labor Standards Act (FLSA), particularly its Section 14(c), which allows subminimum wages for certain workers with disabilities, reflects an approach that is increasingly seen as outdated. This practice has been criticized for perpetuating discrimination against an identifiable group of people. The movement toward ensuring that the right to work and receive competitive wages in community settings is recognized as a basic human right is gaining momentum.

Significant policy changes and the adoption of evidence-based strategies are essential to eliminate discrimination against workers with disabilities. Various states are leading efforts to remove subminimum wages, which not only influences local policies but also has broader implications for federal legislation like the FLSA. The SWTCIE projects in 14 states are testing innovative approaches that could provide valuable insights. These projects are expected to offer empirical evidence that can help refine VR practices and influence wider policy reforms.

In Virginia and other states, targeted initiatives aim to build capacity and deliver services that confront persistent barriers to employment for people with disabilities. These initiatives are designed to improve employment outcomes and contribute to shifting perceptions about the employability of people with disabilities.

The results from these state projects may offer new methods for effectively eliminating subminimum wages, particularly in contexts where legislative efforts alone are insufficient. This progress is complemented by ongoing advocacy efforts from various stakeholders that support the elimination of subminimum wage policies across the country.

About RISEI Lab at Northwestern University (<https://sites.northwestern.edu/risei>)

Founded in 2021 by Dr. Michelle Yin, the Research and Innovation for Social and Economic Inclusion (RISEI) Lab stands as a dedicated center of excellence with a resolute commitment to propelling the social well-being of individuals grappling with formidable social and economic challenges. Our lab takes a distinctive focus on underserved populations, extending our support to individuals with disabilities, at-risk youth, and adult learners endeavoring to enhance their literacy skills. By means of meticulous research, data-centric analysis, and synergistic partnerships, we are driven to instigate constructive transformation in the lives of those frequently relegated to the margins of society.

**About Third Sight** (<https://www.thirdsightllc.com>)

Third Sight LLC is a woman-owned small business that contributes to and creates conditions for success in work and life for people with disabilities. Our team includes specialists in disability inclusion, data analysis and statistics, training and technical assistance, and strategies to increase employment outcomes.

Contact. To learn more about the RPRJ EPIC model demonstration project in Virginia, contact John Stewart, Grant Manager, Virginia Department for Aging and Rehabilitative Services at John.Stewart@dars.virginia.gov. To learn more about the evaluation of RPRJ EPIC led by Northwestern University, contact Dr. Michelle Yin at EPIC@northwestern.edu.

Recommended citation: Shaewitz, D., Yin, M., Nadzam, J., Seo, R., Vu, H., and Ford, J. (June 2024). *Something EPIC is Happening in Virginia: Increasing Competitive Integrated Employment Outcomes for People with Disabilities*. Third Sight and Northwestern University.

APPENDIX. STATE-BY-STATE 14(C) CERTIFICATE POLICY STATUS AS OF APRIL 2024

14(c) Certificate Policy Eliminated	14(c) Certificate Policy in Process of Phase Out (phase out date)	14(c) Certificate Policy in Effect
<ol style="list-style-type: none"> 1. Alaska 2. Delaware 3. Hawaii 4. Maine 5. Maryland 6. New Hampshire 7. Oregon 8. Rhode Island 9. Tennessee 10. Vermont* 11. Washington 	<ol style="list-style-type: none"> 1. California** (2025) 2. Colorado (2025) 3. Massachusetts* (2024) 4. Nevada (2028) 5. South Carolina (2024) 6. Virginia* (2030) 	<ol style="list-style-type: none"> 1. Alabama 2. Arizona 3. Arkansas 4. Connecticut** 5. District of Columbia*** 6. Florida** 7. Georgia** 8. Idaho 9. Illinois** 10. Indiana** 11. Iowa** 12. Kansas 13. Kentucky 14. Louisiana 15. Massachusetts 16. Michigan 17. Minnesota** 18. Mississippi 19. Missouri 20. Montana 21. Nebraska 22. New Jersey 23. New Mexico 24. New York** 25. North Carolina** 26. North Dakota 27. Ohio** 28. Oklahoma 29. Pennsylvania** 30. South Dakota 31. Texas** 32. Utah 33. West Virginia 34. Wisconsin 35. Wyoming***

* State eliminated subminimum wage through non-legislative means

**Recipient of the federally funded Subminimum Wage to Competitive Integrated Employment (SWTCIE) grant

***States with no active 14(c) certificate holders and no legislation barring subminimum wage employment.

References

- Ability One. (n.d.). *AbilityOne history*. https://www.abilityone.gov/abilityone_program/history.html
- Administration for Community Living. (n.d.). *Research supporting competitive, integrated employment*. U.S. Department of Health and Human Services. <https://acl.gov/sites/default/files/Aging%20and%20Disability%20in%20America/ResearchSupportingCompIntEmployment.pdf>
- Curcio, A. C. (2018, May 13). Call for shift in law allowing sub-minimum wage for people with disabilities stirs fear in state. *Arkansas Democrat Gazette*. <https://www.arkansasonline.com/news/2018/may/13/disabled-folks-paid-little-but-call-for>
- Dague, B. (2012). Sheltered employment, sheltered lives: Family perspectives of conversion to community-based employment. *Journal of Vocational Rehabilitation*: 37(1): 1-11.
- Davidson, J. (2023, November 8). *AAPD calls on Department of Labor to end the practice of paying disabled workers subminimum wage*. [Press release]. American Association of People with Disabilities. <https://www.aapd.com/aapd-calls-on-dol-end-subminimum-wage>
- Friedman, C. (2019). Ableism, racism, and subminimum wage in the United States. *Disability Studies Quarterly*, 39(4), Article 4. <https://doi.org/10.18061/dsq.v39i4.6604>
- Hirneisen, M. (2023, March 3). Bill sent to Youngkin would phase out subminimum wage. *The Center Square*. https://www.thecentersquare.com/virginia/article_40497f04-ba03-11ed-bf00-b35b0954aff8.html
- Johnson, A. (2016, March 12). Ohioans with disabilities face changes to sheltered workshops. *The Columbus Dispatch*. <https://www.dispatch.com/story/news/2016/03/13/ohioans-with-disabilities-face-changes/23413643007>
- Kelly, K. (2022, September 20). The subminimum wage for workers with disabilities is a disgrace. *Teen Vogue*. <https://www.teenvogue.com/story/subminimum-wage-workers-disabilities>
- Max, D. A. (2023, June 15). Virginia ends the subminimum wage; Jeopardizes disabled workers. *Jefferson Policy Journal*. <https://jeffersonpolicyjournal.com/virginia-ends-the-subminimum-wage-jeopardizes-disabled-workers>
- Minnesota Department of Human Services. (2022, August 28). *Subminimum wages frequently asked questions*. <https://mn.gov/dhs/partners-and-providers/news-initiatives-reports-workgroups/long-term-services-and-supports/task-force-on-eliminating-subminimum-wages/faq.jsp>
- Minnesota Disability Law Center. (2022). *Ending the subminimum wage in Minnesota: A report from the Minnesota Disability Law Center*. https://mylegalaid.org/wp-content/uploads/2024/03/Ending-the-Subminimum-Wage-in-Minnesota_October-2022_Text-Version.pdf
- Nadeau, R. (2023, April 6). Youngkin amends bill ending subminimum wage for disabled workers. *Virginia Mercury*. <https://www.virginiamercury.com/2023/04/06/youngkin-amends-bill-ending-subminimum-wage-for-disabled-workers>
- National Council on Disability. (2012, August 23). *Subminimum wage and supported employment*. U.S. Department of Education. <https://www.ncd.gov/report/national-council-on-disability-report-on-subminimum-wage-and-supported-employment>
- National Council on Disability. (2018, October 11). *National disability employment policy. From the New Deal to the real deal: Joining the industries of the future*. U.S. Department of Education. <https://www.ncd.gov/report/national-disability-employment-policy-from-the-new-deal-to-the-real-deal-joining-the-industries-of-the-future>

- Nelson, J., & Zuber, A. (2022, July 22). *Beyond equity, towards justice—The task force on eliminating subminimum wage*. The Arc Minnesota. <https://arcminnesota.org/beyond-equity-towards-justice>
- Phoenix, J. & Bysshe, T. (2015). *Transitions: A case study of the conversion from sheltered workshops to integrated employment in Maine*. Milken Institute School of Public Health. George Washington University.
- Ruppel, E. (2020). *The depoliticization of disability: Professions and politics in the 1986 entrenchment of the subminimum wage*. Department of Sociology, University of California, Berkeley. <http://ssha2021.ssha.org/uploads/200031>
- Selyukh, A. (2020, September 17) Workers with disabilities can earn just \$3.34 an hour. Agency says law need change. *NPR*. <https://www.npr.org/2020/09/17/912840482/u-s-agency-urges-end-to-below-minimum-wage-for-workers-with-disabilities>
- Smith, P. (2021, October 12). ‘Subminimum’ pay for disabled workers moves closer to extinction. *Bloomberg Law Daily Labor Report*. <https://news.bloomberglaw.com/daily-labor-report/subminimum-pay-for-disabled-workers-moves-closer-to-extinction>
- Sommerstein, D. (2015, April 14). Advocates fight to keep sheltered workshops for workers with disabilities. *NPR*. <https://www.npr.org/2015/04/14/395287097/advocates-fight-to-keep-sheltered-workshops-for-disabled-workers>
- Spreat, S. (2017, March 23). Challenges of “Employment First.” *Social Innovations Journal*. <https://socialinnovationsjournal.org/sectors/89-government-policy/2349-challenges-of-employment-first>
- Taylor, J., Avellone, L., Cimera, R., Brooke, V., Lamber, A., & Iwanaga, K. (2021, January). Cost-benefit analyses of employment services for individuals with intellectual and developmental disabilities: A scoping review. *Journal of Vocational Rehabilitation*, vol. 54, no. 2, pp. 193-206.
- Thomas, N., Paul, S., Bach, S., & Houtenville, A. (2024). *Annual disability statistics compendium: 2024*. University of New Hampshire, Institute on Disability.
- U.S. Commission on Civil Rights. (2019). Subminimum wages: Impacts on the civil rights of people with disabilities. [Public Briefing]. Washington, DC. <https://www.usccr.gov/meetings/2019/11-15-subminimum-wages-impacts-civil-rights-people-disabilities>
- U.S. Commission on Civil Rights. (2020). *Subminimum wages on the civil rights of people with disabilities* (p. 349). <https://www.usccr.gov/files/2020/2020-09-17-Subminimum-Wages-Report.pdf>
- U.S. Department of Labor. (n.d.). *Employment first*. <https://www.dol.gov/agencies/odep/initiatives/employment-first>
- U.S. Department of Labor. (2024, April 1). *14(c) Certificate holders*. <https://www.dol.gov/agencies/whd/workers-with-disabilities/section-14c/certificate-holders>
- U.S. Government Accountability Office. (2023, January 25). *Subminimum wage program: DOL could do more to ensure timely oversight*. <https://www.gao.gov/products/gao-23-105116>
- Virginia Legislative Assembly. (2012). *Senate Joint Resolution No. 127*. 2012 Session. <https://lis.virginia.gov/cgi-bin/legp604.exe?121+ful+SJ127ER>