

Date: July 1, 2015  
To: Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities  
From: Bob Porter  
Subject: Concerns regarding WIOA NPRM and Competitive Integrated Employment

My name is Bob Porter. I'm 62 years old and I have been legally blind since I was born. I am totally blind in my left eye but I have some limited usable vision in my right eye. I've worked the competitive integrated employment issue from both sides. After graduate school, I worked for National Industries for the Blind for 6 years. And I have worked for Central Association for the Blind and Visually Impaired (CABVI) in Utica New York for over 10 years. Interspersed with this I worked in private industry/small business for over 14 years.

I chose to leave a position in private industry/small business to return to CABVI because it was an excellent career move for me. As a person with an MBA in Operations Management, I consider the job I now hold as 'the dream job of a lifetime'. I was given the opportunity to create and implement the ISO 9001–2008 Quality Management System in use at CABVI. Interpretation of the Workforce Innovation and Opportunity Act(WIOA) proposed regulations as written might consider that a move from competitive integrated employment to an agency which might not be considered competitive integrated employment even though CABVI employs a total of 247 people, only 116 who are blind and a majority 131 are sighted.

I am proud of the fact that I am able to share lunch with a variety of people here at CABVI from assembly-line workers to Managers, Vice-Presidents and even the Chief Executive Officer(CEO). The Doctor of Optometry at our Low Vision Clinic is a frequent lunch companion. Adopting the current WIOA regulations as written could limit my freedom of choice and the freedom of choice of employment of others like me.

Competitive integrated employment is considered the optimal outcome under WIOA. But in many cases, it is not realistic. The reason that specialized agencies employing workers who were disabled were originally created was that sufficient jobs did not exist elsewhere. And unfortunately, I believe that reality is still true. Statistics indicate that underemployment of job seekers who are blind or visually impaired is approximately 70%. Blind and visually impaired workers, when asked about their jobs, frequently say, "This is not my job, it's my LIFE!". We are proud and grateful for the jobs we have and we realize just how difficult it is for people who are blind or visually impaired to find any job at all.

Before dumping people out of or not allowing youth to enter specialized agencies offering what could be considered 'non-competitive, non-integrated' employment, the question must be asked, "Where will jobs in competitive integrated employment come from?" What private sector (or even public sector) employer will endorse with open arms hiring and paying competitive wages with benefits to any workers (disabled or able bodied) who cannot keep pace with the productivity of the average worker? Believing that training, no matter how comprehensive or long lasting will bring disabled workers up to speed is unrealistic. If employers hire workers with below average productivity, without monetary incentives or compensation, they cannot remain competitive in their respective markets.

Sincerely,

*Bob Porter*

Bob Porter | Quality Management Representative  
CABVI | Central Association for the Blind and Visually Impaired  
507 Kent Street Utica, NY 13501  
ph: 315.797.2233 x1303  
Fax: 315-797-2250  
[robertp@cabvi.org](mailto:robertp@cabvi.org)  
[www.cabvi.org](http://www.cabvi.org)



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