

A NEW DEAL FOR YOUTH

The Honorable Julie A. Su
Acting Secretary of Labor
US Department of Labor
200 Constitution Ave. NW
Washington, DC 20210

Dear Secretary Su,

On behalf of New Deal for Youth, we are writing to thank the U.S. Department of Labor (DOL) for listening directly to youth with lived experience in their proposed rulemaking on ceasing to issue 14(c) certificates, and ask that they continue to listen by immediately ending section 14(c) authority after the effective date of a final rule.

A New Deal for Youth (ND4Y) is a youth-led, youth-centered effort advocating for the creation of new systems, policies, investments, and structures that reimagine life for young people in America. New Deal for Youth Changemakers are a cohort of young leaders between the ages of 15 and 30 from across the country. We are advocates and organizers who work across a range of issues facing our communities, including disability and economic justice.

One of New Deal for Youth's demands is ending the subminimum wage. Therefore, we write today to support the cessation of issuing new 14(c) certificates, and to oppose allowing existing section 14(c) certificate holders to continue to operate under section 14(c) authority after the effective date of a final rule. We also write to oppose any extension periods for existing 14(c) certificate holders.

Labor is labor, and regardless of a person's disability, everyone deserves equal and just pay rates, especially with inflation being very common and poverty rates increasing with inflation. Though the cost of living for people with disabilities is often higher than for people without disabilities, people with disabilities are over-represented in low-wage and part-time jobs and earn median wages of 66 cents for every dollar people without disabilities make. The continuation of 14c exacerbates this wage gap between able-bodied people and disabled people. As disabled people face even more injustice than able-bodied people, and [disabled adults face a poverty rate more than twice as high as that of able-bodied people](#), it is especially important to cease issuing 14c certificates.

Moreover, the rationale for 14(c) certificates is dehumanizing. It suggests that though workers with disabilities and workers without disabilities do the same work, workers with disabilities should be paid less because their work is worth less. This devaluation of the work of disabled people has consequences for both livelihoods and [stigmatizing disability](#) more generally.

Finally, 14(c) has already been prohibited or limited by numerous states, localities, and in some circumstances, by the federal government itself. At least 16 states have ended the subminimum wage, and some cities have as well. The Workforce Innovation and Opportunity Act intentionally restricts the payment of subminimum wages to youth and adults with disabilities. There is already precedent for eliminating subminimum wages. We oppose extension periods because action must be taken immediately before the situation for people with disabilities becomes ten times worse. The Department of Labor should cease issuing 14(c) certificates and end section 14(c) authority immediately - people with disabilities cannot wait three years or longer for the end of this exploitative practice.

Thank you for this opportunity to comment on this invaluable solution to wage discrimination against people with disabilities. If you have any further questions, please reach out to newdealoryouth@typcollaborative.org.