

January 8, 2025

President-Elect Donald Trump
Vice President-Elect JD Vance

c/o Co-Chairs
Mrs. Linda McMahon
Mr. Howard Lutnick
Presidential Transition Team

Dear President-Elect Trump and Vice-President Elect Vance,

On behalf of the Voice of Reason (VOR), we look forward to the opportunity to work with and serve as a resource for the Trump-Vance Administration. VOR is a national non-profit organization that was founded in 1983. We advocate for high quality care and human rights for all people with intellectual and developmental disabilities (I/DD) and autism.

Primarily we represent individuals with the most severe degrees of these disabilities, and their families and guardians. Many of these individuals require 24-hour-around-the-clock support to meet their considerable physical and medical needs. Thus, VOR works to support a full range of quality residential options and services, including own home, family home, community-based service options and Medicaid-licensed intermediate care facilities for individuals with intellectual disabilities (ICFs or ICFs/IID). We have three top priorities:

Address the Direct Support Professional (DSP) Crisis

While the nation as a whole is in the midst of a shortage of qualified health care workers, the disability community faces a crisis. Any gap in care means a gap in medical needs being met, increased hospitalizations, and poorer quality of health overall. Many of these individuals do not have the option to live independently or be left alone for any length of time, so DSPs are absolutely a requirement – not a benefit. VOR urges support for increasing funding for salaries, benefits, and training for all DSPs to address this critical and timely healthcare need. These appropriations are not simply additional federal funds. The monies serve as an economic investment.

We appreciate your interest in utilizing our tax structure to recognize the commitment of family caregivers, and we are supportive of policies that work to alleviate or minimize financial strain on caregivers. The needs of the I/DD community do not occur outside of our broader economic system, and your administration's work in this space can improve both the care and healthcare outcomes for these individuals and simultaneously have positive economic ramifications. As you move forward on this front, please recognize that many caregivers are unable to work outside of their unpaid work as a family caregiver, and thus do not have incomes that would qualify them for many, if any, tax benefits.

Support 14(c) Certificate Programs as well as Competitive Integrated Employment

VOR supports preserving the 14(c) employment certificate to ensure people with severe disabilities continue to have the work opportunities currently available to them. Section 14(c) of the Fair Labor

Standards Act authorizes the issuance of specialized wage certificates that permit employers to pay individuals with I/DD a commensurate wage, often lower than the federal minimum wage, because their productivity level is too low or inconsistent, and their intellectual or behavioral challenges too great, for employers to be able to accommodate them in mainstream jobs under competitive integrated employment programs.

14(c) work usually takes place at facility-based work centers that provide a specialized environment adapted to individuals with I/DD who desire to work, but may have frequent seizures, act out physically when stressed, or need help with toileting or having their adult diapers changed. At the centers, workers can participate in a range of tasks, from sorting and boxing items to small-piece assembly work, to projects that require better-developed skills. The programs are voluntary. In short, these are good programs for a specific cohort of individuals who would otherwise slip between cracks in the system. Without 14(c) certificates, these individuals would lose any opportunity to work.

Beyond the benefits to the employees, family caregivers also benefit as the program provides them significant time to maintain or further their own careers. Without 14(c) family caregivers are often forced to forgo their own employment – impacting their personal finances and the broader American economy. VOR urges you to block President Biden’s proposed rule eliminating this critical work program.

Medicaid Reform

As the Administration embarks on reforming Medicaid to ensure efficiencies and accountability by providers and beneficiaries, VOR is here as a valuable resource. With decades of experience dealing with the many players in the system and with numerous varied approaches to oversight and care, VOR can provide useful specific, detailed recommendations on which proposals are most likely to add value to Medicaid while meeting your important goals of fiscal restraint and program integrity.

VOR stands ready to work with you to improve services and support available to our nation’s most vulnerable. We look forward to being a resource to you and your administration. Please reach out to our Executive Director, Hugo Dwyer, at hdwyervor@gmail.com at any point.