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Initial Report from Evaluation and Monitoring Subcommittee of the
Taskforce on Eliminating Subminimum Wage
(M. Alewine, D. Rotholz, S. Jordan)

The subgroup has discussed possible measures to achieve the intended goals. The focus has included potential measures we recommend for evaluation and monitoring, the process for data provision as well as recommended questions for inclusion in the consolidated survey that the taskforce has discussed developing.

We reviewed the measures and processes through which some other states address the issue we are focused on. This included publicly available information from Minnesota, Ohio, Maryland and Oregon. The measures we recommend for both initial evaluation of implementation of Act 209 (R237, S533) that prohibits the use of section 14(c) of the Fair Labor Standards Act of 1938 to pay subminimum wages in South Carolina and for ongoing monitoring are for individuals with disabilities:

- Wage per hour of work
- Gross wages per month
- Hours worked per month
- Benefits provided from job
 - Paid time off
- Type of job (job classification)
- Barriers and/or accommodations needed
- Type of disability

The sub-committee recommends leveraging existing data sources wherever possible. Known sources include DEW, Vocational Rehabilitation programs (SCVRD and SC Commission for the Blind), and DDSN (contracted provider data on employer information, location, wage, hours per week, wage reporting responsibility, job end date and reason). For DDSN operated waivers, employment service data includes number of individuals receiving individual employment service, individuals newly admitted to service, individual count by job loss reason by year, individual count by duration of employment by year. Data is also available to track number of individuals referred from DDSN to SCVRD, number of individuals closed successfully and receiving State Funded Follow Along funding, number of individuals requesting SCVRD case closure, number of individuals closed successfully, number of individuals closed unsuccessfully, and individuals never referred to SCVRD. Vocational Rehabilitation tracks employment outcomes after case closure for performance reporting; however, the limitation with this data set is it will only include individuals that received SCVRD services. Complementary data from DDSN will be necessary to fully evaluate and monitor individuals served in employment services through DDSN, specifically those that have transitioned or are transitioning from sub-minimum wage employment. The sub-committee recommends that DDSN resume reporting on the StateData national report on employment services and outcomes that is consolidated through ThinkWork! (Institute for Community Inclusion, UMass Boston,

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<https://www.communityinclusion.org/> and https://www.thinkwork.org/sites/default/files/files/state_data_2021_F.pdf) to allow for comparative data analysis.

This sub-committee recommends data aggregation and analysis twice per year for the seven identified measures, provided to a central database (new or existing but determined by this taskforce) by DDSN and/or their contract community-based provider, Vocational Rehabilitation and Commission for the Blind, and DEW. The subcommittee recognizes that further discussion is needed with the larger full taskforce related to what existing databases and reports may facilitate this process and who is designated to review, evaluate and report this information on a regular basis.

The sub-committee also recommends evaluation of data on employment services delivered through the DDSN operated waivers. Specifically, data on utilization of the three distinct employment services (career preparation, group employment, individual employment) to include length of time in career preparation services, and comparison of data from pre- and post-2022 when updates were made to service standards for employment services.