

The Disability and Aging Collaborative &



September 2, 2025

Daniel Navarrete
Division of Regulations, Legislation, and Interpretation
Wage and Hour Division,
U.S. Department of Labor
Room S-3502
200 Constitution Avenue NW
Washington, D.C. 20210

Comments on RIN 1235-AA51: Application of the Fair Labor Standards Act to Domestic Service.

Dear Mr. Navarrete:

The undersigned members of the Consortium for Constituents with Disabilities (CCD) Long Term Services and Supports (LTSS) Task Force, the Disability and Aging Collaborative (DAC), and allied organizations submit these comments to oppose the proposed rule, Application of the Fair Labor Standards Act to Domestic Service, by the Department of Labor (“Department” or “DOL”). We oppose the deregulation of this key workforce, and instead support the DOL’s proposed alternative to preserve the existing regulations that provide for a \$7.25 minimum hourly wage and overtime protections for the millions of workers who provide care and services in the home.

DAC is a coalition of approximately 60 national organizations that work together to advance long-term services and supports policy at the federal level. Formed in 2009, the DAC was one of the first coordinated efforts to bring together disability, labor, and aging organizations. CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of children and adults with disabilities in all aspects of society free from discrimination. DAC and CCD have a longstanding history of supporting people with disabilities and aging adults who need care, along with the family caregivers and care workers who provide that care.

The proposed rule will not only harm the workers directly impacted by the loss of basic labor protections, but also the people who rely on those workers to be the human infrastructure of care. Instead, we support labor protections for these workers, alongside increased funding and investment to expand access to care, not reduce it. The direct care workforce has long been undervalued, with a lack of adequate public funding to support wages forcing workers to take multiple jobs just to make ends meet or leave the industry altogether.

Federal minimum wage and overtime protections for home care workers are vital to addressing substandard working conditions, which result in dire impacts for workers and vacancies that prevent the industry from meeting the growing need for quality home care for aging adults and people with disabilities. The home care industry has already adjusted to providing these basic protections for over a decade. Removing essential pay rights now will only worsen the shortage of home care workers, harm the quality of care and services, and revert the industry to the unsustainable position that prompted the 2013 DOL rule.

Let us be clear: eliminating minimum wage and overtime protections will make it harder to recruit and retain qualified workers, increase turnover and training related costs for employers, worsen the care workforce crisis, and cause harm to the lives of people who depend on consistent, trusted relationships. For these reasons, we oppose the proposed rule, and support the proposed alternative of preserving the status quo under the current regulations that have been in effect for more than a decade. If you have any questions, please contact Nicole Jorwic, Chief Program Officer at Caring Across Generations, at nicole@caringacross.org.

Sincerely,

Access Ready Inc.
American Association on Health and Disability
American Civil Liberties Union
American Therapeutic Recreation Association
Association of University Centers on Disabilities
Autism Society of America
Autistic Self Advocacy Network
Autistic Women & Nonbinary Network
Bazelon Center for Mental Health Law
Caring Across Generations
CommunicationFIRST
Disability Belongs
Disability Rights Education and Defense Fund (DREDF)
Diverse Elders Coalition
Gerontological Society of America
Justice in Aging
Lakeshore Foundation
Little Lobbyists

Medicare Rights Center
MomsRising
National Alliance for Caregiving
National Association of Councils on Developmental Disabilities
National Association of Social Workers (NASW)
National Disability Rights Network (NDRN)
National Domestic Workers Alliance
National Health Law Program
National Partnership for Women & Families
National Respite Coalition
NHCOA
PHI
The Arc of the United States
Well Spouse Association