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# NATIONAL COUNCIL ON REHABILITATION EDUCATION

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*“A Professional Organization Dedicated to Quality Services for  
Persons with Disabilities through Education and Research”*

June 1, 2015

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The National Council on Rehabilitation Education (NCRE) is a professional organization of counselor educators dedicated to quality services for persons with disabilities through the implementation of quality education and research. NCRE advocates up-to-date counselor education and training and the maintenance of professional standards in the field of rehabilitation counseling. As rehabilitation counselor educators, our members prepare the professionals who are qualified to serve in the state agencies across the country who will be implementing WIOA.

NCRE wishes to offer comments specifically on the Comprehensive System of Personnel Development (CSPD) in WIOA.

There is concern that the new language in the WIOA opens up the VR personnel pool, but does not adequately address the skills needed by rehabilitation professionals to work with individuals with disabilities, employers, and other helping professionals. The skills and competencies for rehabilitation counselors have been established through over 30 years of research in the form of role and function studies. Failure to require such specialized skills and competencies goes against an extensive body of research and empirical evidence that documents the effectiveness of this specialized training. This contradicts the efforts to increase use of evidence-based practices for achieving successful employment outcomes among persons with disabilities, which has been a priority for the U.S. Department of Education and the international community as cited in the World Report on Disability, Published by the World Health Organization in 2011.

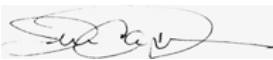
As rehabilitation counselor educators, we also believe it is counterintuitive to waive requirements for national certification in rehabilitation counseling. The Certified Rehabilitation Counselor (CRC) is the gold standard for those professionals who are serving people with disabilities in public vocational

rehabilitation programs, for vocational rehabilitation in the private sector, and is a key element of the professional identity of thousands of counselors in the United States. People with disabilities, including those receiving services from the Veteran's Administration, deserve skilled and qualified rehabilitation counselors, trained at the master's level, to assist them in obtaining not just any employment, but also find a career that is financially sustaining, and that can provide stability to their personal and social aspects of life.

In terms of specifics, we offer the following proposed changes:

- Revise 361.18(c)(1)(ii) to mirror the statute with regard to education and experience requirements for VR personnel.
- Add a new 361.18(c)(2)(ii) to describe what it means for personnel to have a 21st-century understanding of the evolving labor force and needs of individuals with disabilities.
- Provide examples (not all inclusive) of the skills that would demonstrate that personnel hired are appropriately qualified.
- Amend 361.18(d)(1)(i) to require that the CSPD include training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998.
- Delete provisions that are no longer applicable given statutory changes, such as those related to steps the State will take when personnel do not meet the highest standard in a State.
- Describe education and experience requirements, as applicable, at the Bachelor's, Master's, and Doctoral level, in fields related to rehabilitation that prepare professionals to work with individuals with disabilities and employers. Require personnel hired at the bachelor's level to have at least one year of paid or unpaid experience.
- Require that the CSPD include training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998.

Thank you again for this opportunity to provide input on the proposed regulations  
Respectfully submitted,



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