



COUNCIL OF STATE ADMINISTRATORS OF VOCATIONAL REHABILITATION

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Secretary Betsy DeVos
US Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Dear Secretary DeVos:

As CEO of the Council of State Administrators of Vocational Rehabilitation (CSAVR), I am writing on behalf of State VR Agencies to support the definition of Competitive Integrated Employment (CIE) contained in Title IV the Workforce Innovation and Opportunity Act (WIOA) and the regulatory guidance provided by the Rehabilitation Services Administration (RSA).

The CSAVR is composed of the chief administrators of the public rehabilitation agencies serving individuals with physical and mental disabilities in the States, District of Columbia, and the territories. These agencies constitute the state partners in the State-Federal program of rehabilitation services provided under the Rehabilitation Act of 1973, as amended. The Council's members supervise the rehabilitation of some 1.2 million persons with disabilities annually.

CSAVR members stand united against subminimum wage, as well as segregated and sheltered employment that trivializes the worth of people with disabilities. Moreover, CSAVR strongly supports initiatives that ensure that people with disabilities are able to achieve competitive integrated employment that leads to full economic self-sufficiency.

While CSAVR members are in agreement with the concepts and statutory definition of Competitive Integrated Employment, it is important to note that many in the disability employment community continue to weigh in on the conflict that exists in the requirement that 75% of the individuals who work on contracts under the Javits Wagner O'Day Act (JWOD) be individuals with disabilities and the Rehabilitation Act (Title IV of WIOA) which negates most of the employment opportunities in JWOD as meeting the definition of CIE. These conflicts must be addressed in a holistic manner in order for State VR agencies to continue to maximize employment opportunities for people with disabilities.

In several recent Hill visits we were told that some State VR Agencies are not referring individuals to Ability One Programs. Also in a recent Hearing of the House Education and Workforce Committee, a comment was made that a number of State VR Agencies had refused to send VR referrals to Ability One on the assumption that employment opportunities in Ability One did not meet the definition of Competitive Integrated Employment (CIE). Some of the confusion related to these referrals is the result of the conflicts noted above.

Until a statutory fix is realized for JWOD, we support that state VR agencies should continue to follow the guidance from the Rehabilitation Services Administration which directs them to look at each employment opportunity through JWOD on an individual basis as to whether or not that opportunity meets the definition of CIE.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen A. Wooderson". The signature is fluid and cursive, with a large initial "S" and "W".

Stephen A. Wooderson,
CEO CSAVR

Cc: Kim Richey
Carol Dobak