

Response to the Request for Information (RFI)

Department of Education

ID ED-2018-OSERS-0026

Request for Information Regarding Changes to the Rehabilitation Training Program

Submitted by: The Council of State Administrators of Vocational Rehabilitation

Section 1: Rehabilitation Long-Term Training Program

1.2. The Department currently provides funding in six of the possible 30 specialty areas. What are your recommendations for the specialty areas that the Department should support, given the changes in the Rehabilitation Act, as amended by WIOA, and the current needs of the State VR agencies?

Response: Given the changes in the Rehabilitation Act, as amended by WIOA, the long-term training focus must respond to the priorities of the Act and with an awareness that the Vocational Rehabilitation program is focused on careers, not just jobs. In order to accomplish this, there must be a focus on skills that support the development of working relationships with business, schools and other work-based training programs as well as WIOA core partners. Therefore, we believe the Department should reassess how the possible specialty areas are identified and defined. We recommend the Department support training in Serving Dual Customers, Developing Business Relations, Career Counseling, Services to Students in Transition, Developing Mutually Beneficial Partnerships for the Dual Customer, and Vocational Rehabilitation Leadership and Administration.

1.3. Should the Department fund bachelor-level programs, and, if so, should they be general VR counselor programs, areas other than VR counseling, or a combination of the two? Please explain.

Response: CSAVR believes bachelor-level training should be funded when viewed in context of the larger profession. Bachelor training programs that focus on the core competencies of the profession can permit graduates to be recruited into field positions that otherwise may be difficult to fill; and the state agency may then use blended course delivery (online and campus based) over a defined period to complete a master degree in vocational rehabilitation counseling. Additionally, consideration should be given to fund a five-year BS to Master Degree in Vocational Rehabilitation (see Section 3: Innovative Rehabilitation Training Program). As with other professions and industries, there should be consideration given to certification in specialized areas of expertise and the ability of VR agencies to consider “stackable credentials” as part of their human resources policies and practices.

While we are supportive of bachelor-level programs as suggested here and in Section 3, we do feel it is important to reemphasize the critical need for graduate programs that address

all WIOA priorities. Our “gold standard” remains to be well-trained Master’s level vocational rehabilitation counselors.

1.4. How do VR counseling degree or certificate programs ensure that they are adequately preparing VR counselors to meet skill demands now and in the future? How have VR counseling degree or certificate programs changed to address the requirements of the Rehabilitation Act, as amended by WIOA (e.g., requirements for preemployment transition services, emphasis on competitive integrated employment, etc.)?

Response: We believe the current rehabilitation counseling curriculum and the requirements specified by CACREP are not adequately preparing vocational rehabilitation counselors to meet current demands. Many of the requirements under CACREP are not relevant to vocational rehabilitation counseling. There have been no significant curriculum changes to address WIOA priorities. Currently, there are several state VR agencies that have had to develop in-house training programs for new VRCs because the current training is not totally meeting the needs. We recommend programs seeking and receiving RSA funding should be required to show that their curriculum aligns with demands of the state vocational rehabilitation agency and WIOA rather than it be tied to CACREP accreditation.

1.5. How do colleges and universities ensure that VR counselor programs remain current and effective in meeting State VR agencies’ CSPD requirements?

Response: We recommend the Department require all funded programs include an Advisory Body that includes representation from both customers of the VR program. Additionally, we believe the vocational rehabilitation long term training programs be required to establish an interdisciplinary team that effects an intersection of business, education and communications acumen into graduate level training. We also recommend that they do customer satisfaction surveys of the VR agencies they serve to get ongoing feedback as to the preparedness of their graduates to meet the work demands of the agencies, their customers, and WIOA. The programs should also be required to survey their graduates one year after placement as to their views of their preparedness and any suggestions for improving the training to better prepare future graduates.

1.6. How can the Department increase the percentage of scholars who (a) complete a VR counseling program, (b) obtain qualifying employment after completing the program, and (c) obtain employment in State VR agencies?

Response: There is the perception among some that counselors going to work in state VR agencies due to reporting requirements are more case managers than counselors. Individuals training to be counselors want to do counseling. They see the private sector as more of an opportunity to do counseling because there are fewer administrative requirements. Given this we need to look for ways to address the perception and reduce the administrative burden. Part of this is a training issue in terms of teaching trainees how to communicate efficiently and effectively and another part falls on us to identify ways or strategies to reduce the burden on the counselors. For example, if we could reduce the

reporting elements of the RSA 911 rather than seeing them continue to expand this would be one way of reducing that burden and addressing the issue of counselors being counselors not case managers.

1.7. Do the curricula used by VR counseling programs reflect the emerging trends and evidence-based practices in VR?

Response: Not consistently. We believe the current CACREP program standards have resulted in curricula being more focused on mental health counseling, diagnosis, and preparing individuals for counselor licensure. As a result, many programs have not kept pace with the emerging trends and evidence-based practices related to the career development of persons with disabilities and the dual customer mandate. The “vocational” aspect of VR counseling has been diminished; thus, impacting the core competencies required of a vocational rehabilitation counselor.

CSAVR leads the Vision 2020 initiative, which is intended to demonstrate that VR is driven by a commitment to people with disabilities and businesses at the intersection of training, career readiness, and competitive, integrated employment. As a step in reviewing the needs of our field, the state VR agency directors provided us with the following list of those skills they felt were needed most by vocational rehabilitation counselors entering this profession:

1. Understanding the connection between disability and the workplace – work place accommodations, critical thinking to adapt the situation for the individual
2. Working with business as a customer.
3. Understanding how to build an IPE that incorporates pertinent information obtained through the relationship with employers and industry representatives.
4. Resume writing and interview preparation
5. Labor market research/analysis
6. Ability to assess a work environment and develop a job analysis
7. Awareness of skills needed for the future workforce – too much short-sightedness. Will there be a job at the end of the training for which you’re training the consumer?
8. Analysis of transferable skill
9. Advocacy and negotiation skills
10. Teaching self-advocacy skills
11. Knowledge of services that have the biggest impact such as transportation access, job readiness skills, and SSI and SSDI, financial literacy (on-the-job learning)
12. Understanding incentives that impact employment. i.e. WOTC. Can also be disincentives on consumer side.
13. Understanding of effective ways for VRC to stay in touch with their customers (i.e. social media, apps, texting, and the ethical and confidentiality parameters associated with these tools
14. Knowing how to be resourceful to obtain information needed from a variety of locations/sources. This can include resources outside of state VR – professional associations, colleagues in other industries, etc.

15. Ability to frankly discuss pros and cons of service and employment choices and successfully negotiate with the customer as to their needs.
16. Ability to provide good case notes and documentation – writing style – being concise yet clear. Understanding what to include and what not to include in notes. Include what is necessary in a neutral manner. In writing notes, consider the audience and the potential for widespread sharing. Objective/verifiable information. Write/tell the case story so if file is transferred, it is easy to determine direction and why service decision were made.
17. Good math and budgeting skills and budgeting – ability to understand fee schedules and vendor pricing. Looking at the entire plan to cost out and be adaptable to make changes that occur over the life of the plan.
18. Good customer service skills – good counseling/listening/communicating skills.
19. The ability to “market” VR to individuals with disabilities and their families as well as businesses and employers. Understand how VR services benefit business and market those services.
20. Ability to have candid, frank personal conversations.
21. Ability to work effectively with vendors including clear communication of services desired, managing and following the work, intervening in a timely manner to address issues before they become problems, and provision of feedback to vendors. Staying on top of service-providers.
22. Ability to develop and maintain partnerships.
23. Clear understanding of CIE and ability to assess whether or not a potential placement meets it.
24. Knowledge of services available to customers from WIOA core partners and how customers can access those services
25. Ability to read and understand a budget spreadsheet.
26. Understanding of new and emerging cultures and their norms and impact on VR service delivery.
27. Appreciation of importance of benefits counseling and financial literacy
28. General understanding of WIOA, the Rehabilitation Act, and its accompanying Regulations

Implicated by the above list is the awareness that the role of the counselor has to be re-centered on those critical tasks that results in competitive integrated employment outcomes. In a recent CSAVR survey of VR staff across the country, respondents identified more than 30 different tasks performed by the VR counselor; many which could and should be the duties of administrative and specialty staff. Our pre-service training models need to focus on those skills directly impacting outcomes. Agency infrastructure and in service training then can be tailored to address the administrative expectations.

Curricula needs to be driven not by the role VR counselors play today, but rather the future role we expect counselors to play in the future.

CSAVR remains concerned for the business relations skills of vocational rehabilitation counselors. In the *Journal of Vocational Rehabilitation* 48 (2018) https://docs.wixstatic.com/ugd/2cb546_788793c1d40f4c3e8c4b1dd27c4cdd82.pdf, the

authors reached out to 64 state agencies asking what basic qualifications “business relations personnel” should possess. The most frequently selected qualifications were experience developing effective relationships with businesses ($n = 55$), knowledge of business and employment practices ($n = 53$), and experience with disability-related issues and solutions in the workplace ($n = 53$). Business-oriented skills (e.g., marketing and outreach, understanding of VR services available to business at a state and national level, business development) were more frequently selected than other proposed skill sets, such as staff development and training or strategic planning.

Respondents also proposed a number of additional qualifications and skills, such as the ability to meet the immediate needs of the business in a timely manner, sales and marketing experience, and training experience. Although 27 of the 61 respondents reported having no specific training for business relations staff, agencies that do offer such training provided sample training titles such as “Business Relationship Training,” “Business Relations 30-Day Training Plan,” and “Effective Employer Relationships.”

We strongly suggest that the Department take into consideration these emerging trends in pre-service training.

1.8. Currently, the Department provides colleges and universities with 5 year grants of up to \$200,000 annually for VR counseling programs and grants of up to \$150,000 annually for the other specialty areas. Are these funding levels appropriate? If not, what funding levels would be appropriate?

Response: CSAVR has limited experience with the funding levels of VR counseling programs and thus chooses not to weigh in on the appropriateness of the current structure. However, we do encourage maximum flexibility through nationally accredited Masters’ degree programs in rehabilitation counseling through distance learning so that all states and agencies have equal access to resources. As part of said flexibility, we urge that there be a mechanism for shifting of funding among training programs during the year if one has more demand than funding can support and a neighbor is being underutilized.

1.12. What is the effect of the requirement that scholars complete an internship in a State VR agency or related agency as part of their program? How has the requirement for internships at State VR agencies or related agencies affected the scholars’ ability to obtain qualifying employment? Should these internships be required? Are there other avenues for scholars to gain experience? Is there another method to ensure scholars receive experience beyond the practicum?

Response: We believe internships in a state vocational rehabilitation or related agency is essential and should be required. It provides scholars with the best opportunity for field experience that can only enhance their career choices upon graduation. For the state vocational rehabilitation agency, it is an opportunity to shape the future professional and ideally be a precursor for employment in the public program.

WIOA mandates services to our dual customers. Internships with business and industry that have corporate initiatives to attract and retain employees with disabilities and a relationship with the state vocational rehabilitation program should be explored as appropriate internship opportunities.

1.14. How has the merger of the Council on Rehabilitation Education (CORE) with the Council of Accreditation of Counseling and Related Educational Programs (CACREP) affected Long Term Training grantees? Is there anything in the current Long- Term Training grant program that is in conflict with the CACREP requirements?

Response: The CACREP curriculum requirements conflict with the core competencies required of the public vocational rehabilitation counselor. CACREP emphasizes mental health and counselor licensure, deemphasizes vocational rehabilitation counseling and ignores the dual customer mandate and other key requirements of WIOA. We believe the profession would be better served by having grantees focus on the necessary core domains related to vocational rehabilitation counseling.

1.15. How have the changes in WIOA related to CSPD benefited or hurt Long- Term Training grantees? Are there any new Long-Term Training needs as a result of these changes?

Response: We believe the CSPD changes in WIOA have set a dangerous precedent for those vocational rehabilitation agencies that have not established or enforced a state level counselor education standard. This cannot be beneficial to the establishment of long-term training curricula that responds to the changes in WIOA that demand increased responsiveness to the dual customer focus and mandated transition services for students with disabilities.

For reference, CSAVR recently surveyed state vocational rehabilitation agencies regarding the changes in WIOA related to CSPD standards by asking the following question:

Have you reduced the minimum educational requirements for VR counselors from a Master's degree in rehabilitation or closely related field during the last couple of years?

- 8% of responses indicated yes
- 92% of responses indicated no

What is the minimum level of education in rehabilitation or a closely related field that you will accept for VR counselors?

- 33% of responses indicated Bachelors
- 65% or responses indicated Masters

As noted earlier in our comments, the Master's degree remains the gold standard for us.

1.16. RSA supported a much larger number of masters level Long-Term Training grants in recent years than in the past. Are the VR masters degree programs able to find enough qualified scholars?

Response: The short answer is No. We believe attracting potential scholars into long term training programs has just as much to do with the access to programs as does the need to focus on the vocational rehabilitation counseling field as a career choice, not as a coincidental by-product of the larger counseling profession. In the summer and fall of 2017, CSAVR surveyed state vocational rehabilitation agencies asking the following questions:

Do any schools in your state or neighboring states, offer accredited post-secondary rehabilitation programs at any of the following degree levels?

- 37% of responses indicated Bachelors level
- 20% of responses indicated Certificate level
- 92% of responses indicated Masters level

Think about how difficult it has been for your agency to find and hire VR counselors with Master's degrees during the last couple of years. Please select the option below that best describes your agency's ability to find and hire VR counselors with a Master's degree in rehabilitation or related field during the last couple of years.

- 59% of responses indicated increased difficulty
- 30% of responses indicated no change
- 2% of responses indicated easier
- 9 % responses indicated unknown

Section 2: Short-Term Rehabilitation Training Program

2.1. Should the Department direct more resources to Short-Term Training?

Response: Yes

2.2. Have the existing Short-Term Training resources met State VR agency needs? If not, how could existing resources be better leveraged or additional resources be used to meet needs?

Response: No. Upon researching short-term training funded by RSA in the past, it appears the focus has been on the Client Assistance Program. With the implementation of WIOA, short-term training needs have not kept pace with the ever-changing training needs for staff in a WIOA world. One possibility is leveraging the ability of the TAC's to assist in both online and personal delivery of curriculum around the topics listed below. Pair their current funding with some additional funding and add a focus which meets the short-term training needs. Another possibility is leveraging coursework developed through a

partnership with programs such as UA Currents and Washington State and their VR Supervisor Academy. Provide stipends that can be used for states demonstrating financial difficulty to send staff to that training. Ensuring that VR has trained qualified future leaders is crucial to the longevity of the program. In this regard another possibility is ensuring funding for a National Rehabilitation Leadership Institute such as the one currently housed at San Diego State University.

Additionally, in the spirit of WIOA's emphasis on innovation, short-term resources developed for the field must embed the principles of critical thinking and change leadership as well as an awareness of research findings and their possible application to improve VR services and outcomes.

2.3. What Short-Term Training areas are the greatest needs for State VR agencies, especially given the changes in WIOA?

Response: Trainings in the areas of Autism, adjudicated adult and youth offenders, customized employment, networking/building effective working relationships with core/community partners and stakeholders, substance abuse disorders, provision of VR services for older customers, services to immigrants and new and emerging populations, Pre-Employment Transition Service delivery and effectively working with students, families, and the IEP teams, Dual Customer-Employer Engagement, and training regarding the management of public VR programs.

In the area of Autism, RSA data shows the number of customers served whose primary disability is Autism went from 4,658 in 2010 to 13,171 in 2017.

2.4. How can this program better support State VR agencies as they implement their CSPD?

Response: Fund this activity at a level so that states can actually have staff that are trained and can perform the work in a WIOA world. Approve short-term training pertaining to the evolving labor force in various regions and guidance/best practices regarding training coordination with other entities under the Assistive Technology Act.

2.5. How can the Short-Term Training program address the need for no-cost preparation for VR professionals?

Response: The more you can leverage online accessible training platforms and established curriculum in the above-mentioned areas, states can use those resources to deliver training to staff as well as reduce lost production time by having staff have to travel to and from trainings.

Section 3: Innovative Rehabilitation Training Program

3.1. Should the Department fund grants under this authority?

Response: Yes, absolutely. CSAVR believes that the specific training needs of rehabilitation counselors are no longer being met with the existing training models, programs, methods and CACREP program requirements. Evidence of this decline in core rehabilitation competencies is the declining scores of recent graduates on the Commission on Rehabilitation Counselor Certification (CRC) exam. Further, young counselors coming into the field have different learning styles and there is a need to explore training delivery models that are more in keeping with the learning methods of the current counselors and identify new effective methodologies that are not only responsive to the learning needs and also make the best use of current technology to allow trainings to be provided in the most efficient and cost effective manners. Thus, there is a significant need for funding multiple projects focused on developing new and innovative training models and methods, demonstrating their effectiveness, and ensuring the programs meet the needs of the 21st century public, private, and non-profit VR agencies and their customers.

3.2. What topical areas would best support State VR agencies' implementation of the requirements in WIOA?

Response: The following are topical areas that would best support VR agencies in their implementation of WIOA:

Core Knowledge Domains

1. Career Development and Employment
 - a. Career Development of People with Disabilities
 - b. Occupational Analysis
 - c. Demand-Side Employment
 - d. Transition School to Work
 - e. Competitive Integrated Employment, Customized Employment and Supported Employment
 - f. Business based training, including internships and apprenticeships
2. Medical and Psychosocial Aspects of Disability and Chronic Health
3. Rehabilitation and Health Systems and Processes
4. Legislative and Legal Aspects of Disability and Chronic Health
5. Professional and Ethical Standards
6. Financial Literacy
7. WIOA Core Partners and the Services They Provide
8. Understanding of Cultural Norms of Unserved and Underserved Populations
9. Understanding of Needs of Business as a Customer
 - a. Shift from job placement to business relations
 - b. Strategic planning with a business
 - c. Disability Management
 - d. Employment law and regulations – individual and business perspective
 - e. The Business case: disability as part of a diversity and inclusion strategy
10. Job Retention
11. Veterans
12. Areas of Specialization – Autism, TBI, PTSD, Mental/Behavioral Health, Aging in the workplace, AT and Rehabilitation Engineering

Core Skill Domains

1. Counseling
 - a. Personal Adjustment
 - b. Vocational & Career
2. Individual Assessment and Vocational Evaluation
3. Case Management
4. Building and Maintaining Partnerships
5. The Art of Negotiation
6. Resource Development and Management
7. Career Counseling

3.3. In recent years, a number of VR counseling programs have closed, including programs that had Long-Term Training grant funding. Is there a more innovative way to deliver VR counselor programs? If so, please describe.

Response: The expanding number of credit hours required by accreditation agencies and the recruitment of students who express a stronger allegiance to mental health counseling are program delivery factors that have contributed to a decline in rehabilitation counseling programs as well as the fact that fewer and fewer students are attracted to our profession. There is a strong need to develop innovative training models and programs that are more conducive to the recruitment, training, and development of rehabilitation counselors who are prepared to meet the demands of the State VR program and partnering with core WIOA partners and private and not for profit rehabilitation agencies to deliver effective vocational rehabilitation counseling services. We believe innovative programing development should revolve around the following principles:

- 1) Reduce the number of credit hours to complete a rehabilitation counseling master degree to 36 credit hours.
- 2) The curriculum should focus on psychosocial adjustment and employment of people with disabilities. Working with business as a customer in understanding changing labor market needs and work environments. Graduate curriculum should be based on the domains listed in previous question.
- 3) Field experiences should be imbedded in every semester, across multiple core courses, and aligned with course sequencing to facilitate field-based learning.
- 4) Utilize a Bachelors plus one option (BS-Master degree in RC) to recruit more undergraduates to the field. Specifically, after the student's junior year an individual can be accepted into the master degree rehabilitation counseling program and utilize their fourth year of undergraduate study toward their master degree. This would allow the student to complete the program with one additional year of study after their undergraduate degree reducing both time and cost.
- 5) Blended online and off campus course delivery that can facilitate effective and timely training to existing VR personnel and other adults currently working full-time in rehabilitation.
- 6) Explore the potential for a consortium model of training involving multiple university partners.

- 7) Training aligned with field experience and practice.
- 8) Continuing education to reflect customer trends – changes in disability conditions and growing populations, employment needs of business, changing work environments and rehabilitation technology developments.

In addition to the above, a hard look at what counselors are being asked to do should be taken. Again, the perception among many is that counselors working in the public VR program are more and more becoming case managers and less counselors with more time being taken up by paperwork leaving less and less time to work with the customers and practice counseling. As we look at the question of recruitment, we must address this perception and the degree of truth that perpetuates it by looking at ways to reduce the administrative burden on counselors so they can practice what they came into the field to do. Thus, we must look at the reporting requirements to see how we can lessen the burden on the counselor. In the last issue of the RSA 911 the required information significantly increased with more administrative burden ultimately being placed on the counselor. Possibly, we should look to the private sector and study their reporting requirements and systems to get ideas for administrative burden reduction on counselors.

3.4. What type of innovative training projects might be supported to develop a new training curriculum to address system changes resulting from implementation of the requirements in WIOA?

Response: Given the requirements of the WIOA, we feel it would be important to provide funding to multiple university programs to develop and evaluate the effectiveness of a rehabilitation-counseling curriculum that specifically prepares professionals and paraprofessionals to provide services according to the requirements of the WIOA and amendments to the Rehabilitation Act. In developing these innovative programs, universities should seek input through a mechanism such as an advisory body from key stakeholder groups including State Directors (CSAVR & NCSAB), Community Rehabilitation Programs, Business, State Rehabilitation Councils (SRCs) and CRCC as part of the program development and evaluation process to ensure core curriculum elements are directly related to the WIOA and that the curriculum provides evidence of knowledge acquisition. Also, input should be sought from counselors who have graduated from existing long terms training programs within the last five years or less to get input as to how well in their eyes the curriculum prepared them to work in the agencies and the field.

In addition to the development of a full master degree program, it would also be important to explore the effectiveness of using complementary certificate programs that could be targeted to train existing staff, individuals with related degrees (i.e. social work, counseling, human resources), individual agency counselors with undergraduate degrees, or paraprofessionals. Also, the idea of credentialing should be explored to test the effectiveness of creating specializations in key areas such as transition, mental health, and business relations.

In exploring credentialing, especially the concept of stackable credentials, attention should be given to the possibility of developing a professional credential scale. This would

encourage academia to develop credential-based curriculum, state agencies could attract and train staff on key specializations, and the national model could then be used to recruit and retain more counselors in the field and influence state salary standards.

3.5. What type of innovative training project might be supported to prepare VR professionals and paraprofessionals to have a 21st-century understanding of the evolving labor force and the needs of individuals with disabilities?

Response: Preparing VR professionals and paraprofessionals to have a 21st-century understanding of the evolving labor force and the needs of individuals with disabilities as well as those of business will require multiple approaches. In addition to providing funding to university programs to develop rehabilitation-counseling curriculum that specifically prepares professionals and paraprofessionals to provide services according to the requirements of the WIOA, funding also should be made available to state VR agencies to assist them with developing and testing training to supplement that coming from the universities for professionals and also increase the skills of paraprofessionals.

Any training for paraprofessionals should offer a bridge to make it easy for paraprofessionals to shift to be trained as professionals. In developing these programs again input should be sought from key stakeholders including State Directors (CSAVR & NCSAB), Community Rehabilitation Programs, Business, State Rehabilitation Councils (SRCs) and CRCC as part of the program development and evaluation process to ensure core curriculum elements are directly related to the WIOA and that the curriculum provides evidence of knowledge acquisition.

Also, input should be sought from professionals and paraprofessionals who have completed the training programs within the last five years or less to get input on the proposed curriculum and whether or not it would have better prepared them to work in the public VR field.

In terms of the paraprofessionals, more input should be sought as to how state VR agencies might be using these individuals.