



To: The Rehabilitation Services Administration (RSA)

From: The National Rehabilitation Counselors and Educators Association (RCEA)

Re: Response to the Request for Information (RFI) on the Future of the Rehabilitation Training Program

Date: July 2, 2018

BACKGROUND

The goal of the public Vocational Rehabilitation (VR) program is to provide an array of time-limited yet specialized services leading to improved outcomes in competitive employment. The resulting longer-term impact goals include financial stability and empowerment, improved health, and greater community integration and inclusion of individuals with significant disabilities.

Research indicates clear differences in vocational outcomes for individuals with the most significant disabilities receiving public VR services from master's-level rehabilitation counselors (Sherman et al., 2018). As many state VR programs move into an Order of Selection (OOS), it will be increasingly important for counselors working in the VR program to have the knowledge, skills, and competencies to effectively serve individuals with the most significant disabilities as these individuals will likely represent a substantial percentage of those served through the program.

Consistent with input provided by the National Rehabilitation Association (NRA), qualified rehabilitation counselors, in both the public and private sectors, possess the specialized skill sets needed by personnel who are providing VR services to individuals with disabilities, veterans, and an aging population. These specialized skill sets include: (a) counseling and guidance; (b) knowledge and appreciation of the medical and psychological aspects of disability; (c) knowledge and implementation of vocational assessment strategies and application of transferable skills, working knowledge and integration of labor market data pertaining to employment of individuals with disabilities; (d) skills and abilities to match business workforce needs with the client's skills and talents; and (e) providing services required to develop and implement an individualized career plan that enables the individual to be successfully employed in a competitive, integrated work environment.

The National Rehabilitation Counselors and Educations Association (RCEA), the primary professional rehabilitation counseling division within NRA, collectively represents 462 rehabilitation professionals nationally. Our membership is comprised of rehabilitation counselors and educators who share a collective interest in promoting the full inclusion of individuals with disabilities in society, with a specific goal of fostering competitive integrated employment and

financial empowerment outcomes. Many of our members are employed in State Vocational Rehabilitation (VR) programs.

RECOMMENDATIONS

Rehabilitation Long-Term Training Program

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

Yes. It will be increasingly important to support capacity building through bachelor-level programs as well as master's-level programs. As a matter of efficiency and effective resource management, state VR programs will need to consider contemporary team approaches to case and caseload management in the future. It is impractical to expect a master's-level rehabilitation counselor to effectively handle all elements of each case from eligibility determination through case closure with an average caseload of 100 consumers. Rather, a master's-level rehabilitation counselor can serve in a leadership capacity to coordinate team efforts with each case and provide key counseling services, while individuals with bachelor's degrees can serve as members of the team and ensure timely service delivery, transportation, link with Community Rehabilitation Providers, assist with 911 data entry and quality assurance, etc. However, in order to effectively implement a model such as this, it is important to have trained and knowledgeable master's and bachelor-level professionals in place.

Additionally, it may be beneficial to support specialized training options to the bachelor-level program to address issues specific to improving outcomes with VR clientele. Requiring foundational coursework in rehabilitation and vocational issues with options to then "specialize" in certain areas may be beneficial. Examples include Independent Living Specialist, Transportation Specialist, Work Incentives Benefits Specialist, Assistive Technology Professional, etc. Professionals with these specializations could work as team members within VR and/or be available internally to directly support VR consumers in meeting these needs. The content could also be used to offer post-degree certificate options for those with bachelor's degrees in areas other than rehabilitation, who happen to be employed in State VR agencies, but need to gain relevant skills and knowledge in order to improve competencies.

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

While counseling program curricula continually evolve to reflect emerging trends and evidence-based practices, flexibility in substantially modifying for-credit program curriculum has limitations. Additionally, RSA may want to consider directing a limited amount of LTT funds to support post-degree certificate programs that emphasize best evidence-based practices (EBP) reflecting contemporary trends and needs. Examples include certificate programs highlighting EBP such Motivational Interviewing, Supported Employment/Individual Placement and Support (IPS), Customized Employment, Evaluation and Quality Assurance, etc.

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?

Internships at State VR agencies serve an important role in multiple regards. They provide an excellent opportunity for students to learn the role of the State VR program, gain experience in

caseload management, develop professional references and networks, and better understand the network of services and systems involved. It also provides the State VR program with a direct pipeline of qualified future professionals to recruit into vacancies.

However, it is recommended that RSA consider allowing other practicum and internship opportunities as well. Internship experience with community providers, veterans programs, rehabilitation hospitals, workforce partners, community-based long-term supports, Supported Employment, mental health programs, schools, Blind programs, American Indian Vocational Rehabilitation Services (AIVRS), and others representing the variety of professional environments where rehabilitation counselors are employed all serve a valuable role. As long as the internship is focused on full inclusion, improving the competitive integrated employment opportunities and financial empowerment of individuals with disabilities, and actively partners with and/or serves State VR program clientele, it should be allowable as practicum or internship experience.

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?

The merger of CORE into CACREP is resulting in longer training periods, with many master's-level programs moving from 48 to 60 credits in order to meet state licensure requirements. Aligned with this movement toward state licensure at the master's-level is a substantial re-working of course curriculum to meet credentialing requirements.

Are there sufficient vacancies for scholars to find employment in the State VR agencies, or in agencies that have agreements with the State VR agencies, especially for States that have multiple Long-Term Training awards?

As noted by NRA, vocational rehabilitation agencies have been experiencing substantial turnover due to the retirement of a sizeable number of qualified VR counselors which also affects Community Rehabilitation Programs (CRPs) and other qualified private providers. According to 2013 data from State VR agencies, there were 1,622 vacancies (9.1%) out of 17,655 total positions nationwide in these offices. Over the next 5 years, these agencies project an additional 5,201 vacancies. Consequently, State VR agencies may need to successfully fill 39% of existing positions just to maintain current staffing levels in the near future.

According to the U.S. Bureau of Labor Statistics, Occupational Handbook (2016-2017), the need for qualified rehabilitation counselors, whose entry-level education is a Master's degree in rehabilitation counseling, will grow 9 percent faster than the average. This growth will take into account increased emphasis on working with youth and students with disabilities, the aging population who will require rehabilitation services to retain or regain a career, veterans, and an increased emphasis on serving individuals with the most significant disabilities.

To address this issue, the Department of Education has focused considerable resources on long-term training and is seeking to further target funds to address these areas of greatest need. Seventy-five percent (75%) of the funds awarded to universities under the Long-Term Training Program (LTT) go directly to students for tuition assistance and stipends.

Rehabilitation Short-Term Training Program

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

Yes. While the Long-Term Training program creates a pipeline of qualified professionals to work in the State VR program, additional resources are needed support the ongoing training needs of individuals from a variety of background serving in various roles within the state agencies. Historically, State VR programs supported their counselors and staff in joining professional membership organizations as one avenue for accessing ongoing training and supporting connection to a broader professional rehabilitation identity. Within the past 10 years, many state VR programs have moved away from supporting such efforts, primarily due to budgetary issues, and consequently, the demographics of the national membership organizations have changed substantially.

Preliminary data from the spring 2018 RCEA national membership survey provides a snapshot of input from rehabilitation professionals across 29 states. 58% of respondents indicate employment with a state VR agency and 54% are at least 55 years old. 38% indicate being 35 to 54 years old and only 8% identify as younger individuals under the age of 35. 48% of respondents indicate having more than 20 years of experience in the field while only 10% indicate having worked as a Rehabilitation Counselor for five years or less. 86% hold the Certified Rehabilitation Counselor (CRC) credential and 21% indicated being Licensed Professional Counselors (LPC). It is important to note that 75% of respondents indicated membership in a national organization as being key to their professional identity as a rehabilitation counselor and they actively noted the need for ongoing training and networking opportunities.

83% of respondents indicated a preference for in-person training although 67% also identified online courses and webinars as effective in meeting their training needs.

While not all professionals opt to join membership organizations, this data serves as an indicator for a critical need to attract and support younger rehabilitation professionals to meet the staffing needs within agencies in the near future. Having experience and depth in rehabilitation staffing structures is important and there is serious concern about a disproportionately aging workforce in this profession.

Innovative Rehabilitation Training Program

Should the Department fund grants under this authority?

Yes.

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

June 2018 responses from the RCEA membership indicate interest in the following training topics:

66% Disability-specific topics (i.e. mental health, physical disability, Autism Spectrum Disorders, etc.)

62% Dynamic discussion regarding current legislative changes and their impact on the field of Rehabilitation Counseling

56%	Employer engagement
53%	Evidence-Based Practices and Knowledge Translation
39%	Youth in Transition
32%	Research and evaluation
24%	Work Incentives Benefits Counseling
31%	Private Rehabilitation (vocational expert testimony, life care planning, workers compensation, other forensic work, etc.)
18%	Financial Literacy and Asset Development Strategies
12%	Workforce Innovation and Opportunity Act (WIOA)
5%	Council for Accreditation of Counseling & Related Educational Programs (CACREP) merger

Additional topics noted include: ethics, multicultural content, veterans, Assistive Technology, serving those also receiving funding/services through Home and Community-Based Services (HCBS) Medicaid waivers.

Ideas for specific innovative opportunities that would benefit rehabilitation professionals, the state VR system, and consumers include:

1. Improve identification and integration of evidence-based practices and management into Vocational Rehabilitation service delivery. This can be developed as a tiered model including a) development of specific topical elements for faculty teaching master's and bachelor's-level professionals to easily integrate into existing curricula while still meeting the CACREP and licensure requirements, b) a post-degree certificate program, and c) a series of ongoing, topically focused professional development sessions.
2. Develop and pilot a self-directed professional development tool that counselors and rehabilitation staff can use to measure knowledge gain, application, and competencies based on WIOA requirements and professional interest. The tool should be nimble enough to encourage participation by a) rehabilitation counselors with a master's degree, b) rehabilitation professionals with a bachelor's degree, c) rehabilitation paraprofessionals, and d) rehabilitation administrators. It can align with ongoing continuing education credit needs as well.
3. Development and integration of contemporary technology into VR service delivery. This includes the implementation of tools such as "apps", examples of policy for VR agencies to use in purchasing and integrating the tools in practice, and encouraging a format that includes VR consumers in accessing their Individual Plans for Employment (IPE) information using this technology. A relevant example can be found in medical providers and health insurance where patient engagement is encouraged through use of technological portals and apps.

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.

As noted by NRA, VR Training Programs are now or should be CACREP accredited. Some programs were unable to meet the CACREP requirements or did not receive support from their Institutions. Long-Term Training Grants assist those master level VR Counseling Programs attract students who wish to become qualified rehabilitation counselors. Such programs should offer course instruction either in-person, on-line or a combination of the two. Schools that offer course content in a variety of ways will attract those looking to get into the field of rehabilitation counseling and those already employment in para-professional positions looking to move up and become rehabilitation counselors.

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?

Projects that seek to train rehabilitation professionals in evidence based and promising practices are needed to assist counselors in selecting strategies that are shown to work. Funding for research on state VR agency WIOA implementation and outcomes, as well as knowledge translation projects, can assist in the development of new curriculum to address changes brought about by the WIOA.

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?

Funding for projects within Institutions of Higher Education that have both undergraduate and graduate programs in Rehabilitation should be encouraged to work together to develop programs or projects that address the needs of individuals with disabilities and workforce needs in the 21st Century. Such projects should outline the appropriate roles within the VR system for both undergraduate and graduate students upon graduation. Funding to support contemporary vocational evaluation and assessment and rehabilitation counseling programs to work together to address the needs of the labor force and people with disabilities should also be considered.

SUMMARY

Given the limited amount of funding available to prepare rehabilitation professionals to work in state vocational rehabilitation agencies, the National Rehabilitation Counselors and Educators Association (RCEA) respectfully requests this important training to continue, given the increasing number of individuals who will be eligible to receive the individualized services and supports by qualified rehabilitation counselors. It is critically important to have qualified rehabilitation counselor with master's degrees in Rehabilitation Counseling, serving people with disabilities. To that end, we believe that funding in support of the training of master's level rehabilitation counselors is key to maintaining a counseling workforce prepared to assist people with the most significant disabilities obtain self-sufficiency. Furthermore, it will be important to fund rehabilitation capacity building at the bachelor's level to provide ongoing opportunities to improve and maintain competencies for those supporting the rehabilitation process through a variety of roles.

Currently, there are CACREP accredited rehabilitation counseling masters programs preparing students for jobs in state-federal vocational rehabilitation counseling programs, community rehabilitation programs and other private non-profit and for profits organizations that have received no recent long or short-term training grant funds. These programs, along with programs eligible for renewal, must be provided the opportunity for to apply for funding to assist their students in becoming professional, qualified providers of rehabilitation counseling services

in support of people with disabilities. The profession of rehabilitation counseling has a long and successful history of assisting people with disabilities to obtain opportunities to better their lives. Money invested in this profession, and the professionals our rehabilitation counseling masters programs produce, is a good investment in assisting people to become self-sustaining tax-payers.

Respectfully submitted,

The 2018 Board of Directors
National Rehabilitation Counselors and Educators Association (RCEA)