August 27, 2014

Dear Colleagues:

The Commission on Rehabilitation Counselor Certification (CRCC) is responding to the invitation to share feedback and comments regarding the Workforce Innovation and Opportunity Act (WIOA). CRCC’s comments focus on H.R. 803; Title IV; Sec. 412(a)(4)(B), which amends the Comprehensive System of Personnel Development (CSPD) requirements.

We believe regulations should be established in a manner that maintains the highest level of qualifications for both agency and contracted vocational rehabilitation counselors, consistent with national standards that require adherence to high standards of ethical practice and commitment to life-long learning; thereby enhancing the quality of services provided to people with disabilities.

Importantly, we note and support maintaining the prior provision in Sec. 412(a)(4)(B)(i) which requires State plans to establish and maintain standards consistent with any national or State approved or recognized certification, licensing, registration, or other comparable requirements that apply to the area in which such personnel are providing vocational rehabilitation services.

Standards for Vocational Rehabilitation Counselors

Vocational rehabilitation counseling is a highly-skilled service built upon a profession with a foundation of specific advanced coursework at the master’s level that is focused on rehabilitation and disability matters as well as counseling knowledge and skills. The profession of rehabilitation counseling also has a long-established and well-recognized national certification for professionals providing rehabilitation counseling services – the Certified Rehabilitation Counselor (CRC) certification – where eligibility criteria require this specific, master’s level of education.

Therefore, we recommend that regulations be clarified to require State plans to establish and maintain standards for vocational rehabilitation counselors that require the national standard of CRC certification. Where hiring efforts fail to identify an individual qualified at this level, State plans should focus requirements on master’s degrees within the rehabilitation disciplines, consistent with CRC educational criteria, with a reasonable timeframe for achievement of CRC certification.

Standards for Other Service Providers

We also recommend that amendments to the CSPD requirements in Sec. 412(a)(4)(B)(ii) be clarified in regulation to apply to other rehabilitation service providers for whom national or State standards applicable to the specific area of service do not already exist. For example, appropriate degrees for personnel such as rehabilitation technicians/assistants may include a bachelor’s degree in the rehabilitation disciplines, whereas personnel
providing administrative or clerical services would more appropriately include degrees unrelated to rehabilitation.

CRCC is the certifying body for over 17,000 Certified Rehabilitation Counselors nationwide, a great number of whom are employed in state vocational rehabilitation agencies and state agencies for the blind. CRCC, and our many CRCs, understand the positive impacts gained from master’s level education focused on rehabilitation, disability, and counseling. We implore you to uphold requirements for proper credentials.

We welcome you to view The Art of Rehabilitation Counseling video (click here for open caption version), which provides compelling support for these recommendations. We appreciate your careful consideration of our recommendations as regulations are written with high-quality consumer services in mind.

Sincerely,

Patricia A. Costantini, RN, MEd, CRC, LPC
Board President

cc: Cindy A. Chapman, CAE, Executive Director, CRCC