

1699 East Woodfield Road, Suite 300, Schaumburg, Illinois 60173

July 22, 2013

The Honorable Tom Harkin, Chairman

Health, Education, Labor and Pensions Committee

The Honorable Lamar Alexander, Ranking Member

Health, Education, Labor and Pensions Committee

**Re: Request by the Commission on Rehabilitation Counselor Certification (CRCC) to maintain the location of the Rehabilitation Services Administration (RSA) within the US Department of Education (DOE) in the Bipartisan Discussion Draft of Title V to reauthorize the Workforce Investment Act.**

Dear Chairman Harkin and Ranking Member Alexander:

On behalf of the CRCC, I am respectfully submitting additional comments in support of our Letter of Opposition sent on July 21, 2013. This is in response to the proposed changes to the Rehabilitation Act of 1973, as amended, as a bipartisan effort to strengthen employment opportunities, research, and independent living services and supports for individuals with disabilities.

Regarding CRCC comments, I refer specifically to the following language in the proposed changes to the Rehabilitation Act:

**Rehabilitation Act of 1973**

**Title I – Vocational Rehabilitation Services; Part A – General Provisions**

**Section 101 – State Plans; (7) Comprehensive System of Personnel Development**

**(B) set forth policies and procedures relating to the establishment and maintenance of standards to ensure that personnel, including rehabilitation professionals and paraprofessionals, needed within the designated State unit to carry out this part are appropriately and adequately prepared and trained;**

**“(I)(aa) attainment of a baccalaureate degree in a field of study reasonably related to vocational rehabilitation, to indicate a level of competency and skill demonstrating basic preparation in a field of study such as vocational rehabilitation counseling, social work, psychology, disability studies, business administration, human resources, special education, supported employment, customized employment, job placement, economics, or any other field that reasonably prepares individuals to work with consumer and employers;**

**“(II) attainment of a master’s or doctoral degree in a field of study such as vocational rehabilitation counseling, law, social work, psychology, disability studies, business administration human resources, special education, management, public administration, or another field that reasonably provides competence in the employment sector, in a disability field, or in both business-related and rehabilitation-related fields;**

**Weakening Qualifications for the CSPD**

An area of serious concern to the CRCC is the weakening of the qualifications for the Comprehensive System of Personnel Development (CSPD) in the Senate Bipartisan Discussion Draft.

To that point, proposed changes to the Vocational Rehabilitation Act place specific emphasis on **“high expectations and competitive integrated employment”** for individuals with disabilities, particularly for youth/students with significant disabilities.

To deliver these “high expectations” it is imperative to ensure that these individuals, and especially youth/students with significant disabilities, receive the very best counseling services available, services that must be delivered by highly trained rehabilitation counseling professionals with a Masters-level education and the CRC Certification.

In support, the results of a 2006 Meta-analysis of research studies conducted by Dr. Michael Frain and his colleagues showed an average client with a disability working with a rehabilitation counselor with a master’s degree is more successful than 58% of the clients working with a counselor with a degree in a “related” field.

Dr. Elizabeth Van Houtte presented her doctoral dissertation research in 2010, which analyzed successful versus unsuccessful cases closures in New Jersey from 1996 – 2004. Dr. Van Houtte’s research showed that when a master’s trained rehabilitation counselor provides services to an individual with a disability, it results in a decrease in overall expenditures, an increase in client earnings, and a significant decrease in the total amount of service time.

**Minimal Education Requirements – Masters Level Training & CRC Certification**

To ensure individuals with disabilities receive the very best counseling services available, a master’s degree, combined with CRC Certification (passing the Certified Rehabilitation Counselor Exam, or CRCE), provides a clear point of differentiation through an:

* Advanced level of education and training not included in other program curriculums.
* Adherence to rigid standards of ethical practice as outlined in the CRCC Code of Professional Ethics for Rehabilitation Counselors (Code).
* Established commitment to lifelong learning through Continuing Education requirements needed for renewal of CRC Certification.

While a master’s degree in rehabilitation counseling would be the most preferred degree and, along with a CRC certification, could be the standard for new hires, the CRC eligibility criteria also recognize the other pathways into the profession of rehabilitation counseling through its criteria for Category R. Qualified individuals with advanced degrees in thirteen areas of study may be eligible to sit for the CRCE, providing they meet the additional coursework requirements of a post-graduate advanced certificate or degree that requires graduate coursework in areas aligned with empirical research on the knowledge requirements for rehabilitation counselors. These include coursework on:

* Theories and Techniques of Counseling
* Foundations of Rehabilitation Counseling
* Assessment
* Occupational Information or Job Placement
* Medical Aspects of Disability
* Psychosocial Aspects of Disability
* Multicultural Issues
* Case Management and Rehabilitation Services

Qualifying Degrees include Master’s, Specialist, or Doctoral Degrees in:

* Behavioral Health
* Behavioral Science
* Disability Studies
* Human Services
* Marriage and Family Therapy
* Occupational Therapy
* Psychology
* Psychometrics
* Rehabilitation Administration/Services
* Social Work
* Special Education
* Vocational Assessment/Evaluation

CRCC unequivocally supports a minimum of a master’s degree and CRC certification as the criteria under the Comprehensive System of Personnel Development outlined in Section 101(7)(B). Should the requirement of a master’s degree specifically in rehabilitation counseling be too narrow, we believe the framework provided by our Category R criteria establishes a reasonable alternative that recognizes individuals who have the necessary coursework aligned with empirical research to deliver high quality services.

**In Conclusion**

On behalf of CRCC, I would like to thank Senator Tom Harkin, Chairman, Health, Education, Labor and Pension (HELP) Committee, Senator Lamar Alexander, Ranking Member, Health, Education, Labor and Pension (HELP) Committee, and all of the members of the HELP Committee for taking the time to consider our points of view with regards to opposition to proposed changes to the Vocational Rehabilitation Act within the Workforce Investment Act as a bipartisan effort to strengthen employment opportunities, research, and independent living services and supports for individuals with disabilities.

Respectfully submitted,

Cindy A. Chapman

Ms. Cindy A. Chapman, CAE

Executive Director

Commission on Rehabilitation Counselor Certification

Attachment on Importance of CRC Certification