



June 12, 2015

Commissioner Janet LaBreck
U.S. Department of Education
400 Maryland Avenue SW, Room 5086
Potomac Center Plaza (PCP)
Washington, DC 20202-2800

Re: Docket ID ED-205-OSERS-0001

Dear Commissioner LaBreck:

We, the senior leadership for the Council on Rehabilitation Education (CORE) hereby respond to the Notice for Proposed Rulemaking proposing to amend the regulations governing the State Vocational Rehabilitation Services program, as amended by passage of the Workforce Innovation and Opportunity Act (WIOA) enacted on July 22, 2014. Our comments focus on 34 CFR §361.18, which provides guidance with respect to the Comprehensive System of Personnel Development (CSPD) regulations.

The Council on Rehabilitation Education (CORE) is the accreditation body for 98 graduate level Rehabilitation Counseling programs in the United States. There are currently 5,400 graduate students in our accredited programs and approximately 1600 Rehabilitation Counselors graduate each year and enter the workforce. Approximately 45% of our graduates each year begin employment in the State-Federal Vocational Rehabilitation program including the state agencies for the blind.

The Council on Rehabilitation Education (CORE) is the agency that accredits 98% of the universe of graduate programs in Rehabilitation Counseling (98 out of the 100 Rehabilitation Counseling programs are accredited by CORE). As the accrediting organization for Rehabilitation Counselors, CORE establishes the educational requirements for entry into the profession of Rehabilitation Counseling and, in doing so, plays a key role in establishing trust with and among the individuals with disabilities whom the graduates of our programs serve. The knowledge domains and skills required for the practice of rehabilitation counseling have a long history of being defined through research. CORE conducted the initial research that established the educational requirements between 1968-1970. The research was funded through a Rehabilitation Services Administration (RSA) grant awarded to the University of Wisconsin-Madison and was unique among educational standards development in that they involved people with disabilities in their development.

CORE began accrediting programs in 1971 and two-years later the Commission on Rehabilitation Counselor Certification (CRCC) began certifying the graduates of CORE programs. CORE reviews and revises its standards a minimum of once every five years and the revision is based on empirically based research that includes feedback from stakeholders, including CSAVR and individuals with disabilities. CRCC conducts periodic role and function studies. The results of these studies are used to revise the CRC exam and also used by CORE as evidence in its standards revision process. The empirical research conducted by CORE and CRCC is the underpinning that defines entry-level requirements for rehabilitation counselors at the master's level and examination requirements for the credentialing of rehabilitation counselors who provide vocational rehabilitation services to individuals with disabilities.

We note that WIOA maintains a requirement for the vocational rehabilitation portion of the Unified or Combined State Plans to include agency policy describing “standards that are consistent with any national or State approved or recognized certification, licensing, or registration requirements” (34 CFR §361.18, page 56) that apply to the area in which such personnel are providing vocational rehabilitation services. CORE standards prepare students to meet the minimum qualifications to sit for the Certified Rehabilitation Counselor (CRC) exam and CORE curriculum is recognized in the licensing laws for professional counselors in 13 states and the curriculum is consistent with educational requirements in the remaining 37 states, Puerto Rico and the District of Columbia.

CORE agrees with “the establishment and maintenance of education and experience requirements, to ensure that personnel have a 21st-century understanding of the evolving labor force and the needs of individuals with disabilities” (34 CFR §361.18, page 56). The proposed rules define the skills required to ensure this 21st-century understanding and include six areas of knowledge and skill. CORE supports these six areas as critical knowledge domains and you will find they closely mirror the knowledge domains required for accreditation as a Rehabilitation Counseling program by CORE (SEE Table 1). While we support the knowledge domains identified in 361.18, there is considerable depth to each domain with each domain typically being covered by a minimum of a 16-week course. The process of evaluating curriculum to ensure it contains the breadth and depth of knowledge to address each domain is arduous and consists of the use of content experts and a process that is recognized by the Council on Higher Education Accreditation (CHEA). The only body qualified to assess curriculum of this kind in Rehabilitation Counseling is CORE and we are concerned that the process of evaluating whether candidates have the knowledge and skills identified will be insufficient without including the process of accreditation.

Table 1: Comparison of the knowledge, skill and experience requirements outlined in 34 CFR §361.18 to the CORE knowledge domains used for accreditation of graduate programs in Rehabilitation Counseling.

Knowledge and Skill Requirements	CORE Knowledge Domain & Clinical Experience
A. Understanding the medical and psychosocial aspects of various disabilities	C.2 Psychosocial Aspects of Disability and Cultural Diversity C.9 Medical, Functional, and Environmental Aspects of Disability
B. Assessing an individual’s skills and abilities to obtain and retain competitive integrated employment and establishing a plan to meet the individual’s career goals	C.7 Assessment C.1 Professional Identity and Ethical Behavior C.3 Human Growth and Development C.8 Research and Program Evaluation
C. Counseling, case management, and advocacy to modify environmental and attitudinal barriers	C.5 Counseling Approaches and Principles C.10 Rehabilitation Services, Case Management, and Related Services C.6 Group Work and Family Dynamics
D. Understanding the effective utilization of rehabilitation technology	C.10 Rehabilitation Services, Case Management, and Related Services
E. Developing effective relationships with employers in the public and private sectors	C.4 Employment and Career Development
F. Delivering job development and job placement services that respond to today’s labor market	C.4 Employment and Career Development
Experience Requirements	D.1 100 hours of supervised experience working with people with disabilities D.2 600 hours of experience providing services to individuals with disabilities

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The Council on Rehabilitation Education (CORE) worked collaboratively with CSAVR to educate Senate HELP committee staff so WIOA regulations would require standards for vocational rehabilitation counselors that were consistent with national standards for the profession, a master's degree in Rehabilitation Counseling from a CORE accredited program, national CRC certification, and licensure as a professional counselor, where appropriate. We ask that you recognize **graduates from CORE accredited programs** as containing the knowledge, skill and experience requirements that are necessary to provide high-quality services to individuals with disabilities.

We appreciate your careful consideration of our recommendation as you finalize these rules. Please feel free to contact CORE's Executive Director, Dr. Frank Lane via telephone at 847.944.1345 or via email at flane@core-rehab.org if he can answer any questions or be of further assistance.

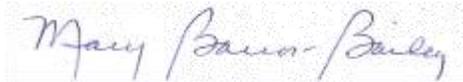
Sincerely,



Patricia Nunez, MA, CRC, CDMS, CCM
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