



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

April 26, 2007

Donna Nangle
U.S. Department of Education
400 Maryland Avenue, SW, Room 6030
Potomac Center Plaza
Washington, D.C. 20204-2700

Dear Ms. Nangle,

As Co-Chairs of the Consortium for Citizens with Disabilities' (CCD) Employment and Training Task Force, we are writing in response to the Notice of Proposed Priority for a RRTC on Vocational Rehabilitation that the Department of Education's Office of Special Education and Rehabilitative Services (OSERS) published in the Federal Register (Vol. 72, No. 58) on March 27, 2007. The Notice describes a proposed priority under the Disability and Rehabilitation Research Projects and Centers Program administered by the National Institute on Disability and Rehabilitation Research (NIDRR) to fund a Rehabilitation and Research Training Center (RRTC) intended to improve rehabilitation services and outcomes for individuals with disabilities.

CCD is a coalition of approximately 100 national disability organizations working together to advocate for national public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society.

Members of the Employment and Training Task Force would like to commend OSERS and NIDRR for proposing a priority for an RRTC on Vocational Rehabilitation (VR). With the employment rate of Americans with disabilities of working age in 2000 being 56 percent, there is still a need to focus significant resources on conducting advanced programs of research to identify the most promising service strategies for engaging and maintaining both youth and adults with disabilities in the competitive labor market.

As the background information notes, the employment picture for individuals with developmental disabilities, mental illness and other significant disabilities is bleak. CCD strongly supports the inclusion of subsection (d) increased knowledge of "best VR practices" for prioritizing and providing services to individuals with the most

significant disabilities and (e) increased knowledge of “best VR practices” for individuals with developmental disabilities and individuals with mental illness in the proposed priority. Highlighting these concerns in the proposed priority will encourage new research and strategies to address the low employment rates for these individuals.

However, research alone is an insufficient response to this circumstance. Information about promising practices in getting Americans with disabilities into competitive employment and the results of any research conducted must be disseminated widely throughout the VR service delivery system as well as to individuals with disabilities. The outcomes of this RRTC’s research should be strategically incorporated into vocational rehabilitation counselor preparatory and continuing education programs. Incentives for state and local VR operations should be offered and tied to the incorporation of the RRTC’s findings into service delivery as best practices. In order to maximize effectiveness, entities applying for this RRTC should have a well developed and thorough dissemination and direct program delivery impact strategy as a part of their proposals under section (f).

While supportive of the proposal to conduct research on the complex employment service delivery structures for individuals with disabilities, we feel that the Notice of Proposed Priority fails to identify some critical areas that should be included in such research and would like to take this opportunity to identify additional areas that should be spelled out in the final priority.

First and foremost, the Notice makes no specific mention of transition services. Although this is an area where VR agencies have traditionally been minimally involved, a number of State VR agencies have made great strides in this area in the past few years. Nevertheless, most VR agencies still require an eligibility determination prior to providing transition services to high school students. This approach to the provision of transition services requires significant financial and human resources.

A strong connection between high schools and VR agencies is a key factor in ensuring that government at all levels (Federal, state and local) will see a return on investment on the funds that are appropriated for special education. Transition programs must be strengthened and enhanced if they are to assist students with disabilities in reaching their potential to become productive and active members of their communities.

The following facts provide strong evidence of the need to focus research on how the VR service delivery system can best meet the needs of transition-age youth:

- According to the National Longitudinal Transition Study-2 (NLTS-2), 30 percent of special education students drop out of school prior to finishing high school. Dropout rates are particularly high among youth with emotional disturbances, other health impairments, and multiple disabilities;
- According to NLTS-2, the primary transition goal of 53 percent of youth with Individualized Education Programs (IEPs) is competitive employment;

- According to NLTS-2, among students with disabilities surveyed in 2002
 - 56% received no career counseling,
 - 51% received no career assessment,
 - 64% received no job readiness training,
 - 86% received no job skills training, and
 - 64% received no job search instruction;
- Youth with disabilities are much less likely than their peers without disabilities to participate in postsecondary education. According to NLTS-2
 - only 32% of youth with disabilities go on to any postsecondary education after leaving high school,
 - 21% of youth with disabilities enter two-year colleges,
 - Only 10% of youth with disabilities enter four-year colleges, and
 - 6% of youth with disabilities go in to some type of postsecondary vocational, technical or business school;
- Current special education students can expect to face much higher adult unemployment rates than their peers without disabilities; and,
- Young adults with disabilities are three times more likely to live in poverty as adults than their peers without disabilities.

The identification of effective and promising practices for ensuring that transition-age youth with disabilities have early access to comprehensive transition services, including access to both the expertise of VR counselors and the services available through VR, are critical in altering these trends. One area that needs to be closely examined is the failure of so many VR agencies to use the authority found under “services to groups” as a method of addressing the needs of transition-age youth (e.g., to explore vocational interests, to be exposed to different careers, to investigate various options for additional training and postsecondary education, etc.). Services to groups offers a strategy that can be both cost-effective and efficient in meeting the needs of transition-age youth prior to their being ready to apply for VR service and identify an employment outcome in their Individualized Plans for Employment. An examination of transition services also needs to look at how a state’s order of selection impacts the ability of high school students with disabilities to access VR services when they are ready to apply for services and declare their employment goals.

Secondly, the Employment and Training Task Force also recommends that the RRTC on VR be instructed to look at a variety of VR policies and service strategies that are not currently mentioned in the Notice of Proposed Priority:

- With regard to section (a), “a foundation of available knowledge about the VR programs characteristics and outcomes”, we recommend requiring the RRTC to explore how state procurement policies interact with the choice provisions spelled out in the Rehab Act.
- With regard to section (b), “increased knowledge about the broad constellation of Federal and State policies and programs”, we recommend requiring the RRTC to:

- examine the effectiveness of interagency agreements and how they can be strengthened;
 - explore different approaches for connecting to One-Stop Centers and how those connections might impact employment outcomes for VR consumers;
 - explore connections between State VR agencies and DOL's Veterans Employment and Training Programs and the Veterans Administration's Vocational Rehabilitation and Employment Program;
 - explore VR's connection to apprenticeship programs; and
 - research policies related to paying for postsecondary education (particularly how financial needs criteria are used) and try to determine if particular policies promote or impede participation in postsecondary education.
- With regard to section (c), "increased knowledge of the structure and operations of VR service delivery practices at the State level", we recommend replacing the term "home-based employment" with "self-employment and entrepreneurship, including home-based employment" as home-based employment is only one aspect of self-employment and entrepreneurship.

We also recommend requiring the RRTC under section (c) to examine:

- the use of extended evaluations and trial work experiences;
- the agreements and relationships state vocational rehabilitation agencies have with state developmental disability agencies for providing employment supports to people with developmental disabilities;
- the use of the authority spelled out in services to groups;
- how innovation and expansion grants are used;
- the characteristics including severity of disability of those denied vocational rehabilitation services because of a presumed inability to benefit from services or insufficient funding; and
- how the design and execution of different types of purchase of service agreements (e.g., third-party agreements, cash-match agreements, agreements that purchase slots in programs, agreements that pay for specific services, agreements that pay based on outcomes, etc.) impacts the achievement of employment outcomes.

Finally, we strongly encourage the Department to make this proposed priority an "Absolute Priority" when it is published to invite applications. This designation will ensure that the applications that are received will address all of the important areas that have been identified in the proposed priority and that have been suggested in the Task Force's comments.

The undersigned members of the Task Force would like to thank you for the opportunity to comment on this Notice of Proposed Priority and look forward to seeing the announcement of availability of funding that will address this priority.

Sincerely,

Cheryl Bates-Harris, National Disability Rights Network
Susan Prokop, Paralyzed Veterans of America
Celane McWhorter, APSE: The Network on Employment
Charles Harles, Inter-National Association of Business, Industry and Rehabilitation
Brad Turner-Little, Easter Seals, Inc.