

The Vision Rehabilitation Therapy Division of the Association for Education and Rehabilitation of the Blind and Visually Impaired is concerned about the restrictive nature of the limitations imposed under regulations of the Workforce Innovation and Opportunity Act (WIOA), specifically for the provision of Pre-Employment Transition Services and services under the Unpaid Family Worker/Homemaker status. These regulations limit the ability of blindness agencies to fully serve those whom the law was intended to address under the 15% reserve.

Limitations on Transportation:

Research has shown repeatedly, that transportation is vital to successful participation in both rehabilitation programs and employment and is a significant barrier, if not the leading barrier, to employment for persons with blindness or visual impairment. If blindness agencies were allowed to utilize the reserve for transportation as part of the cost of the provision of required services; it would allow for increased opportunity and participation by students with disabilities and potentially eligible students.

Limitations on Assistive Technology:

Under the current regulations, assistive devices and access technology are limited, in part due to the guidance that does not allow the purchase of laptops or personal computing devices. We as vision rehabilitation therapists and specialists in training persons with blindness or vision loss in the use of assistive device and access technology contend that this regulation should be lifted. Additionally, while assistive technology software and some devices are allowed, the computer to place the software on is not, which is limiting for clients found potentially eligible for Pre-employment transition services. Additionally, under workplace readiness training, access or assistive technology includes a wide range of skill development, but without the proper equipment, this cannot be provided. Moreover, as universal design has expanded opportunities, which may allow a student with a disability to utilize a device once properly activated, without the need of other costly software, personal computers should be considered an allowable expenditure. This is an effective use of both federal and state dollars to meet the client need.

Inclusion of Post-Secondary Education:

Given that counseling on opportunities for post-secondary education is a required area, this should be expanded to include the option to utilize the reserve to fund post-secondary opportunities, to include college expenses. Moreover, with the unemployment rate of persons with blindness or visual impairment at an estimated 70%, the provision of post-secondary education and training is both necessary and common among those we serve. Allowing for expenditure of the reserve in this area and expansion of services allowed under the regulations, would level the playing field not only for clients and their employment potential, but also for agencies in utilization of the reserve in a fiscally responsible manner that allow us to best meet the needs of our clients.

Unpaid Family Worker/Homemaker Status:

As Vision Rehabilitation Therapists, we contend that the Unpaid Family Worker/Homemaker status should be reinstated, as an allowable successful vocational rehabilitation case type and closure. This status allowed many individuals to be successful within the vocational rehabilitation system. Many of these clients would otherwise not meet the guidelines for competitive integrated employment for any number of reasons. The elimination of funding and

the Unpaid Family Worker/homemaker outcome for Vocational Rehabilitation clients is troublesome, as not every person seeking vocational rehabilitation services desires to be employment outside the home. For many clients, caring for their family is of the immediate priority. Furthermore, for those newly impacted by blindness or vision loss, performing routine tasks or caring for their children safely, independently, and self-reliantly, requires specialized training, which otherwise is likely not available to these clients through typical means.