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Re:   Comments and Recommendations for the U.S. Department of Education Regulatory Reform Task Force  
  
Thank you for the opportunity to provide comments and recommendations in response to the request for comments regarding regulations that are appropriate for repeal, replacement, or modification in accordance with Executive Order 13777.  
  
The National Rehabilitation Association (NRA), founded in 1925, is one of longest-established national membership organizations in the United States which advocates with and on behalf of all individuals with disabilities, specifically with regard to securing quality employment  
provided by qualified rehabilitation counselors.  
  
With Chapters in almost all States, the National Rehabilitation Association is comprised of qualified rehabilitation counselors, in both the public and private sectors, rehabilitation counseling educators, independent living specialists, students in rehabilitation  
counseling programs, OTs, PTs, Speech Therapists, and many others.  
  
The National Rehabilitation Association has three areas on which we would like to provide comments, which include Pre-Employment Transition Services to eligible students and other young adults with disabilities, Qualifications for Rehabilitation Counselors and Common  
Performance Measures.  
  
CFR 361.48  PRE-EMPLOYMENT TRANSITION SERVICES  
  
The National Rehabilitation Association strongly supports the addition of Pre-Employment Transition Services in Title I of the Rehabilitation Act of 1973, as amended.

We are concerned, however, with current and future legislation that could impact greatly the number of eligible students and other young adults; with disabilities who might not be able to access these long-overdue services because of Draconian cuts to Medicaid, to the Children's Health Insurance Program (CHIP) and other health care programs that provide health care to students and other young adults with disabilities.

While we fully appreciate that the U.S. Department of Education does not have jurisdiction over the U.S. Congress' legislation, we feel very strongly that drastic cuts to Medicaid, CHIP, and other health care programs which serve students and other young adults with disabilities should be taken into account should the number of students and young adults with disabilities accessing these important services not be fully realized.  
  
We appreciate your consideration of this important issue.  
  
QUALIFICATIONS FOR QUALIFIED REHABILITATION COUNSELORS  
  
Today, in America, we are experiencing an alarming increase in insufficient training of Americans across the employment spectrum.  
  
Qualified Rehabilitation Counselors, in both the public and private sectors, possess the specialized skills set to provide the individualized services and supports to all eligible individuals with disabilities, including those with multiple, significant disabilities.  
  
These specialized skills set include:  counseling and guidance; knowledge and appreciation of the medical and psychological aspects of disability, knowledge and implementation of vocational assessment strategies and application of transferable skills; working knowledge and integration of labor market data pertaining to individuals with disabilities; skills and abilities to match business workforce needs with the client's skills and talents; and providing services required to develop and implement the individualized career plan that enables the individual to successfully be employed.  
  
We respectfully request that the Rehabilitation Services Administration (RSA) in the U.S. Department of Education clarify the language in Title IV of the Workforce Innovation and Opportunity Act (WIOA) to reflect language that the inclusion of a business degree does not supplant the Master's Degree in Rehabilitation Counseling nor the highest standard in the State, but is merely supplemental to the list of degrees referenced in the Rehabilitation Act, as amended.  
  
Thank you for your consideration of this request.  
  
COMMON PERFORMANCE MEASURES  
  
The National Rehabilitation Association is pleased for the opportunity to comment on this important issue.  
  
While we appreciate the importance of being inclusive in the workforce community, we are concerned that some in the workforce community may not fully appreciate the many obstacles and barriers that individuals with disabilities, especially those with multiple, significant  
disabilities, encounter when entering the workforce.  
  
We appreciate the inclusion of an individualized indicator in the legislative language, which will certainly help, but remain concerned that, given these challenges and the need for ongoing, individualized services and supports, that outcomes may not be as robust as those who do not have disabilities.  
  
We know that this is the intent of the individualized indicator, but respectfully request that this consideration be amplified in the regulatory guidance, if possible, so that everyone will be fully aware of its intent.  
  
Thank you again for the opportunity to respond further to the U.S. Department of Education regarding regulations we feel are appropriate to be clarified.  
  
If you have any questions or comments, in accordance with Executive Order 13777, please do not hesitate to contact me.  
  
Respectfully submitted,  


Fredric K. Schroeder, Ph.D.  
Executive Director