The Association of Vision Rehabilitation Therapist is concerned about the limiting nature of the restrictions set forth under the regulations of the Workforce Innovation and opportunity Act (WIOA), specifically the services under the Homemaker/Unpaid Family Worker status and the provision of Pre-Employment Transition Services. These regulations limit the ability of blindness agencies and their Vision Rehabilitation Therapists and related staff to fully serve those whom the law was intended to address.

Homemaker/Unpaid Family Worker Status:

The Association of Vision Rehabilitation Therapists, contend that the Homemaker/Unpaid family worker 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 may not otherwise meet the guidelines for competitive integrated employment. The elimination of funding and the deletion of the homemaker/unpaid family worker outcome for Vocational Rehabilitation clients is troublesome, as not every person seeking VR services wishes to be employed outside the home. For many individuals, caring for family is valuable and is of immediate priority. Furthermore, for those newly impacted by blindness or vision loss, performing routine tasks safely, independently, and self-sufficiently, or caring for their children requires specialized training, which otherwise may not be available to these clients through typical means, especially given limited funding of other programs.

Limitations for Provision of Pre-Employment Transition Services:

Funding of Transportation:

Transportation is vital to successful participation in both rehabilitation programs and employment, and is among the leading barriers to employment for persons with blindness or visual impairment. If blindness agencies were allowed to utilize the 15% reserve for transportation as part of the cost of the provision of required services, this would allow for increased opportunity and participation by students with disabilities and potentially eligible clients.

Funding of 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 computers. We as vision rehabilitation therapists train persons with blindness or visual impairment in the use of assistive devices and access technology and we contend that this regulation should be lifted. Additionally, while assistive technology software and some devices are now allowed, the computer to place the software on is not. This is restrictive for clients found potentially eligible for services. Additionally, under workplace readiness training, assistive technology includes a wide range of skill development, but without proper equipment, this cannot be delivered. Moreover, universal design has expanded opportunities, which may allow a student with a disability to utilize a device without the need for other costly software, once properly set up. Given this, personal computers should be considered an allowable expenditure. This is an effective use of both federal and state dollars to meet the client needs.

Inclusion of Post-Secondary Education:

As counseling on opportunities for post-secondary education is required, this should be expanded to include the option to utilize the reserve to fund these post-secondary opportunities, to include college tuition and expenses. Furthermore, with the unemployment rate of persons with blindness or low vision at an estimated 70%, the provision of post-secondary education and training is both necessary and commonly among the highest cost for those we serve within this age range. Allowing for expenditure of the reserve in this area and expansion of services allowed under the regulations, would expand opportunities for clients and their employment potential, and also allow for greater flexibility within agencies in utilization of the reserve in a fiscally responsible manner that would allow us to best meet the needs of our clients.