

Vocational Rehabilitation Counseling Coalition

Amended – October 26, 2020

October 21, 2020

Dear CACREP Board of Directors,

The Vocational Rehabilitation Counseling Coalition (VRCC) is composed of nine professional organizations working together on issues vital to the rehabilitation counseling community and profession. The VRCC is the largest voice of rehabilitation counseling professionals in the United States. The purpose of the coalition is to ensure that people with disabilities have access to the best-qualified rehabilitation counseling professionals. Rehabilitation counseling professionals recognize and support the needs and rights of people living with disabilities; empowering them to navigate the challenges of achieving increased independence, community integration, and competitive employment.

These needs and rights include:

- People with disabilities should set and achieve their personal, career, and independent living goals. They are entitled to a self-sufficient, fully integrated life.
- Employment is an issue of justice and equality, autonomy, and of the civil right to participate fully in one's community and society; it is access.
- Employment is critical. The personal, social, economic, and health barriers faced by persons with disabilities can be reduced or ameliorated through participation in employment.
- Americans with disabilities experience exclusion from full community participation and are stalled in their upward mobility, which cause a lasting, negative impact on their physical well-being, psychosocial health, and quality of life (U.S. Senate Committee on Health, Education, Labor and Pensions [SCHELP], 2014).
- US Department of Labor data showed that approximately 80% of people with a disability remained outside the labor force compared with 30% of people without a disability, and this 80% had an unemployment rate more than double that of those without a disability (USDOL, 2019b).
- The COVID-19 crisis has highlighted the seriousness of the civil rights issues of access to employment and appropriate healthcare.

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This year the Vocational Rehabilitation program is celebrating 100 years of serving people with disabilities; no other counseling profession can lay claim to such history. Since the Federal Government established the program in 1920, the profession has expanded its expertise to cover a wide range of disabilities. This expansion arose out of the clients' self-advocacy, protests, and determination to have equal access to all aspects of their living, learning, and working environments.

We are writing concerning the current rehabilitation counselor curricular standards and the 2023/24 revision currently under way by the Council for the Accreditation of Counseling and Related Educational Programs (CACREP).

This issue has unprecedented importance to the current and future of the rehabilitation counseling profession. Our concern is based on four issues related to rehabilitation counseling's professional responsibility to people with disabilities as codified in federal law. Rehabilitation counseling, which has a long and rich history of serving people with disabilities. At the heart of our work is the philosophy of equal opportunity and justice for people with disabilities.

With this precedence in mind, the VRCC is requesting the following:

1. A clear presentation of all the knowledge and skill areas identified in the CRCC Role & Function Study across all rehabilitation counseling programs.

Rehabilitation counseling educational standards are based on an extensive body of knowledge that has been acquired through job analysis, role and function studies, analysis of professional competencies, and critical incident approaches (Chan et al., 2017; Leahy & Tansey, 2008). The specific competencies and job functions important to the practice of rehabilitation counseling and the achievement of positive outcomes for people with disabilities have been identified and defined (Leahy, Chan, & Saunders, 2003). The rehabilitation counseling curricular standards need to reflect the knowledge derived within a specialty over time and respect the ability to respond to stakeholder needs. For a comprehensive description of the knowledge areas, please see attached Exhibit A.

2. All rehabilitation counseling faculty members are held to the standard of acquiring and maintaining Certification from the Commission on Rehabilitation Counseling (CRC).

CRC certification for rehabilitation counseling professionals is the gold standard for those serving in both public and private sector settings. As such, it should be a requirement that those who are training rehabilitation counselors are also certified in the field, have had direct experience working with people with disabilities, and are equipped to prepare novice professionals to do the same.

Allowing professionals from areas such as Social Work, Educational Leadership, Mental Health, for example, to serve as educators in rehabilitation counseling programs often undermines the training of novice rehabilitation counseling professionals and weakens their preparation for working with people with disabilities.

3. Students enrolled in rehabilitation counseling programs be required to complete a 600-hour internship that requires 240 direct service hours with people with disabilities.

Americans with disabilities experience exclusion from full community participation and are stalled in their upward mobility, which cause a lasting, negative impact on their physical well-being, psychosocial health, and quality of life (U.S. Senate Committee on Health, Education, Labor and Pensions [SCHHELP], 2014). US Department of Labor data showed that approximately 80% of people with a disability remained outside the labor force compared with 30% of people without

a disability, and this 80% had an unemployment rate more than double that of those without a disability (USDOL, 2019b). This directly speaks to the need for Rehabilitation professionals to gain direct experience working with disability populations to ensure that they are fully equipped to effectively serve people with disabilities when they enter the field of Vocational Rehabilitation.

4. Students enrolled in rehabilitation counseling programs be required to complete a 600-hour internship under the direct supervision of a CRC.

Training under a Certified Rehabilitation Counselor enhances the performance of new professionals and allows them the opportunity to train with a professional in the field who has both the knowledge and experience to effectively prepare them for working with people with disabilities.

Among the different counseling disciplines, the Certified Rehabilitation Counselor (CRC) credentialing process is the oldest and most reputable certification mechanism in the United States. The application of scientific research to develop the test and item specifications has been the hallmark of the Certified Rehabilitation Counselor Examination. Rubin and colleagues (1984) conducted the first national role and function study of the CRC and provided the test specifications for refining the content of the certification examination and the item pool. Since 1985, the Commission on Rehabilitation Counselor Certification (CRCC) has been accredited by the National Commission for Certifying Agencies (NCCA) and has been conducting both role and function and knowledge validation studies regularly to ensure the relevance and validity of the Certified Rehabilitation Counselor Examination. Findings from these studies were also used by the Council on Rehabilitation Education (CORE) to develop curriculum standards for a master's program in Rehabilitation Counseling. With the merger of CORE and CACREP, the study of the CRC role and function becomes even more important for integrating rehabilitation counseling concepts in the CACREP curriculum standards for the rehabilitation counseling specialty area.

The responsibility of our profession is to ensure that we provide quality services to individuals with disabilities who are often marginalized and vulnerable. Rehabilitation counseling professionals and educators have an ethical obligation to ensure that future rehabilitation counseling professionals are well equipped to serve consumers with disabilities by requiring and ensuring that they meet the gold standard of the profession. It is with this in mind that we make this petition to CACREP.

The VRCC requests the opportunity to meet virtually with the CACREP Board of Directors to discuss the requests outlined in this letter and develop a plan of action that incorporates these requests into the CACREP Rehabilitation Counseling standards. We can make ourselves available the week of November 30th, 2020.

On behalf of the VRCC Members, we look forward to your response.

Sincerely,

David Rosenthal, Ph.D., CRC
President, NCRE

Pam Shlemon
Executive Director, CRCC

EXHIBIT A
Empirically Derived Test Specifications
for the Certified Rehabilitation Counselor

The Essential Competencies of Rehabilitation Counselors
As defined by the published 2018 Role & Function Study

The results of this study provide empirical support for the description of the knowledge base underlying the professional practice of rehabilitation counseling, and contribute further empirical evidence in relation to the content and construct validity of the knowledge domains. These studies and prior research have provided the discipline with consistent empirically based evidence of an established and mature discipline that is able to respond appropriately to the evolutionary demands and pressures of a dynamic human service field.

1. Professional orientation and ethical practice (9% of questions)

- Risk management and professional ethical standards for rehabilitation counselors
- Laws and public policy affecting individuals with disabilities
- Ethical decision-making models and processes
- Diversity and multicultural counseling issues
- Rehabilitation terminology and concepts
- Professional roles, functions, and relationships with other human service providers
- Credentialing issues related to the rehabilitation counseling profession
- Organizational structure of rehabilitation counseling practice settings (e.g., public, private-for-profit, and not-for-profit service delivery systems)
- Historical and philosophical foundations of rehabilitation counseling

2. Counseling theories, techniques, and evidence-based practice (16% of questions)

- Clinical problem-solving and critical-thinking skills
- Rehabilitation techniques for individuals with psychological disabilities
- Individual counseling practices and interventions
- Establishing and maintaining effective working alliances with the clients we serve
- Individual counseling theories
- Behavior and personality theory
- Substance use and treatment
- Counseling/training to help clients develop workplace socialization skills
- Motivational interviewing
- Treatment planning for clinical problems (e.g., depression and anxiety)
- Human growth and development
- Evidence-based psychosocial and vocational interventions in rehabilitation counseling practice
- Evidence-based psychiatric rehabilitation practices
- Evidence-based counseling/therapy for clients with PTSD
- Evidence-based counseling/therapy for clients with alcohol and other drug use problems
- Theories and techniques of clinical supervision
- Evidence-based practice and research utilization

3. Group and family counseling (3% of questions)

- Family counseling practices and interventions
- Family counseling theories
- Group counseling practices and interventions
- Group counseling theories

4. Crisis and trauma counseling and interventions (4% of questions)

- Assessment of client dangerousness and development of a safety plan
- Effective rehabilitation counseling services for individuals with polytrauma injuries
- Impact of crises, disasters, and other trauma-causing events on people with disabilities
- Use of principles of crisis intervention for people with disabilities during crises, disasters, and other trauma-causing events

- The emergency management system within rehabilitation agencies and in the community

5. Medical and psychosocial aspects of chronic illness and disability (11% of questions)

- The psychosocial and cultural impact of disability on the individual
- Medical aspects and implications of various disabilities
- Environmental and attitudinal barriers for individuals with disabilities
- Medical terminology
- Implications of medications as they apply to individuals with disabilities
- The psychosocial and cultural impact of disability on the family
- Individual and family adjustment to disability
- Human sexuality and disability issues

6. Assessment, occupational analysis, and service implementation (15% of questions)

- Vocational implications of functional limitations associated with disabilities
- The functional capacities of individuals with disabilities
- Interpretation of assessment results for rehabilitation planning purposes
- Occupational and labor market information
- The tests and evaluation techniques available for assessing clients' needs
- Ergonomics, job accommodations, and assistive technology
- Transferable skills analysis
- Job modification and restructuring techniques
- Job analysis
- Diagnostic and Statistical Manual of Mental Disorders (5th ed., DSM-5; American Psychiatric Association, 2013)
- Computer-based job matching systems
- Methods and techniques used to conduct labor market surveys

7. Career development and job placement (9% of questions)

- Career development and job placement strategies
- Job readiness including seeking and retention skills development
- School-to-work transition for students with disabilities
- Employer development for job placement
- Supported employment strategies and services
- Dual diagnosis and the workplace
- Theories of career development and work adjustment
- Work conditioning or work hardening resources and strategies
- Individual Placement and Support (IPS) model—evidence-based supported employment
- Social media as a networking tool

8. Demand-side employer engagement (6% of questions)

- Assisting employers with job accommodation issues for their employees with disabilities (e.g., assistive technology, workspace modifications)
- Consultation process with employers related to management of disability issues in the workplace
- Educating employers on disability-related issues (e.g., ADA, compliance, disability law)
- Human resource practices, diversity in the workplace, and workplace supports for people with disabilities
- Diversity training related to disability issues for employers
- Demand-side employment issues related to hiring, return to work, and retention
- Marketing strategies and techniques for rehabilitation services

9. Community resources and partnerships (9% of questions)

- The services available for a variety of rehabilitation populations, including persons with multiple disabilities
- Community resources and services for rehabilitation planning
- Social Security programs, benefits, work incentives, and disincentives
- Financial resources for rehabilitation services
- Programs and services for specialty populations (e.g., school-to-work transition, spinal cord injury, traumatic brain injury, mental health, developmental disability, substance abuse, corrections)

- Independent living services
- Financial literacy and benefits counseling and linkages to asset development resources
- Services available through client advocacy programs (e.g., Client Assistance Program [CAP], legal aid)
- Services available from one-stop career centers
- Life-care planning and life-care planning services

10. Case management (7% of questions)

- The case management process, including case finding, planning, service coordination, referral to and utilization of other disciplines, and client advocacy
- Case recording and documentation
- Negotiation, mediation, and conflict resolution strategies
- Principles of caseload management
- Techniques for working effectively in teams and across disciplines
- Advocacy processes needed to address institutional and social barriers that impede access, equity, and success for clients
- Techniques for working with individuals with limited English proficiency
- Principles, models, and documentation formats for biopsychosocial case conceptualization and treatment planning

11. Health care and disability management (5% of questions)

- Appropriate medical intervention resources
- Health care benefits and delivery systems
- Health promotion and wellness concepts and strategies for people with chronic illness and disability
- Insurance programs (e.g., Medicare, Medicaid, group and individual, short- and long-term disability, personal injury no-fault liability)
- Disability prevention and management strategies
- Workers' compensation laws and practices
- Managed care concepts

12. Research, methodology, and performance management (6% of questions)

- Program evaluation procedures for assessing the effectiveness of rehabilitation services and outcomes
- Rehabilitation research literature related to evidence-based practice
- Effective management of rehabilitation services and programs, including areas such as administration, finance, benefit systems, and accountability
- Psychometric concepts related to measurement (e.g., reliability, validity, standard error of measurement)
- Strategic planning techniques and budget planning
- Research methods and statistics
- Systematic review, meta-analysis
- Research databases (e.g., Cochrane Collaboration, PsyINFO, MEDLINE)
- Concepts and principles of organizational development and stakeholder management

EXHIBIT B References

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