



# COUNCIL OF STATE ADMINISTRATORS OF VOCATIONAL REHABILITATION

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SD-428 Dirksen Senate Office Building  
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Dear Senators:

On behalf of the CSAVR, the National Organization of State Directors of 80 State and Territorial Vocational Rehabilitation Agencies, serving over 1,000,000 people with disabilities annually and assisting nearly 200,000 in obtaining, retaining or advancing in employment, we submit the following comments to Title V (The Rehabilitation Act) of the Staff Discussion Draft on the Reauthorization of the Workforce Investment Act of 2011.

The CSAVR is pleased to see efforts to reauthorize The Rehabilitation Act. This Title of WIA drives the entire public vocational rehabilitation program. While we understand there are time restrictions beyond the control of the HELP Committee staff, the reality is that the time allotted to review and respond to such a comprehensive revision to Title V is impractical.

The CSAVR has serious concerns about a significant number of provisions in the draft. We have outlined our priority concerns on the attached comment form. In general, we see the language as being too prescriptive in the areas of reporting requirements, State Plan provisions, pre-employment transition services, transition services, 14(c) requirements, set-aside funds and the new provisions under Supported Employment.

We wish to applaud the HELP Committee staff for proposed languages that increase the engagement of business, the numerous references to competitive integrated employment, consideration for allowing American Indian VR programs to pursue program income from SSA, and support for the language that the DSU has responsibility and authority over the expenditure of VR funds. The CSAVR also endorses comments made on the Staff Discussion Draft submitted by the National Council of State Agencies for the Blind (NCSAB).

We look forward to working with you and your staffs to improve and refine the draft to ensure that we have legislation that benefits persons with disabilities seeking employment through the workforce development system.

Sincerely,

Stephen A. Wooderson, CEO  
Council of State Administrators of Vocational Rehabilitation

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