

MEMORANDUM

U.S. Department of Education
OSERS/Rehabilitation Services Administration
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INFORMATION MEMORANDUM
RSA-IM-99-30
DATE: July 15, 1999

TO : STATE VOCATIONAL REHABILITATION AGENCIES (GENERAL)
STATE VOCATIONAL REHABILITATION AGENCIES (BLIND)
PROTECTION & ADVOCACY OF INDIVIDUAL RIGHTS
CLIENT ASSISTANCE PROGRAMS
RSA TRAINING GRANTEES
AMERICAN INDIAN VOCATIONAL REHABILITATION PROGRAMS
RSA SENIOR MANAGEMENT TEAM

SUBJECT : Revisions in Comprehensive System of Personnel Development Requirements

The Comprehensive System of Personnel Development (CSPD) requires State agencies to develop a systematic approach to developing its human resources. Included in the provisions is a requirement to establish personnel standards for its professional and paraprofessional staff. Employed staff that does not meet the standard must receive supplemental training. Many States have adopted the degree standards of the Commission on Rehabilitation Counselor Certification (CRCC), which administers the Certified Rehabilitation Counselor (CRC) standards. Recent changes in the CRC standards provide a new alternative for rehabilitation counselor certification. The purpose of this memorandum is to explain this new alternative and how it affects States that have adopted the CRC degree standards for its counselors. This memorandum also provides a recently developed "Practical Guide" to assist States in meeting their CSPD requirements and identifies a service available through CRCC to help States assess the academic credentials of employed VR counselors.

CRCC has instituted a new category for certification – D-4. This change, established by CRCC in June of 1999, allows a person with a master's degree in any field to take the CRC examination provided they have certain graduate coursework. Category D-4 expires December 16, 2001. Many States chose the degree criteria of the CRC standard as their personnel standard for counselors. In those States, counselors who achieve the D-4 criteria by December 16, 2001 could be considered to have met the degree standard for the CRC.

The D-4 criteria appear below:

Category D.4

(This category will be phased out as of December 16, 2001.)

This category is for individuals who have a master's degree in a discipline other than counseling. For this degree to be considered a related degree, in addition to the master's degree, the individual will be required to document at least 18 credit hours of coursework at the master's level or above, acquired post-master's, in the core areas that follow:

Degree: Master's degree in any discipline. At least 18 credit hours specified as follows:

1. One graduate course with a primary focus on the Theories and Techniques of Counseling. (This is a basic requirement for future consideration of relatedness of degree.)

AND

2. Three graduate courses, each with a primary focus on one of the following areas:
 - a) Occupational Information
 - b) Job Development and Placement
 - c) Medical Aspects of Disabilities
 - d) Foundations of Rehabilitation
 - e) Psychological Aspects of Disabilities
 - f) Personal and Vocational Adjustment

AND

3. Two graduate courses, each with a primary focus on one of the following areas:
 - a) Assessment
 - b) Research Methodology
 - c) Vocational and Career Development
 - d) Community Resources
 - e) Case Management
 - f) Delivery of Rehabilitation Services

Granted By: A college or university accredited by a recognized regional accrediting body at the time the degree was conferred.

Internship Requirement: None

Employment Requirement: Thirty-six (36) months of acceptable employment experience including a minimum of twelve (12) months under the supervision of a CRC. If you have met the employment criteria, but lack supervision of employment by a CRC, you must complete a Provisional Contract.

We encourage those States that have adopted the CRC degree standards for their CSPD standards for counselors to review these criteria and their CSPD plans. Such States may wish to take advantage of this time-limited opportunity for bringing their employed counselors up to their CSPD standards. RSA

encourages such States to adopt the entire standard, which includes employment requirements in addition to degree and coursework requirements.

RSA is pleased to share a document entitled, “The Comprehensive System of Personnel Development – A Practical Guide.” This guide was developed by the prime study group of the 25th Institute on Rehabilitation Issues (IRI) as a part of the publication entitled, “Improving Employment Outcomes Through the Comprehensive System of personnel Development.” The “Practical Guide” provides a clear, easy to follow guide to the CSPD requirements. It includes a narrative description of the elements of a CSPD plan and a “CSPD checklist.” While originally intended to be released as a part of the IRI document, the IRI prime study group agreed to release it now in order to assist States in developing, refining or enhancing their CSPD plans.

Finally, RSA announces a new service available through the Commission on Rehabilitation Counselor Certification and Utah State University. The effort, partially funded through a grant by RSA, allows State agencies to request a review of transcripts of VR agency counselors to determine if they meet CRC degree requirements, and if not, what courses would be required to fulfill the requirements. This service should be of great benefit to those State agencies that have adopted the national CRC degree requirements, but are having difficulty determining if their counselors meet the requirements. This service is not for use by individual counselors. Requests must be made by the State agency, and arrangements to do so must be made with CRCC prior to submission of any material. To find out more about this service, State agencies may contact the CRCC at (847) 394-2104 Ext.121.

Questions regarding this Information Memorandum should be directed to the appropriate Regional Commissioner.

Fredric K. Schroeder, Ph.D.
Commissioner

Attachments

CC: Council of State Administrators of Vocational Rehabilitation
National Association of Protection and Advocacy Systems
National Council on Independent Living
Commission on Rehabilitation Counselor Certification
Utah State University, Department of Special Education and Rehabilitation

The Comprehensive System of Personnel Development

A Practical Guide

Developed by the IRI Prime Study Group on Improving Employment Outcomes through VR Counselors who Meet the CSPD Requirements

According to statute and regulations, the State must develop a CSPD). This system is intended to ensure an adequate supply of qualified rehabilitation personnel. State VR agencies must submit and update the CSPD attachment. Each attachment must include information on the following topics:

- ? **Data System** on Personnel and Personnel Development
- ? Plans for **Recruitment and Retention** of Qualified staff
- ? **Personnel Standards** to Assure Personnel are Adequately Prepared and Trained
- ? **Staff Development Plan**
- ? Personnel to Address **Individual Communication Needs**
- ? **Performance Evaluation System**
- ? **Coordination of the CSPD** with IDEA and Inservice Training
- ? Opportunity for **Review of Plan by SRC**

The details of each section are presented below. At the end of this appendix is a “CSPD Checklist” that summarizes the information that should be in a CSPD attachment.

DATA SYSTEM: The CSPD requires that State units maintain a data system on personnel needs and resources. Specifically, the data system must include:

- ? Personnel Data and Projections
 - o number of personnel in relation to number of clients served
 - o number of staff currently needed to meet customer need
 - o a five year projection of personnel needs
- ? Personnel Sources
 - o a list of higher education programs that train rehabilitation personnel
 - o the number of students enrolled in and the number graduating during the prior year from those programs by type of program

At a minimum, the State CSPD attachment must describe the development and maintenance of such a system. RSA encourages State VR agencies to include a summary of the data to assist in national planning efforts.

RECRUITMENT AND RETENTION: The CSPD also requires that state units have plans for recruitment and retention of qualified staff to address personnel needs. Specifically the plan must include coordination with:

- ? Institutions of Higher Education
- ? Professional Associations

These plans must include special efforts to recruit, prepare and retain:

- ? personnel from minority backgrounds
- ? individuals with disabilities

The State CSPD attachment must describe such plans.

PERSONNEL STANDARDS: State Units must establish personnel standards that assure personnel are adequately prepared and trained. The standards must be consistent -- the highest entry-level academic degree needed for any national or State-approved or -recognized certification, licensing, or registration specific to a profession. For rehabilitation counselors, this means that if State approved or recognized certification, licensing or registration requirements do exist within the State (such as licensing standards for rehabilitation counselors in the private sector or in other State agencies), then the State VR agency must base its personnel standards for counselors on one of the following:

- ? the highest entry-level degree needed under the existing State requirements;
- ? a degree that exceeds the degree needed under the existing State requirements; or
- ? the degree required for the national CRC requirement -- a master's degree in rehabilitation counseling or a closely related field

If there are no State-approved or -recognized certification, licensing or registration requirements for rehabilitation counselors, the State VR agency must base its personnel standards for counselors on:

- ? the degree needed to meet the national CRC requirements -- a master's degree in rehabilitation counseling or another master's degree that meets CRC specifications (see the CRC criteria at the end of this document); or
- ? new State certification, licensing or registration requirements for rehabilitation counselors developed by the appropriate certification, licensing, or registration body of the State.

New personnel: RSA expects new personnel hired by the State to meet the standard. However, if there are reasons why a State cannot hire at that level, they must present an acceptable justification, establish a baseline standard for such hires and develop plans that swiftly move such hires to the standard. States must also establish a strategy to move them to a position in which they would no longer need to hire below the standard.

Existing personnel: RSA expects existing personnel to be retrained to the standard. Staff who does not meet the standard must be under an approved state plan to achieve the standard.

While the statute requires standards for all professional and paraprofessional staff, RSA is focusing initial efforts on Rehabilitation Counselors. It is important to note that RSA's current position on who is considered to be a rehabilitation counselor is anyone who does one or more of the following:

- ? Makes an eligibility determination
- ? Approves an IPE and any amendments to the IPE
- ? Makes the determination as to who is an individual with a significant disability
- ? Makes the determination as to who is an individual with a most significant disability

- ? Makes the determination, in consultation with the individual, of ineligibility
- ? Makes the determination, in consultation with the individual, that the record of service of an individual who has achieved an employment outcome can be closed

The CSPD attachment must include the following:

- ? a statement of personnel standards for counselors that are based on the highest requirements in the State applicable to the particular profession, i.e., the highest entry-level academic degree needed for any national or State-approved or State-recognized certification, licensing, registration, or other comparable requirements
- ? an analysis of the extent to which its counselors do not meet the highest requirements in the State
- ? an identification and analysis of factors (such as shortages of qualified personnel, low pay scales, etc.) that may inhibit its ability to hire qualified staff
- ? short-term and long-term strategies for addressing these factors
- ? objectives and activities for getting all of its counselors to the level of the standard that moves the State effectively toward compliance with the CSPD requirements and will result in counselors meeting the necessary standard in a timely fashion
- ? a commitment of funds to support the CSPD plan
- ? an evaluation mechanism to determine whether the CSPD plan's objectives are being met
- ? evidence that the CSPD plan encourages retraining and hiring of staff from minority backgrounds and staff with disabilities

STAFF DEVELOPMENT: State units must develop plans for staff development to assure that existing staff receives adequate and ongoing training. The plan must be based on an assessment of the needs of the state unit, and must address the issues of retention of qualified staff, succession planning and leadership development and capacity building.

The CSPD places particular emphasis on staff training in the following areas:

- ? Assistive Technology
- ? Current Research
- ? 1998 Amendments to the Rehabilitation Act
- ? Workforce Investment Act
- ? Informed choice
- ? Culturally diverse populations

The State CSPD attachment must describe its system of staff development.

INDIVIDUAL COMMUNICATION NEEDS: State Units must hire and retain staff trained to communicate with diverse populations, or obtain the services necessary to do so. This includes communication in the following:

- ? Native languages
- ? Sign language and other alternative modes of communication

The CSPD attachment must describe its efforts in this area.

PERFORMANCE EVALUATION SYSTEM: The State must describe how the system for evaluating the performance of rehabilitation personnel in no way impedes the accomplishment of the purpose of the program.

COORDINATION OF THE CSPD: The law requires coordination among the CSPD, the State's in-service training program and IDEA. IDEA also requires coordination of the IDEA CSPD with the CSPD of State VR agencies. The CSPD attachment must describe its efforts in this area.

REVIEW OF PLAN BY SRC: Finally, the Act requires that the State Rehabilitation Council (SRC) have the opportunity to review and comment upon the State's CSPD. The State's CSPD attachment indicates that the SRC has been provided this opportunity.

The attached "CSPD Checklist" may help State agencies develop their CSPD. Technical assistance is available through the RSA regional offices.

Comprehensive System of Personnel Development (CSPD) ***Requirements Checklist for CSPD Plans***

(NOTE: “*” indicates items not required,
but requested by RSA for informational and planning purposes)

DATA SYSTEM:

? Yes ? No Does the attachment provide evidence that the State agency maintains a system to collect and analyze on an annual basis data on qualified personnel needs and personnel development, and does the system including the type of information below?

*Does the attachment identify the actual number of designated State unit personnel with respect to:

? Yes ? No type of position

? Yes ? No ratio of personnel to clients served

? Yes ? No current staffing requirements to meet the needs of the agency’s customers (RSA encourages inclusion of the actual number of **counselors** needed).

? Yes ? No projected requirements to meet the staffing needs of the agency’s customers for the next five years (RSA encourages inclusion of the actual number of **counselors** needed).

*Does the attachment identify:

? Yes ? No Institutions of higher education that train rehabilitation personnel?

? Yes ? No number of students graduating from those institutions by type of program? (RSA encourages the inclusion of the actual number of **counselors** graduating).

RECRUITMENT AND RETENTION

? Yes ? No Does the attachment present a plan to address the current and projected needs for qualified personnel, including the coordination and facilitation of efforts with institutions of higher education and professional associations, to recruit, prepare and retain qualified personnel, including personnel from minority backgrounds and personnel who are individuals with disabilities.

? Yes ? No Does the attachment describe a plan to recruit and retain qualified staff?

Does this plan include efforts to recruit, prepare and retain personnel:

? Yes ? No from minority backgrounds

? Yes ? No who are individuals with disabilities

PERSONNEL STANDARDS

? Yes ? No Does the attachment provide evidence of establishment and maintenance of personnel standards meeting the requirements of 34 CFR 361.18(c) to ensure that professional and paraprofessional personnel needed within the designated State unit to carry out the vocational rehabilitation program are appropriately and adequately prepared and trained?

? Yes ? No Are the academic degree standards for vocational rehabilitation counselors and other professionals employed by the designated State unit clearly identified?

? Yes ? No Are the academic degree standards, particularly for vocational rehabilitation counselors, based on the highest requirements in the State applicable to the particular

profession, i.e., the highest entry-level academic degree needed for any national or State-approved or State-recognized certification, licensing, registration, or other comparable requirements?

Does the attachment include the following:

- ? Yes ? No The number of staff, particularly vocational rehabilitation counselors, who either meet or do not meet the highest requirements in the State applicable to the particular profession?
- ? Yes ? No Factors, such as pay scales or qualified personnel shortages, which adversely affect the ability to hire qualified staff, and a strategy to address such barriers?
- ? Yes ? No Short-term and long-term strategies including activities, objectives and time lines to assist personnel, particularly vocational rehabilitation counselors, to meet the required standards in a reasonably timely manner?
- ? Yes ? No Funding support for the implementation of a retraining plan to assist personnel, particularly vocational rehabilitation counselors, to meet the highest requirements in the State applicable to a particular profession (RSA encourages inclusion of the amount and source of such funds)?
- ? Yes ? No An evaluation strategy for the planned recruitment and retraining efforts to ensure that all personnel, particularly vocational rehabilitation counselors, meet the highest requirements in the State applicable to a particular profession?

STAFF DEVELOPMENT

? Yes ? No Does the attachment include a systematic plan for providing adequate and ongoing training to all staff?

Does the plan address the following areas?

- ? Yes ? No retention of qualified personnel
- ? Yes ? No succession planning
- ? Yes ? No leadership development and capacity building

? Yes ? No Is there an indication that the staff development plan was this based on a needs assessment?

Does the staff development plan indicate training in any of the following areas (the regulations emphasize but do not require these areas)?

- ? Yes ? No Assistive Technology
- ? Yes ? No Current Research
- ? Yes ? No The 1998 Amendments to the Rehabilitation Act
- ? Yes ? No The Workforce Investment Act
- ? Yes ? No Informed Choice
- ? Yes ? No Culturally diverse populations

COMMUNICATION WITH DIVERSE POPULATIONS

Does the attachment address the availability of staff or obtaining services necessary to communicate with clients;

? Yes ? No In their native language

? Yes ? No In sign language?

PERFORMANCE EVALUATION SYSTEM:

? Yes ? No Does the State must describe a system for evaluating the performance of rehabilitation personnel that in no way impedes the accomplishment of the purpose of the program?

COORDINATION OF THE CSPD and INSERVICE TRAINING

? Yes ? No Does the attachment indicate coordination with the CSPD under IDEA?

? Yes ? No Does the plan directly link the inservice training grant of the state agency, and inservice training funds with the various components of the CSPD?

STATE REHABILITATION COUNCIL

? Yes ? No Does the attachment indicate that the state rehabilitation council has had an opportunity to review and comment upon the development of the attachment and related policies and procedures?