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February 25, 2015

Commissioner Janet LaBreck
Rehabilitation Services Administration
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2800

Dear Commissioner LaBreck:

The undersigned organizations are joining to urge that regulations developed to implement the Workforce Innovation and Opportunity Act (WIOA) clarify the skill set that vocational rehabilitation counselors need to have to meet the complex and diverse employment needs of individuals with disabilities, including people living with HIV. The National HIV/AIDS Strategy (NHAS) includes a number of employment-related provisions to help achieve the three primary goals of the NHAS: 1) increase access to care and improve health outcomes for people living with HIV, 2) reduce new HIV infections, and 3) reduce HIV-related health disparities.

The state-federal vocational rehabilitation services system is the most comprehensive employment resource for individuals with disabilities, including people living with HIV. To adequately address the complex and interconnected needs of this population, we believe that vocational rehabilitation (VR) counselors need to be appropriately trained and credentialed.

Therefore, we request that the WIOA regulations specifically require that all vocational rehabilitation counselors have the skill set identified by the Council of State Administrators of Vocational Rehabilitation (CSAVR) in the CSPD comments they submitted for consideration for the federal regulations: (a) knowledge of the medical and psychological aspects of disability, (b) knowledge and implementation of vocational assessment strategies, (c) a working knowledge of the labor market and, d) competence in counseling and guidance, and providing the services required to develop and implement the individualized career plan that enables the person to be successfully employed in a competitive, integrated work environment.

In the states where hiring efforts fail to identify an individual qualified at the Master’s level, clearly the skill set identified by the CSAVR should be the preferred standard that a qualified VR counselor should meet. We continue to

believe the ideal standard for qualified VR counselors is the attainment of a Master's degree and the ability to sit for the Certified Rehabilitation Counselor (CRC) exam, as was defined in the Rehabilitation Act prior to the passage of the WIOA. This level of knowledge and expertise has been found to be most effective in achieving successful employment outcomes for individuals with disabilities, including people living with HIV. We were extremely concerned when these standards were downgraded in the WIOA.

The training that qualified VR counselors receive includes a focus on the impact of stigma and financial/benefits issues along with key medical and psychosocial concerns that impact the economic well-being and health of many individuals with disabilities, including people living with HIV. Research findings indicate that use of VR services by people living with HIV increases the chances of successful employment among those who use these services, and of achieving the primary goals of the National HIV/AIDS Strategy. Access to income supports and quality vocational rehabilitation services that can help improve the economic well-being of people with HIV are essential to these goals. To achieve this end, the NHAS Federal Implementation Plan specifically directs federal agencies to "consider ways to increase supports for employers to hire and maintain employment of people with HIV and how to integrate them in broader employment initiatives for people with disabilities" and to "develop a joint initiative to consider ways to help individuals living with HIV access income supports, including job skills and employment."

In summary, in light of the important role that vocational rehabilitation services can play in addressing the goals of the National HIV/AIDS Strategy and in increasing access to income supports and job training, we urge you to ensure that the WIOA regulations state the requirement that vocational rehabilitation counselors are adequately trained to address the complex vocational development and employment needs of individuals with disabilities, including people living with HIV. It is imperative that these regulations clearly require that vocational rehabilitation counselors demonstrate the skill set that is known to lead to improved employment outcomes for people with disabilities.

Sincerely,

30 for 30 Campaign

ActionAIDS, Philadelphia, PA

ADAP Advocacy Association (aaa+), Washington, DC

AIDS Action Baltimore, Inc., Baltimore, MD

AIDS Alabama, Birmingham, AL

AIDS Connecticut, Hartford, CT

AIDS Foundation of Chicago, Chicago, IL

AIDS Legal Council of Chicago, Chicago, IL

AIDS Project Los Angeles, Los Angeles, CA

AIDS Resource Center Ohio

AIDS United, Washington, DC

The Albany & Schenectady Damien Centers, Albany & Schenectady, NY

Alexian Brothers Housing and Health Alliance, Chicago, IL
The Alpha Workshops, New York, NY
American Sexual Health Association, Research Triangle Park, NC
APLA Health & Wellness, Los Angeles, CA
ASCNYC, New York, NY
BOOM!Health, Bronx, NY
Boulder County AIDS Project, Boulder, CO
Cascade AIDS Project, Portland, OR
Catholic Charities Community Services of Rochester, Rochester, NY
The Center for Black Equity-Baltimore, Baltimore, MD
The Center for HIV Law & Policy, New York, NY
The Center for Independence of the Disabled, NY, Kew Gardens, NY
CenterLink: The Community of LGBT Centers
Chicago House and Social Service Agency, Chicago, IL
CHOICES. Memphis Center for Reproductive Health, Memphis, TN
Christie's Place, San Diego, CA
Coalition of HIV/AIDS Nonprofits and Governmental Entities (CHANGE), New Orleans, LA
Collaborative Solutions, Inc., Birmingham, AL
Colorado Organizations Responding to AIDS (CORA)
Community Access National Network (CANN), Washington, DC
Community Access Services, Buffalo, NY
Community Servings, Boston, MA
Desiree Alliance-USA
Family and Medical Counseling Service, Inc., Washington, DC
Federation of Protestant Welfare Agencies, New York, NY
Friends For Life, Memphis, TN
Gay Men's Health Crisis (GMHC), New York, NY
The Global Network of People Living with HIV, North America (GNP+NA)
The G.R.E.E.N. Foundation, Santa Ana, CA
HealthHIV, Washington, DC
HIPAtlanta, Atlanta, GA
HIV Alliance, Eugene, OR
HIV Arkansas, Fayetteville, AR
HIV Prevention Justice Alliance, Chicago, IL
Housing Works, Brooklyn, NY
Howard Brown Health Center, Chicago, IL
I'm Still Josh - <http://imstilljosh.com>
International AIDS Empowerment, Las Cruces, NM; El Paso, TX
International Community of Women Living with HIV-North America (ICW-NA)
Iowa Unitarian Universalist Advocacy/Witness Network
Iris House, New York, NY
Knew Choices, Inc., Cartersville, GA
Latino Commission on AIDS, New York, NY
Legal Action Center, New York, NY

The Lesbian, Gay, Bisexual & Transgender Community Center, New York, NY
Life Linc Baltimore, Baltimore, MD
Lifelong, Seattle, WA
The Living Affected Corporation, Little Rock, AR
Louisiana AIDS Advocacy Network
Love Alive International Foundation of New York City, New York, NY
Love Alive International Sanctuary of Praise Worship Center, New York, NY
Making A Way Housing, Inc., Atlanta, GA
Moveable Feast, Baltimore, MD
Nashville CARES, Nashville, TN
National AIDS Housing Coalition, Washington, DC
National Alliance of State & Territorial AIDS Directors (NASTAD), Washington, DC
National Business & Disability Council (NBDC) at The Viscardi Center, New York, NY
National Center for Lesbian Rights, Washington, DC
National Council on Rehabilitation Education
National Coalition for LGBT Health, Washington, DC
National Minority AIDS Council, Washington, DC
National Women and AIDS Collective, Washington, DC
National Working Positive Coalition
New York City Faith in Action, New York, NY
New York HIV Employment Network
Okaloosa AIDS Support and Informational Services, Inc. (OASIS), Ft. Walton Beach, FL
Ohio AIDS Coalition
One in Four Chronic Health, Portland, OR
Pediatric AIDS Chicago Prevention Initiative (PACPI), Chicago, IL
Philadelphia Center, Shreveport, LA
Positive Opportunities, Inc., Harrisburg, PA
Positive Resource Center, San Francisco, CA
Positive Women's Network-Colorado
Positive Women's Network – USA, Oakland, CA
Pozitively Healthy, Washington, DC
Poz Vets USA-INTL, Atlanta, GA
Professional Association of Social Workers in HIV/AIDS, Birmingham, AL
Project Angel Food, Los Angeles, CA
Project Inform, San Francisco, CA
Ribbon Consulting Group, Washington, DC
The San Francisco EMA HIV Health Services Planning Council, San Francisco, CA
The San Francisco Mayor's Disability Council, San Francisco, CA
Sero Project, Milford, PA
SisterLove, Inc., Atlanta, GA
Southern HIV/AIDS Strategy Initiative (SASI), Durham, NC
START at Westminster, Westminster Presbyterian Church, Washington, DC
Street Works, Nashville, TN
Thresholds, Chicago, IL

TILTT, Inc. (Transgender Individuals Living Their Truth, Inc.), Atlanta, GA
Transgender Law Center, Oakland, CA
Treatment Access Expansion Project, Boston, MA
Treatment Action Group, New York, NY
Unity Fellowship Church NYC, Harlem, NY
US PLHIV Caucus
VillageCare, New York, NY
Virage Community Services, New Orleans, LA
VOCAL-NY, Brooklyn, NY
Watchful Eye, Brooklyn, New York
Wateree AIDS Task Force, Sumter, SC
Women Organized to Respond to Life-threatening Diseases (WORLD), Oakland, CA
The World Foundation for Medical Research and Prevention, Houston, TX
World Institute on Disability, Berkeley, CA