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The Client Assistance Program (CAP) and the Wisconsin Rehabilitation Council (WRC) gave public comment on the Reauthorization of the Rehabilitation Act. Our comments are listed below. Congress will reauthorize the law next year. You can send your comments, by June 30, 2002 to the Rehabilitation Services Administration rehab.reauth@ed.gov.

Public Comment on Reauthorization of the Rehabilitation Act of 1973, as Amended

The Rehabilitation Act is a remarkable law. Our recommendations are never meant to diminish its strengths, but to improve on them, so the law will continue to adapt to the needs of the people it serves. Our recommendations focus on Title I.

Required Rehabilitation Background for Future VR State Administrators:

1. The law needs to set requirements for the qualifications of VR Administrators. The federal government invests a great deal to assist states to provide employment services for people with disabilities. It should require that states select or appoint an administrator that understands the law. Our state recently chose its first Administrator with extensive education and experience in vocational rehabilitation. The rapid improvements in the VR agency have exceeded our expectations. The next governor's election could end that. People with disabilities deserve better.

Self-Employment:

2. Under the services a VR agency can provide for self-employment, we believe the law must stress what VR can do, such as credit counseling, start-up funds to leverage loans from lending institutions, and the use of qualified business consultants. If VR agencies are able to limit the initial services for self-employment plans, it will simply limit or eliminate that option for consumers.

Title I dollars should not fund Post Secondary Accommodations:

3. Title I should specify that VR dollars should not be used to fund the accommodation responsibilities of other public entities, such as colleges. The VR agency and its federal funds should serve individuals, not public systems. Funding post-secondary accommodations reduces the case service funds available for direct services, which creates waiting lists. The Rehabilitation Act should not wait for public entities to decide to do what is right. It needs to lead by example.

VR, CAP, and SRC need to focus on TANF recipients with disabilities:

4. Title I needs to direct VR agencies, Client Assistance Programs, and State Rehabilitation Councils to designate TANF recipients with disabilities as unserved or underserved. VR agencies should be directed to partner with their state TANF agency, as they are directed to partner with schools. Client Assistance Programs should be directed to do outreach to TANF

recipients and agencies, as we do outreach to minority groups. The State Rehabilitation Council should be directed to have a member from a TANF agency and a consumer on the council.

CAP reporting should reflect who is served and why:

5. Title I section on the Client Assistance Program needs to be revised to direct CAPs to measure and report information that is relevant to Congress, to RSA, and to each state agency. CAP should be a barometer to measure the issues that most frequently lead to conflict. By collecting this type of data, a state can evaluate its internal issues and RSA and Congress can address systemic ones. CAPs should be directed to report on the types of individuals (high school student, college student, injured worker, TANF recipient, farmer) and the type of service that is in dispute (self-employment, rehabilitation technology, college).

CAP should also report on the number of individuals CAP cannot help to resolve their conflict with VR because of the barriers of another system, such as Social Security or long term supports for supported employment candidates.

Identify Disincentives, Measure the Impact, Partner with Consumers to get them changed:

6. CAP and our Council believe it is imperative that this Reauthorization of the Rehabilitation Act acknowledges the presence of disincentives in other federal programs, inform consumers about disincentives the VR agency cannot overcome, and measure the impact. The VR agency has been characterized as the villain of underemployment for people with disabilities. When consumers understand which government system is keeping them from maximizing their employment goals, consumers can take appropriate action.

Our silence has allowed consumers to hate VR for things that are beyond its control. It has caused state agencies to avoid serving people with the most significant disabilities because they know the disincentives will reduce their closure numbers. It has caused individuals on SSI or SSDI to avoid employment programs, regardless of Tickets in the mail. RSA needs to direct VR agencies to empower consumers with knowledge and become a partner to measure and address the disincentives.

VR agencies need to be directed to empower consumers with information about disincentives. The government agency that owns the disincentive needs to be identified. VR agencies need to track data on how the disincentives block good employment outcomes for their active consumers and for the consumers who chose to close their case once the disincentives are identified.

Our council is interested in a system that will make work pay. We have encouraged our VR agency to make every positive, consumer oriented change it can make. The barriers of Social Security, health care coverage, personal care funding, and housing assistance stand like mountains in front of us. It is time for a partnership of VR and consumers to get the other systems changed.

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