

COUNCIL OF STATE ADMINISTRATORS OF VOCATIONAL REHABILITATION

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February 14, 2013

Congressman George Miller, Ranking Member U.S. Committee on Education and the Workforce 2181 Rayburn House Office Building Washington, DC 20515

Dear Congressman Miller:

On behalf of the Council of State Administrators of Vocational Rehabilitation (CSAVR), we extend our deepest gratitude to you for acknowledging the importance of introducing The Workforce Investment Act of 2013, including Title IV, The Rehabilitation Act of 1973, as Amended. We trust that the introduction of this legislation will begin a dialogue on the critical need to strengthen the workforce system by reauthorizing this long awaited legislation.

In a preliminary review of Title IV of the Workforce Investment Act of 2013, we have found a number of Sections with which we wholeheartedly agree, such as maintaining the Commissioner's position as a Presidential appointment with Senate confirmation, maintaining line item funding for Supported Employment, Migrant and Seasonal Farmworkers and Recreation, and acknowledging business as a customer of the VR system as well as the individual with a disability.

We also find a number of Sections in Title IV about which we have guestions, related to the prescriptive nature of transition services, the performance accountability system and the recognition of customized employment as a standalone service, to name a few.

In an overview of Title 1 of this legislation there are a number of Sections about which we have questions, in an effort to ensure we are correctly interpreting your intent on Workforce Board membership, infrastructure funding and the performance accountability system.

Also in a review of the GAO report referenced in the Bill entitled Multiple Employment and Training Programs – Providing Information on Co-locating Services and Consolidating Administrative Structures to Promote Efficiencies, the report acknowledges Vocational Rehabilitation as one of the more efficient and collaborative of the Federal Job Training Programs and does not name VR among those programs for which integration or consolidation into the larger workforce system could be considered. We would like more clarity in the Bill in Section 137 related to this.

We have always appreciated the willingness of your staff to listen to the issues and concerns of the VR community and trust we will have the opportunity to further discuss this legislation with you as we pursue the opportunity for our community to fully unite around the support and passage of The Workforce Investment Act of 2013.

Respectfully Submitted,

Stephen A. Wooderson, CEO

CSAVR