



December 31, 2021

Dear CACREP Standard Revision Committee:

This letter serves as the Commission on Rehabilitation Counselor Certification's (CRCC) public comments on DRAFT 2 of the CACREP 2024 Standards.

CRCC recently completed its Job Task Analysis (JTA) also known as the Role and Function Study. The article summarizing the findings will be published in the 2nd quarter of 2022.

The JTA serves as a "blueprint" for the content (educational/performance domains) of the Certified Rehabilitation Counselor (CRC) examination. The JTA was created to define the current knowledge, skills, and abilities (KSAs) that must be demonstrated by CRC professionals providing rehabilitation counseling services effectively and successfully. KSAs are validated according to their frequency of use and importance.

For purposes of the CACREP Standard Revision, I am including a copy of the final CRCC 2022 CRC Domain Blueprint derived from the JTA.

The CRC is the only national accredited counselor certification. CRCC has been accredited by the Institute for Credentialing Excellence (ICE)/National Commission for Credentialing Agencies (NCCA) since 1983. As an accredited certification organization, we must regularly seek to define roles and functions of our representative professions using the evidence-based literature as well as knowledge from those in practice to identify what the current roles and functions are and then give guidance to the construction or revision of the Body of Knowledge used to educate rehabilitation counselors. In fact, the establishment of a valid job analysis is essential to the integrity of a credentialing program and its associated exam. The job analysis translates the knowledge, skills, and abilities of career practice into a usable format for test development and delineates the important tasks and knowledge deemed necessary for competent practice. The job analysis helps ensure the CRC Certification Exam is both job-related and has content validity. The JTA is the tool that links the content of the certification exam to field-identified important job tasks and is an essential component in establishing the content validity of a credentialing exam. The final product, the CRCC Domain Blueprint becomes the framework to ensure quality outcomes for individuals and their families and data driven outcomes for the employers. Effective decision-making processes are integral to successful outcomes.

The final "blueprint" should be the guiding document used by CACREP to develop competency-based clinical rehabilitation counseling educational standards.

CRCC 2022 Domain Blueprint compared to CACREP Draft 2 - 2024 Standards

CRCC has taken several steps to outline the educational gaps between CACREP's Draft 2 - 2024 Standards and the 2022 CRC Domain Blueprint. Ninety-six percent (96%) of the new CRC domains remain consistent with the 2016 CRC Role & Function Study, which you have been previously provided.

Step 1: CRCC surveyed educators to identify how they are teaching to the 2016 Role & Function study vs. the CACREP Standards.

Many faculty shared concerns that CACREP standards have omitted disability concepts from rehabilitation counseling programs. They also reported that they are not integrating many of the CRC domains in their courses because they are following CACREP Standards

Quote from a former board member of CACREP

“Currently Rehabilitation Counseling degree programs are accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP) after the Council on Rehabilitation Education (CORE) merged with CACREP in 2017. At that time, all CORE accredited programs and standards were “ported over” and accredited by CACREP. Presently there are two types of specialty accreditation available to rehabilitation counseling and students and programs that emphasize differing emphases, scopes of practice and strengths of the field; Rehabilitation Counseling (emphasizing the historically traditional vocational and rehabilitation counseling practices; and Clinical Rehabilitation Counseling (emphasizing the working with persons with primary or co-occurring mental health disabilities and mental health interventions relevant to them).”

This statement represents what is happening to the rehabilitation programs and how CACREP standards continue to dilute the focus of rehabilitation and disability counseling programs.

Step 2: CRCC analyzed data of eleven (11) CRC exams over four (4) years to determine trends, specifically where students pass rates declined. The data below represents where rehabilitation educational programs report shifting their course work to align with the CACREP standards causing very low pass rates in the domains noted below.

We recommend: CACREP include in their standard that rehabilitation programs must cover key standards/domains specific to disability.

- Exam trends:
 - Each exam covers 12 domains and has two sections - Counseling and Rehabilitation & Disability.

COUNSELING SECTION OF THE CRC EXAM:

- Counseling Theories & Techniques, and Evidence-Based Practice
- Crisis and Trauma Counseling and Interventions
- Assessment/Evaluation, Occupational Analysis and Service Implementation
- Case Management

REHABILITATION & DISABILITY SECTION OF THE CRC EXAM:

- Professional Orientation and Ethical Practice
- Medical and Psychosocial Aspects of Chronic Illness and Disability
- Assessment/Evaluation, Occupational Analysis and Service Implementation
- Career Development and Job Placement

- Business Engagement
- Community Resources and Partnerships
- Case Management
- Health Care and Disability Management

Step 3: During the past two months CRCC and several subject matter experts (SMEs) completed a cross walk of the current 2022 CRC Domain Blueprint and CACREP’s Draft 2 – 2024 Standards. The gaps we found are consistent with the failure rate of students noted above and areas that faculty are not covering based on CACREP’s standards.

After a thorough review, CRCC’s position remains the same. CACREP has modified the current standards and specialty areas and created one standard now called “*Foundational Counseling Curriculum.*” While many of the Foundational Counseling Curriculum Standards overlap different counseling professions, there are several that should remain specific to the counseling specialty, or at the very least repeat in the specialty area with defined content curriculum. Below we have highlighted those areas along with areas left out of the standards which are specific to Rehabilitation Counseling.

Below is the CRCC 2022 Domain Blueprint.

CRCC is requesting the highlighted domains areas to be added to the Clinical Rehabilitation Counseling & Rehabilitation Counseling Program specialty standards. The domain’s below are not to be incorporated under the Foundational Counseling Standards as these are specific to CRCC’s JTA and reflect the work of the rehabilitation counselor.

1. Professional Orientation and Ethical Practice	10.7%
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A. Uphold professional ethical standards for rehabilitation counselors and manage risk.

[Counseling section of the exam]

- Conceptualize and articulate the counseling relationship
- Adhere to and ensure confidentiality, privileged communication, and privacy
- Understand how to promote and participate in advocacy and ensure accessibility
- Maintain professional roles to ensure appropriate service provision
- Maintain appropriate relationships with other professionals
- Understand the differing professional relationships in forensic and indirect services
- Understand the ethical requirements of evaluation, assessment, and interpretation
- Understand the ethical requirements in the roles of teaching, supervising, and training
- Understand the ethical implications of research and publication
- Understand the limits and ethical implications of the use of technology and distance counseling
- Understand and ensure appropriate business practices
- Understand and apply ethical decision-making models and processes.

B. Understand and apply laws and public policy affecting individuals with disabilities.

[Rehabilitation section of the exam]

- a) Summarize and synthesize the impacts of the Rehabilitation Act of 1973.
- b) Summarize and synthesize the impacts of Title V of the Rehabilitation Act of 1973 – Sections 501-504.
- c) Summarize and synthesize the impacts of the Rehabilitation Act of 1973, as Amended.
- d) Understand the impact of SSI/SSDI on employment, independent living, and economic self-sufficiency.
- e) Understand the impact of veteran benefits (e.g., service-connected disability compensation and non-service-connected pension) on employment, independent living and economic self-sufficiency. **NEW IN CRCC 2022 BLUEPRINT**
- f) Summarize and synthesize the impacts of the Fair Labor Standards Act.
- g) Understand the definition of a disability in ADA, the uses of the definition, and how the definition relates to the rights guaranteed by the ADA.
- h) Understand the rights guaranteed by the ADA in an employment setting.
- i) Understand the definition of a reasonable accommodation as defined by the ADA.
- j) Understand the rights guaranteed by the ADA on public transportation.
- k) Understand the changes to the definition of disability in the ADAAA, the changes to the interactive process, and the implications for employees and employers. **NEW IN CRCC 2022 BLUEPRINT**
- l) Understand the role of the EEOC in relation to discrimination.
- m) Summarize and synthesize the impacts of IDEA.
- n) Summarize and synthesize the historical impacts of WIA.
- o) Understand the rights and limits guaranteed by FMLA.
- p) Understand the confidentiality and technology requirements of HIPAA.
- q) Understand the impact of TWWIA (Ticket to Work) on employment, independent living, and economic self-sufficiency.
- r) Understand the impact and implications of WIOA on employment outcomes, independent living, and economic self-sufficiency. **NEW IN CRCC 2022 BLUEPRINT**

C. Advocate for diversity, understand, and apply appropriate services that address multicultural counseling issues. [Counseling section of the exam]

D. Understand and apply appropriate rehabilitation terminology and concepts. [Rehabilitation & Disability section of the exam]

E. Understand and identify the differing professional roles, functions, and effective relationships with other providers and professionals. [Counseling section of the exam]

F. Understand the credentialing issues related to the rehabilitation counseling profession and advocate for appropriate solutions. [Counseling section of the exam]

G. Understand the differing organizational structures of rehabilitation counseling practice settings (e.g., public, private-for-profit, and not-for-profit service delivery systems). [Rehabilitation & Disability section of the exam]

- H. **Understand, synthesize, and apply knowledge of historical and philosophical foundations of rehabilitation counseling.** [Rehabilitation & Disability section of the exam]

2. Counseling Theories, Techniques, and Evidence-Based Practice	11.3%
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A. **Apply clinical problem-solving and critical-thinking skills.** [Counseling section of the exam]

B. **Understand rehabilitation techniques for individuals with disabilities.** [Rehabilitation & Disability section of the exam]

C. **Understand individual counseling theories.** [Counseling section of the exam]

- a) Integrated/Eclectic
- b) Rational-Emotive Behavior Therapy
- c) Reality Therapy
- d) Person-Centered
- e) Psychoanalytic
- f) Gestalt
- g) Trait-factor/Person Environment Fit
- h) Behavioral
- i) Cognitive/Behavioral
- j) Adlerian
- k) Solution-Focused
- l) Narrative
- m) Feminist
- n) Existential

D. **Utilize individual counseling practices, interventions, and techniques.** [Counseling section of the exam]

- a) Systematic Desensitization
- b) Behavior Analysis and Therapy
- c) Social Skills
- d) Time Management
- e) Stress Management
- f) Restructuring
- g) Anger Management **NEW IN CRCC 2022 BLUEPRINT**
- h) Problem Solving Therapy **NEW IN CRCC 2022 BLUEPRINT**
- i) Person-centered practices **NEW IN CRCC 2022 BLUEPRINT**
- j) Mindfulness-based practices **NEW IN CRCC 2022 BLUEPRINT**

E. **Understand substance use and treatment.** [Counseling section of the exam]

F. **Establish and maintain effective working alliances with clients.** [Counseling section of the exam]

G. Understand dual diagnosis and co-occurring disorders. [Counseling section of the exam] **NEW IN CRCC 2022 BLUEPRINT**

H. **Understand counseling/training to help clients develop workplace socialization skills.**[Rehabilitation & Disability section of the exam]

I. Demonstrate motivational interviewing use and skills. [Counseling section of the exam]

J. Facilitate treatment planning for clinical conditions (e.g., depression, anxiety, PTSD). [Counseling section of the exam]

K. Understand human growth and development. [Counseling section of the exam]

L. **Apply evidence-based psychosocial/psychiatric rehabilitation interventions in rehabilitation counseling practice.** [Rehabilitation & Disability section of the exam]

M. **Apply evidence-based vocational interventions in rehabilitation counseling practice.**[Rehabilitation & Disability section of the exam]

N. Apply or facilitate evidence-based counseling/therapy for clients with clinical diagnoses (e.g., depression, anxiety, PTSD). [Counseling section of the exam]

O. Apply or facilitate evidence-based counseling/therapy for clients with substance use disorders. [Counseling section of the exam]

P. **Understand theories and techniques of clinical supervision.** [Counseling section of the exam]

Q. Recognize and utilize evidence and research-based practices. [Counseling section of the exam]

3. Group and Family Counseling	4.7%
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A. Understand family counseling theories. [Counseling section of the exam]

B. Incorporate family counseling practices and interventions. [Counseling section of the exam]

C. Understand group counseling theories. [Counseling section of the exam]

D. Incorporate group counseling practices and interventions. [Counseling section of the exam]

4. Crisis and Trauma Counseling and Interventions	6.0%
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- A. **Conduct assessment of client risk and development of a safety plan.** [Counseling section of the exam]
- B. **Provide effective rehabilitation counseling services for individuals with polytrauma injuries.** [Counseling section of the exam]
- C. **Understand the impact of crises, disasters, and other trauma-causing events on people with disabilities.** [Counseling section of the exam]
- D. **Use principles of crisis intervention for people with disabilities during crises, disasters, and other trauma-causing events.** [Counseling section of the exam]
- E. **Understand the emergency management system within rehabilitation agencies and in the community.** [Counseling section of the exam]

5. Medical and Psychosocial Aspects of Chronic Illness and Disability	9.3%
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- A. **Evaluate the psychosocial and cultural impact of disability.** [Rehabilitation & Disability section of the exam]
 - a) Individual adjustment to disability
 - b) Human sexuality and disability issues
 - c) Family or support system adjustment to disability
- B. **Understand medical terminology.** [Rehabilitation & Disability section of the exam]
- C. **Apply knowledge of the medical aspects and implications of various disabilities.** [Rehabilitation & Disability section of the exam]
 - a) Mental Functions
 - b) Sensory Functions and Pain
 - c) Voice and Speech Functions and Structures
 - d) Cardiovascular, Hematological, Immunological, and Respiratory Functions and Structures
 - e) Digestive, Metabolic, and Endocrine Systems and Structures
 - f) Genitourinary and Reproductive Functions and Structures
 - g) Neuromusculoskeletal and Movement Related Functions and Structures
 - h) Skin and Related Functions and Structures
 - i) Nervous System Structures
 - j) Eye, Ear, and Related Structures
 - k) Learning and Applying Knowledge
 - l) Interpersonal Interactions and Relationships
 - m) General Tasks and Demands **NEW IN CRCC 2022 BLUEPRINT**
 - n) Communication **NEW IN CRCC 2022 BLUEPRINT**
 - o) Mobility **NEW IN CRCC 2022 BLUEPRINT**

- p) Self-Care **NEW IN CRCC 2022 BLUEPRINT**
 - q) Domestic-Life **NEW IN CRCC 2022 BLUEPRINT**
 - r) Major Life Areas **NEW IN CRCC 2022 BLUEPRINT**
 - s) Community, Social, and Civic Life **NEW IN CRCC 2022 BLUEPRINT**
- D. Review the implications of medications as they apply to individuals with disabilities. [Rehabilitation & Disability section of the exam]**
- E. Address environmental and attitudinal barriers for individuals with disabilities. [Rehabilitation & Disability section of the exam]**

6. Assessment/Evaluation, Occupational Analysis, & Service Implementation 10.7%

- A. Understand the vocational implications of functional limitations associated with disabilities. [Rehabilitation & Disability section of the exam]**
- a) Mental Functions
 - b) Sensory Functions and Pain
 - c) Voice and Speech Functions and Structures
 - d) Cardiovascular, Hematological, Immunological, and Respiratory Functions and Structures
 - e) Digestive, Metabolic, and Endocrine Systems and Structures
 - f) Genitourinary and Reproductive Functions and Structures
 - g) Neuromusculoskeletal and Movement Related Functions and Structures
 - h) Skin and Related Functions and Structures
 - i) Nervous System Structures
 - j) Eye, Ear, and Related Structures
 - k) Learning and Applying Knowledge
 - l) Interpersonal Interactions and Relationships
 - m) General Tasks and Demands **NEW IN CRCC 2022 BLUEPRINT**
 - n) Communication **NEW IN CRCC 2022 BLUEPRINT**
 - o) Mobility **NEW IN CRCC 2022 BLUEPRINT**
 - p) Self-Care **NEW IN CRCC 2022 BLUEPRINT**
 - q) Domestic-Life **NEW IN CRCC 2022 BLUEPRINT**
 - r) Major Life Areas **NEW IN CRCC 2022 BLUEPRINT**
 - s) Community, Social, and Civic Life **NEW IN CRCC 2022 BLUEPRINT**
- B. Access and review resources for the assessment process. [Counseling section of the exam] **NEW IN CRCC 2022 BLUEPRINT****
- a) Review of case materials for pertinent information **NEW IN CRCC 2022 BLUEPRINT**
 - b) Diagnostic and Statistical Manual of Mental Disorders (DSM)
 - c) International Classification of Diseases (ICD) **NEW IN CRCC 2022 BLUEPRINT**

- C. Refer or conduct informal assessments.** [Counseling section of the exam] **NEW IN CRCC 2022 BLUEPRINT**
- a) Interviews and initial assessments **NEW IN CRCC 2022 BLUEPRINT**
 - b) Situational assessment/job shadowing/community-based work assessment
- D. Refer or conduct formal assessments.** [Counseling section of the exam] **NEW IN CRCC 2022 BLUEPRINT**
- a) Achievement Tests
 - b) Aptitude Tests
 - c) Intelligence Tests
 - d) Interest Inventories
 - e) Career, Work Values, and Maturity Tests
 - f) Personality Tests
 - g) Psychological/Neuropsychological Tests
 - h) Adaptive Behavior/Behavioral Observations
 - i) Mental Health Screeners **NEW IN CRCC 2022 BLUEPRINT**
 - j) Learning Styles Tests
 - k) Ecological/Functional Capacity Evaluations
 - l) Dexterity Tests
 - m) Work Samples
 - n) Non-Cognitive Tests **NEW IN CRCC 2022 BLUEPRINT**
- E. Refer or perform Transferable Skills Analysis (e.g., VDARE).** [Counseling section of the exam] **NEW IN CRCC 2022 BLUEPRINT**
- F. Interpret assessment results for rehabilitation planning purposes.** [Counseling section of the exam]
- G. Perform job analysis.** [Rehabilitation & Disability section of the exam]
- H. Assess ergonomic, job accommodation, and assistive technology needs.** [Rehabilitation & Disability section of the exam]
- I. Advise on job modification and restructuring techniques.** [Rehabilitation & Disability section of the exam]
- J. Perform labor market analysis.** [Rehabilitation & Disability section of the exam] **NEW IN CRCC 2022 BLUEPRINT**
- a) Occupational and labor market information (e.g., DOT, ORS, O*NET, OOH, other national, regional, or local government labor market sources, private salary surveys)
 - b) Methods and techniques used to conduct labor market surveys
- K. Use computer-based job matching systems.** [Counseling section of the exam]

7. Career Development and Job Placement	9.3%
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- A. Understand, identify, and apply career development and job placement strategies.** [Rehabilitation & Disability section of the exam]

B. Understand, identify, and apply job readiness, seeking, and retention skills.
[Counseling section of the exam]

C. Understand the unique needs of specialized populations in relation to job development and placement. [Rehabilitation & Disability section of the exam]
NEW IN CRCC 2022 BLUEPRINT

D. Understand techniques to develop and retain relationships with employers to assist with job development and placement.
[Rehabilitation & Disability section of the exam]

E. Understand and identify evidence-based employment models and services tailored to individuals with significant disabilities and/or barriers to competitive employment. [Rehabilitation & Disability section of the exam]

- i. Supported Employment (SE)
- ii. Customized Employment (CE)
- iii. Individual Placement and Support (IPS)
- iv. Self-Employment

F. Understand the unique needs of individuals with a dual diagnosis in the workplace and apply appropriate strategies. [Rehabilitation & Disability section of the exam]

G. Understand and apply theories of career development and work adjustment.
[Counseling section of the exam]

- a. Trait-Factor/Person Environment Fit theories.
- b. Personality theories
- c. Developmental/Self-Concept theories
- d. Sociological/Self-Concept theories
- e. Behavioral theories

H. Understand, identify, and facilitate the appropriate use of work conditioning or work hardening resources and strategies. [Rehabilitation & Disability section of the exam]

I. Understand the effective use of and risks of social media as a networking tool.
[Counseling section of the exam]

8. Business Engagement

7.6%

A. Assist employers with job accommodations for their employees with disabilities (e.g., assistive technology, workspace modifications).
[Rehabilitation & Disability section of the exam]

B. Provide consultation services and training to employers / businesses concerning disability concepts, best practices, and applicable laws (e.g., hiring, return to

work, reasonable accommodations, and retention). [Rehabilitation & Disability section of the exam]

- C. Partner with employers/businesses to address needs and concerns related to hiring and retaining individuals with disabilities. [Rehabilitation & Disability section of the exam]
- D. Understand, communicate, and apply business-focused strategies, techniques, and terminology to improve employment outcomes for individuals with disabilities. [Rehabilitation & Disability section of the exam]
- E. **Work with employers to develop pipelines for employing individuals with disabilities using work-based learning and training methods.** [Rehabilitation & Disability section of the exam] **NEW IN CRCC 2022 BLUEPRINT**
 - a) Apprenticeships **NEW IN CRCC 2022 BLUEPRINT**
 - b) Internships **NEW IN CRCC 2022 BLUEPRINT**
 - c) On-the-job training (OJT) **NEW IN CRCC 2022 BLUEPRINT**
- F. **Understand the dual customer role (e.g., employer and person with a disability).** [Rehabilitation & Disability section of the exam] **NEW IN CRCC 2022 BLUEPRINT**

9. Community Resources and Partnerships

8.0%

- A. Understand the programs and services available for specific and underserved populations. [Rehabilitation & Disability section of the exam]
- B. **Understand Social Security programs, benefits, work incentives, and disincentives.** [Rehabilitation & Disability section of the exam]
- C. Possess knowledge of funding sources and community resources for rehabilitation services. [Rehabilitation & Disability section of the exam]
- D. Provide or facilitate skills development and independent living services. [Rehabilitation & Disability section of the exam]
- E. Provide or facilitate financial literacy training. [Rehabilitation & Disability section of the exam]
- F. **Understand and refer to services available through client advocacy programs (e.g., Client Assistance Program [CAP], legal aid).** [Rehabilitation & Disability section of the exam]
- G. Refer to and partner with one-stop career centers and
 - a. other community stakeholders. [Rehabilitation & Disability section of the exam]

- H. Understand and facilitate life care planning and life care planning services. [Rehabilitation & Disability section of the exam]
- I. Advocate with community partners for full community inclusion for people with disabilities. [Rehabilitation & Disability section of the exam] NEW IN CRCC 2022 BLUEPRINT
- J. Provide or facilitate counseling on the impact of employment on community services and benefits. [Rehabilitation & Disability section of the exam] NEW IN CRCC 2022 BLUEPRINT

10. Case Management	10.0%
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- A. Understand and apply the case management process. [Counseling section of the exam]
 - a) Case finding
 - b) Planning
 - c) Service coordination
 - d) Referral to and utilization of other disciplines
 - e) Advocacy
- B. Complete case recording and documentation. [Counseling section of the exam]
- C. Understand and apply negotiation, mediation, and conflict resolution strategies. [Counseling section of the exam]
- D. Understand and apply the principles of caseload management. [Counseling section of the exam]
- E. Understand and address institutional and social barriers that impede access, equity, and success for clients. [Counseling section of the exam]
- F. Apply techniques for working with individuals with limited English proficiency or varied communication methods. [Counseling section of the exam]
- G. Understand and apply principles, models, and documentation formats for biopsychosocial case conceptualization and treatment planning. [Counseling section of the exam]

11. Health Care and Disability Management	7.3%
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- A. Understand and provide appropriate medical intervention resources. [Rehabilitation & Disability section of the exam]
- B. Understand the diversity of healthcare benefits, delivery systems, and the impact of services on individuals with disabilities. [Rehabilitation & Disability section of the exam]

- C. Understand and collaborate with health promotion and wellness providers regarding strategies for people with chronic illness and disability. [Rehabilitation & Disability section of the exam]
- D. Understand different insurance programs (e.g., Medicare, Medicaid, group and individual, short-and long-term disability, personal injury no-fault liability). [Rehabilitation & Disability section of the exam]
- E. Understand and apply disability prevention and management strategies. [Rehabilitation & Disability section of the exam]
- F. Understand the variability of workers' compensation laws and practices. [Rehabilitation & Disability section of the exam] **NEW IN CRCC 2022 BLUEPRINT**

12. Research, Methodology, and Performance Management	5.3%
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- A. Understand statistics and psychometric concepts related to measurement. [Counseling section of the exam]
 - a. Validity
 - b. Reliability/ Standard Error of Measurement
 - c. Norms
 - d. Scaled and Standard Scores
 - e. Percentiles
 - f. Distributions/Bell Curve
 - g. Norm- and Criterion-Referenced Measurement **NEW IN CRCC 2022 BLUEPRINT**
- B. Understand research methods (e.g., surveys, case studies) and data analysis. [Counseling section of the exam]
- C. Assess research literature related to evidence -based practice. [Counseling section of the exam]
 - a. Research databases (e.g., EBSCO, PsycINFO, MEDLINE)
 - b. Ability to select between various levels of evidence-based research (e.g., subject matter experts to the systematic reviews and meta-analyses gold standard) **NEW IN CRCC 2022 BLUEPRINT**
- D. Comprehend concepts and principles of organizational development and stakeholder management. [Counseling section of the exam]
 - a) Effective management of services and programs, including areas such as administration, finance, benefit systems, and
 - b) accountability
 - c) Strategic planning techniques and budget planning

E. Understand program evaluation procedures for assessing the effectiveness of rehabilitation services and outcomes. [Rehabilitation & Disability section of the exam]

Additionally, CRCC is recommending the following changes:

THE LEARNING ENVIRONMENT: FACULTY AND STAFF (pp. 4-5)

Recommendations:

Under Faculty & Staff - Z "...Core counselor education faculty must meet one of the following

Delete the following language:

- 1) have earned doctoral degrees in counselor education, preferably from a CACREP accredited program, or
- 2) have related doctoral degrees and have been employed as full-time faculty members in a counselor education program for a minimum of one full academic year before July 1, 2013, or
- 3) have (a) been employed as a full-time faculty member in a CORE-accredited master's program prior to July 1, 2017, or (b) graduated from a rehabilitation doctoral program prior to January 1, 2018."

Replace the standards language above with inclusive language emphasizing knowledge, skill, and experience vs. the type of program they graduated from.: "Core counselor education faculty must have the necessary knowledge, skills, and experience needed to teach in a Counselor Education program. Faculty teaching Clinical Rehabilitation or Rehabilitation Counseling Programs must hold the Certified Rehabilitation Counselor (CRC) credential. Faculty holding the CRC demonstrate both a minimum level of competence in working with people with a disability and have a rehabilitation counseling identity.

In Addition:

1. Allow graduates of non-CACREP programs to petition to become core faculty members. Establish criteria or a pathway for prospective faculty to demonstrate through master's level counselor education, professional activities, scholarship, and/or credentials (such as a certification as a CRC) that they have a rehabilitation counseling professional identity.

FOUNDATIONAL COUNSELING CURRICULUM (pp. 12-17)

Recommendation:

Change the third sentence in the first paragraph of the FOUNDATIONAL COUNSELING CURRICULUM section on page 12 to read "Ethical behavior, diversity, **disability inclusion**, and critical thinking are integral to counselor preparation and should be infused throughout the curriculum."

Disability inclusion is a concept that should be clearly infused throughout the eight core curriculum areas. Currently in Draft 2 there is only one mention of disability in the eight core curriculum areas in the Lifespan Development section I. "models of psychosocial adjustment to illness and **disability**" on page 14.

ENTRY LEVEL SPECIALIZED PRACTICE AREAS. (p.22)

As the standards continue to evolve and develop, **we are recommending** CACREP extend the 2023 sunset clause until 2025. This provides for an extended pathway for the current dual

programs [Clinical Mental Health/Clinical Rehabilitation] who must decide by 2023 which program they will retain. This extension enables the programs to evaluate the new standards.

GLOSSARY TO ACCOMPANY THE 2024 CACREP STANDARDS DRAFT 2 (pp. 36-42)

We commend the standards revision committee on including disability related concepts in the glossary. There are definitions of disability and related concepts in the glossary including 1) **disability** (as defined by The World Health Organization), 2) **accessibility**, 3) **accommodation**, 4) **employment models**, 5) **inclusive learning environment**, 6) **legal rights (of individuals with disabilities)**, and 7) **universal design**. It should be noted that the Family Medical Leave Act (FMLA) listed in the definition of “legal rights” is available to all individuals regardless of disability status. Eligibility guidelines for FMLA are on the Department of Labor website at <https://www.dol.gov/agencies/whd/fmla>

Recommendation:

Change the glossary term “legal rights (of individuals with disabilities)” to “**legal rights**” because the policies listed are applicable to all individuals served by counselors, not only individuals with disabilities.

Finally, **CRCC is recommending** that CACREP incorporate the following or similar language in their standards **Entry Level Specialized areas – Rehabilitation Counseling (p.27)**:

Recommendation: To encompass the breadth and scope of Entry Level (MINIMAL COMPETENCIES) for graduates Clinical Rehabilitation & Rehabilitation Counseling programs, CACREP strongly supports the research of CRCC’s Job Task Analysis a/k/a Role & Function studies, and therefore, recommends all Rehabilitation Counseling programs incorporate the CRCC 2022 JTA Domain Blueprint into your curriculum.

Thank you for the opportunity to submit our comments.

Regards,

Pam Shlemon

Pam Shlemon
Executive Director

Cayte Anderson

Cayte Anderson, Ph.D., CRC
Board President