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ADDRESSEES: STATE VOCATIONAL REHABILITATION AGENCIES
STATE REHABILITATION COUNCILS
CLIENT ASSISTANCE PROGRAMS
AMERICAN INDIAN VOCATIONAL REHABILITATION SERVICES
PROJECTS

SUBJECT: Federal Requirements Governing the Composition and Membership of,
and Appointments to, the State Rehabilitation Councils

PURPOSE:

On January 18, 2017, the Rehabilitation Services Administration (RSA) issued Policy Directive (PD) 17-01 titled "Retirement of Certain Policy Issuances." Through that PD, RSA retired the policy issuances that were outdated due to changes in law, regulations, or reporting requirements resulting from the amendments to the Rehabilitation Act of 1973 (Rehabilitation Act) made by title IV of the Workforce Innovation and Opportunity Act (WIOA), including Technical Assistance Circular (TAC) 12-01, "Federal Requirements Governing the Composition and Membership of, and Appointments to, the State Rehabilitation Councils." Through this TAC 23-02, RSA reissues the guidance from TAC 12-01, addresses a technical change related to the membership of the representative of the American Indian Vocational Rehabilitation Services (AIVRS) projects, and clarifies the appointment of, and term limits for, the director of vocational rehabilitation (VR) agencies (see Questions 3, 5, and 12).

Section 101(a)(21) of the Rehabilitation Act, as amended by WIOA, requires the State to assure in the VR Services Portion of the Unified or Combined State Plan that either the designated State agency (DSA) is an independent State commission that is consumer-controlled, or the State has established a State Rehabilitation Council (SRC) that meets the requirements set forth in Section 105 of the Rehabilitation Act. Except for those States in which the DSA is an independent State commission established pursuant to Section 101(a)(21)(A)(i) of the Rehabilitation Act, a State must establish a SRC so that the State can receive funding for the administration and operation of the VR program (Section 105(a)(1) of the Rehabilitation Act). However, the Rehabilitation Act does not prohibit a State from establishing both an independent commission and a SRC if it chooses to do so.

Among its several responsibilities, the SRC reviews, evaluates, and advises the agency regarding its performance and effectiveness in the delivery of services and the effect of service provision

on the achievement of employment outcomes by individuals with disabilities (Section 105(c)(1) of the Rehabilitation Act). Additionally, the SRC ensures that the voice of the community of stakeholders is heard as agencies develop and implement policies and procedures that directly affect the individuals served by the VR agency (Sections 101(a)(16) and 105(c)(2) and (6) of the Rehabilitation Act).¹

When constituted in accordance with Federal requirements, the SRC brings together a variety of individuals with disabilities, disability groups, VR professionals, service providers, and leaders in the community, including those representing business, industry, and labor. To ensure that each SRC is properly constituted so that it is able to carry out its mandated functions, RSA provides, through this TAC, guidance to VR agencies and SRCs regarding the Federal requirements concerning the composition and membership of, and appointments to, the SRC.²

TECHNICAL ASSISTANCE:

The information contained in this TAC is presented below in a series of frequently asked questions by VR agencies and SRCs. Except where otherwise noted, all requirements discussed herein also apply to SRCs established in States with a separate VR agency serving individuals who are blind and visually impaired.

1. Who has the authority to appoint members to the SRC?

Except in a very limited number of States, the governor must appoint the members of the SRC (Section 105(b)(3) of the Rehabilitation Act; 34 C.F.R. § 361.17(a)). However, in those few States where the State's constitution or statutes vest authority to carry out activities under the Rehabilitation Act in another entity, including one or more houses of the legislature or an independent board, the chief officer of that entity has the authority to make the appointments to the SRC (Id.). For example, a State's constitution may establish an elected board of education that is structurally independent from the State's executive branch and from the control of the governor. In such circumstances, the State's statute may identify the elected board as the entity charged with the responsibility to carry out the activities under the Rehabilitation Act. In that case, the board's president, as its chief officer, has the authority to appoint the members of the SRC.

When making the appointments, the appointing authority must do so only after receiving recommendations from representatives of organizations representing a broad range of individuals with disabilities. To the greatest extent practicable, the appointing authority must take into account the extent to which minority populations are represented on the SRC (Id.). This requirement is consistent with the Rehabilitation Act that emphasizes outreach to individuals from minority backgrounds and the need for the VR program to better reflect the culturally diverse population of the United States.

¹ A complete list of the SRC's mandated functions and responsibilities are in Section 105(c) of the Rehabilitation Act and its implementing regulations in 34 C.F.R. § 361.17(h).

² This TAC does not address Federal requirements, in Section 101(a)(21)(A)(i) of the Rehabilitation Act and 34 C.F.R. § 361.16(a)(1), pertaining to the composition and functions of an independent commission established for the purpose of overseeing and administering a State's VR program.

2. Must the director of the designated State unit (DSU) be a member of the SRC?

Yes, regardless of whether the SRC is established pursuant to Section 105(b)(1)(A) or (B) of the Rehabilitation Act, the director of the DSU must be appointed to the SRC as an ex officio, nonvoting member (Section 105(b)(2) of the Rehabilitation Act; 34 C.F.R. § 361.17(b)(i)(xii)). In those States where one SRC represents two DSUs—one for individuals who are blind and one for all other individuals with disabilities—both directors must be appointed to the SRC. These member(s) of the SRC serve in an ex officio, nonvoting capacity.

3. Must the director of the DSU be appointed by the governor or other appointing authority?

Yes. There is no basis in the Rehabilitation Act or VR program regulations to exempt the director of the VR agency from the regulatory requirements that the governor or other appointing authority in each State must appoint the director of the VR agency to the SRC. As previously discussed, VR program regulations in 34 C.F.R. § 361.17(a)(1) require that the governor or other appointing authority, as applicable, appoint the members of the SRC. The regulations then specify the members of the SRC, including the director of the VR agency (34 C.F.R. § 361.17(b)(1)(xii)). The provisions in 34 C.F.R. § 361.17(a)(1) contain no exceptions to the requirement that the governor appoint the members of the SRC with respect to any of the individuals listed in 34 C.F.R. § 361.17(b)(1).

Although the Rehabilitation Act and the VR program regulations do not define the term, RSA recognizes that an “ex officio” member can refer to an individual who serves on an entity, such as an advisory council, by virtue of the position they hold with a particular group or organization, and that in some cases, but not all, individuals who represent their organizations in an ex officio capacity on advisory councils may not be required to be officially appointed to the councils. However, this is not the case with respect to the appointment of ex officio members to the SRC. The regulations specify that two members of the SRC serve in an ex officio capacity—a qualified VR counselor if employed by the DSU and the director of the DSU (34 C.F.R. § 361.17(b)(1)(iv) and (xii)). While these provisions describe these two members as non-voting, no mention is made therein to their appointment. Rather, as stated above, the provisions that address the appointment of members to the SRC make no exceptions to the list contained in 34 C.F.R. § 361.17(b)(1).

4. What are the other composition and membership requirements for the SRC?

The membership requirements, set forth in Section 105(b) of the Rehabilitation Act and 34 C.F.R. § 361.17(b), ensure that various constituencies of the VR program have a voice in the conduct of the VR program in the State. A SRC must be comprised of at least 15 members (Section 105(b)(1)(A) and (B) of the Rehabilitation Act; 34 C.F.R. §§ 361.17(b)(1) and (3)). However, a separate SRC for agencies serving individuals who are blind and visually impaired may consist of fewer than 15 members, if State law establishing this lower minimum number of members was in effect on October 29, 1992, the day of enactment of the Rehabilitation Act Amendments of 1992 (Section 105(b)(1)(C); 34 C.F.R. § 361.17(b)(4)).

A majority of SRC members must be individuals with disabilities who do not work for the DSU (Section 105(b)(4)(A) of the Rehabilitation Act; 34 C.F.R. § 361.17(c)(1)). In those States that establish a separate SRC for the agency serving the blind, the majority of that SRC must be composed of individuals who are blind and do not work for the DSU (Section 105(b)(4)(B) of the Rehabilitation Act; 34 C.F.R. § 361.17(c)(2)).

In accordance with Section 105(b)(1)(A) of the Rehabilitation Act and 34 C.F.R. § 361.17(b)(1), States may appoint more than 15 members to the SRC, so long as the membership includes all of the required representatives described below:

- at least one representative of the Statewide Independent Living Council (SILC)—who must be either the chairperson or another designee of the SILC;
- at least one representative of a parent training and information center established pursuant to Section 682(a) of the Individuals with Disabilities Education Act;
- at least one representative of the Client Assistance Program (CAP) who must be either the CAP director or another individual recommended by the CAP;
- at least one qualified VR counselor with knowledge of and experience with the VR program. This individual serves as a nonvoting, *ex officio* member if they are employed by the DSA;
- at least one representative of community rehabilitation program service providers;
- four representatives of business, industry, and labor;
- representatives of disability advocacy groups: (a) representing a cross section of individuals with physical, cognitive, sensory, and mental disabilities; and, (b) representing individuals with disabilities who have difficulty representing themselves or are unable to represent themselves due to their disabilities;
- at least one former or current applicant for, or recipient of, VR services;
- at least one representative of the directors of AIVRS projects, if such projects are funded under Section 121 of the Rehabilitation Act in such State;
- at least one representative of the State educational agency responsible for the public education of students with disabilities; and
- at least one representative from the State workforce development board.

There is no statutory basis to require additional SRC members from other State entities (e.g., the State’s Council on Developmental Disabilities, entities carrying out programs under the Assistive Technology Act of 1998, and groups of, or representing, individuals with intellectual and developmental disabilities in the State). However, the Rehabilitation Act does not prohibit a State from electing to add more members to its SRC if it determines this is appropriate.

Pursuant to Section 105(b)(1)(B) of the Rehabilitation Act and 34 C.F.R. § 361.17(b)(3)(i), States that have established a separate SRC for a VR agency serving individuals who are blind and visually impaired must satisfy all of the above membership requirements, with only a few exceptions permitted. In particular, instead of including representatives of a cross section of disability groups, the SRC for a separate agency serving the blind and visually impaired must include at least one individual who represents an advocacy group for the blind (34 C.F.R. § 361.17(b)(3)(ii)(A)). In addition, this SRC must include at least one representative of an

individual who is blind, has multiple disabilities, and has difficulty representing himself or is unable due to disabilities to represent himself (34 C.F.R. § 361.17(c)(3)(ii)(B)).

RSA recommends that appointing officials, and those who advise them, make every effort to ensure, whenever practicable, that the SRC includes representation from more than one advocacy group in those States where there are more than one advocacy group representing individuals with disabilities, including more than one advocacy group representing individuals who are blind. In those States where there is one SRC representing both DSUs for the VR program, RSA encourages the appointing authority to appoint representatives from a cross section of disability groups that include those advocacy groups of the blind.

5. What changes did WIOA make to SRC composition and membership requirements in the Rehabilitation Act?

Section 105(b)(1) of the Rehabilitation Act, as amended by WIOA, made only one change to the composition and membership requirements of the SRC. Specifically, WIOA amended Section 105(b)(1)(A)(ix) of the Rehabilitation Act, which outlines the SRC composition requirement related to the AIVRS projects funded under Section 121 of the Rehabilitation Act. Unlike most programs in which funds are awarded to a State or an entity in a State, RSA awards Section 121 grant funds to the governing bodies of Indian Tribes located on Federal or State reservations and consortia of such governing bodies. If an AIVRS project's reservation crosses State lines, it would be included in the AIVRS projects represented on the SRC in each State in which the reservation exists. In that context, the distinctions between "funded," as used in WIOA, and "carried out," as had been used previously, provides no substantive differences in practical meaning. For that reason, RSA considers this change primarily technical in nature.

6. Can an entity be represented on the SRC by an individual who is not a member or employee of that entity?

With few exceptions, Section 105(b) of the Rehabilitation Act and 34 C.F.R. § 361.17(b)(1) require that "representatives" of specified organizations must be appointed to sit on the SRC. Neither the Rehabilitation Act nor its implementing regulations require that the representatives be employees or members of those organizations. Therefore, RSA has interpreted this to mean that those organizations may be represented by individuals who are not members or employees of those organizations (preamble to the Final Regulations, 66 FR 4380, 4422 (Jan. 17, 2001)).

As noted elsewhere in this TAC, while the organizations and entities represented on the SRC must provide their recommendations of representatives, the final appointment decision is vested in the governor or other appointing authority. Although RSA strongly encourages that the representatives be active members or employees of those organizations, RSA also recognizes that the appointing authority may appoint a nonmember or someone who is not employed by that organization. RSA recommends that careful consideration be given, prior to such a decision, to whether such an individual can truly represent the organization for which they are being appointed. For a SRC member to best carry out their responsibilities on the SRC, RSA expects that if someone who is not a member or employee of that entity is appointed, that member would

be closely affiliated with and knowledgeable about the entity whose interests the individual is charged with representing.

7. Which SRC members may vote?

With limited exceptions, all members of the SRC have the right to vote on matters before the council. The first of the exceptions prohibits representatives who are employed by the VR agency or its DSA from voting on SRC matters (34 C.F.R. § 361.17(b)(2)). For example, the director of the DSU serves as an ex officio and is a nonvoting member (Section 105(b)(2) of the Rehabilitation Act; 34 C.F.R. § 361.17(b)(1)(xii)). Similarly, the member who serves as a qualified VR counselor, if that individual works for the VR agency at the time they are appointed to the council, also serves as an ex officio and is a nonvoting member (Section 105(b)(1)(A)(iv); 34 C.F.R. § 361.17(b)(1)(iv)). However, if the CAP representative is from a CAP that is housed within the VR agency, that individual representative is not so restricted and, therefore, may vote on matters before the SRC (34 C.F.R. § 361.17(b)(2)).

The second of the exceptions pertains to those matters before the council when a conflict of interest—or the appearance of a conflict of interest – exists (e.g., when the vote would result in a direct financial gain for that individual or the organization they represent). In such circumstances, individuals must not vote on such matters. Members also must not vote when there is an appearance of a conflict of interest under State law (Section 105(e) of the Rehabilitation Act; 34 C.F.R. § 361.17(g)). If there is a conflict of interest, or the appearance of a conflict of interest, the SRC member must recuse themselves from that particular vote, explaining to the council as necessary the reason for the recusal.

8. When an individual with a disability is appointed to represent an agency or entity on the SRC, does this count toward the majority representation of individuals with disabilities?

Yes, so long as the individual is not an employee of a State VR agency. As noted above, the SRC must be composed of a majority of individuals with disabilities who are voting members (Section 105(b)(4); 34 C.F.R. § 361.17(c)). This requirement applies even if more than the minimum of 15 individuals are appointed to serve on the council.

9. Can one person represent more than one agency or stakeholder group on the SRC?

No, a member of the SRC can represent only one agency or organization on the council at a time. For example, an individual who is a former or current applicant or client of VR services may not also serve as a representative of a disability group, even though that individual may be affiliated with such a group.

RSA recognizes that some States have difficulty maintaining a sufficient pool of qualified individuals to serve on the SRC. Nevertheless, Section 105(b) of the Rehabilitation Act and 34 C.F.R. § 361.17(b) require that the SRC have at least 15 members, each of whom represents a specific component of the disability community. Because each member represents a different

interest, sometimes one that is divergent from that of other members, RSA maintains that each organizational requirement must be met separately.

10. How is the chairperson of the SRC selected?

Every SRC must have a chairperson. The members of the SRC must select the chairperson from among the voting members of the SRC (Section 105(b)(5)(A) of the Rehabilitation Act; 34 C.F.R. § 361.17(d)(1)). Therefore, ex officio members of the SRC, such as the director of the DSU or a qualified VR counselor employed by the DSU, cannot be selected to serve as the chairperson. The governor may veto the council's choice of chairperson if State law grants this authority to the governor (Id.). In States where the governor does not have a veto power, or in which another entity is granted the authority to make appointments to the SRC, that entity may select a chairperson or require the SRC to select a chairperson (Section 105(b)(5)(B) of the Rehabilitation Act; 34 C.F.R. § 361.17(d)(2)). There is nothing in Federal law to prohibit a SRC from selecting co-chairs.

Although not required, RSA strongly recommends that a chairperson of the SRC be an individual with a disability or, in the case of a SRC for agencies serving the blind and visually impaired, that the chairperson be blind or visually impaired. RSA also encourages SRC members to select a chairperson in accordance with the council's bylaws and with attention to a number of factors, including availability of the individual to take on the responsibility of serving as chairperson, demonstrated leadership skills, and a minimum potential for conflicts of interest that might result in frequent recusals from voting or actively participating in the work of the council.

11. How long can a member serve on the SRC?

Each SRC member must be appointed to serve no more than two consecutive full three-year terms (Section 105(b)(6)(A) and (B) of the Rehabilitation Act; 34 C.F.R. § 361.17(e)(1)). This rule does not apply to the individuals representing the CAP or the AIVRS project (Id.). If a council member is appointed to replace a former member who did not complete their term, the new council member must be appointed for the remainder of the vacated term for which they are being appointed—not a full three-year term (Section 105(b)(6)(A)(i) of the Rehabilitation Act; 34 C.F.R. § 361.17(e)(2)). Once that initial term is completed, the individual may be appointed to fill a second term of three years (Section 105(b)(6)(A)(i) and (B) of the Rehabilitation Act; 34 C.F.R. § 361.17(e)(2)).

When each SRC was originally established, the length of the members' terms were to be staggered, so that the SRC remained fully constituted as the initial terms expired; however, no single term was to be longer than three years (Section 105(b)(6)(A)(ii) of the Rehabilitation Act; 34 C.F.R. § 361.17(e)(3)). This staggered approach to the setting of the length of a member's term also can be used in the rare instance when the SRC must be re-established after the terms of all members have lapsed.

12. Is the director of the DSU exempt from the term limit requirements?

Yes. The limitation of membership of two consecutive terms does not apply to the service of VR agency directors on the SRC. The director of a VR agency, like all members, is appointed to the SRC for a three-year term (34 C.F.R. § 361.17(e)(1)). At the conclusion of the three-year term, the VR director must be reappointed by the governor or other appointing authority. The limit of two consecutive terms does not apply to VR directors as it is possible for only one individual to qualify to fill this role on the SRC at any point in time. Therefore, specific statutory or regulatory language such as that exempting the representatives of the CAP and AIVRS projects from the term limit is not required for RSA to maintain this position.

13. Can a member of the SRC continue to serve on the council once their term has expired?

It has come to RSA's attention that some States have enacted statutes or regulations, or have adopted policies, permitting a member of an advisory council in general, or the SRC specifically, to continue in their role on the council after the term of membership, set by Federal law, has expired, until the governor reappoints the individual or appoints another person to replace that member. Whether these statutes, regulations, or policies are consistent with the provisions of the Rehabilitation Act and its implementing regulations is a matter of Federal constitutional principle.

The Rehabilitation Act typically grants wide flexibility to States in the implementation of Federal requirements governing the administration and operation of the VR program. Nonetheless, Section 105 of the Rehabilitation Act is prescriptive with respect to SRC membership criteria, as well as the length and number of terms a member is permitted to serve. Although the Rehabilitation Act provides for a few exceptions to each of these requirements (e.g., the CAP representative is not limited in the number of terms they can serve), even the exceptions are very specifically detailed. The specificity of these particular requirements is intended to ensure that the SRC is well qualified to carry out its responsibilities and functions in a meaningful manner.

Consequently, the Supremacy Clause of the U.S. Constitution dictates that the very clear and specific language contained in the provisions of the Rehabilitation Act and implementing regulations pertaining to the terms of service for SRC members supersede such State statutes and regulations. If permitted, the implementation of the State's statutes or regulations would both interfere with and undermine the proper implementation of the Rehabilitation Act. The implementation of a State's policy allowing a SRC member to sit beyond their term would have the direct effect of undermining the provisions of Section 105 of the Rehabilitation Act specifying the time limit for SRC membership. Therefore, no member of the SRC to whom term limits apply can continue to serve on the council once their term has expired unless they are reappointed, if eligible.

In an effort to minimize the effect SRC vacancies may have on the council's ability to continue its work, the Rehabilitation Act created two safeguards. First, Section 105(b)(7)(A) of the Rehabilitation Act makes it clear that a vacancy must not affect the ability of the remaining SRC members to perform their duties. Second, Section 105(b)(7)(B) of the Rehabilitation Act permits

the appointing authority to delegate the authority to the remaining SRC members to fill a vacancy once the appointing authority has made the original appointment.

14. Can the same individual serve two terms representing one agency or entity and then serve additional terms representing a different agency or entity?

There is nothing in Federal law to prohibit an individual, whose term of membership has expired or who has left the SRC, from being appointed to a new term. However, this appointment must be done consistent with the term-limit requirements already discussed. In other words, if an individual has served the maximum number of terms as a representative of a particular organization, they may not be immediately reappointed to that same membership slot or any other membership slot. A meaningful break in service must occur before that individual may sit as a member of the SRC again. Both the Rehabilitation Act and its implementing regulations are very clear that “members” are appointed, and that “members” have specific term limits. In other words, both the Rehabilitation Act and its implementing regulations speak in terms of the individuals serving on the council, not the seats they represent. Therefore, in order to give meaning to the specificity of the term limits imposed by Federal law, no member should be appointed—after having already served the maximum time allowed—to a new membership seat until a meaningful break in service to the council has passed. Because neither the Rehabilitation Act nor its implementing regulations define this break in service, RSA encourages SRCs to consider addressing this issue through its bylaws so that criteria may be established to govern when an individual may be appointed to the SRC again.

15. How is a SRC member replaced if they cannot complete their term?

The governor or other appointing authority in the State must select a member to fill a vacant position in the middle of a term in the same manner as members appointed to a full term (Section 105(b)(7)(A) of the Rehabilitation Act; 34 C.F.R. § 361.17(f)(1)). However, the appointing authority can delegate this responsibility to the remaining members of the SRC after making the initial appointment (Id.). The substituting member must be appointed for the entire remainder of the departing member’s term (Section 105(b)(6)(A)(i) of the Rehabilitation Act; 34 C.F.R. § 361.17(e)(2)). RSA interprets these statutory and regulatory provisions to permit a member, who completed the term of a vacating member, to be appointed for a consecutive full three-year term.

16. Can members be removed from the SRC, by whom, and under what circumstances?

Neither the Rehabilitation Act nor its implementing regulations specify requirements governing the removal of a SRC member whose term has not expired. Each SRC has adopted bylaws that provide guidelines on how all aspects of the SRC are to be managed, which could include the varying circumstances that could cause the possible removal of an active member of the council. The council should then make a recommendation for removal to the governor or other appointing authority. The governor or appointing authority would ultimately make the decision since they made the original appointment.

17. Can SRC members receive compensation for their service on the council?

Members are not compensated for their service, which is voluntary, but may be compensated for expenses incurred in the course of their service or be compensated for lost income as a result of attending to council business. This may include attending council meetings, hearings, and forums sponsored by the council or for receiving training which is deemed necessary by the council for the purpose of facilitating the members' ability to carry out their assigned duties as council members (Section 105(g) of the Rehabilitation Act; 34 C.F.R. § 361.17(k)).

Examples of expenses that may be reimbursed include childcare expenses, costs associated with personal assistance services, reasonable accommodations for individuals with disabilities, and other necessary expenses for individual members to participate in the work of the council. Compensation may be made for lost wages that occur as a direct result of participating in council activities.

RSA encourages SRCs to plan meetings and other activities of the council and its established committees to minimize the need for individuals to take time from work, and thus reduce the need for compensation for lost wages, in order to maximize the resources of the council for other council activities. There is no Federal requirement that compensation be equivalent to the wages earned by the individual, and, therefore, the level may be set by the council in accordance with its bylaws. RSA encourages SRCs to consider carefully the balance between maximizing the council's resources, and minimizing the inconvenience and expenses incurred by members in the course of participating on the council so that individuals are not unduly deterred from serving.

SUMMARY:

The SRC plays an important role in advising and guiding State VR agencies to ensure the effective delivery of VR services to eligible individuals with disabilities in the community. RSA believes that the SRC should represent as great a diversity of voices from the disability community as possible, including racial, ethnic, cultural, linguistic, and gender diversity, as well as a wide range of physical, intellectual, and mental health disabilities. All of the requirements discussed above are intended to support these goals of ensuring that the voices of individuals with disabilities served by State VR agencies are heard, along with the voices of the community of stakeholders, business and labor leaders, and VR service providers who work together to assist individuals with disabilities in achieving competitive integrated employment.

CITATIONS:

Section 105 of the Rehabilitation Act of 1973, as amended by Title IV of the Workforce Innovation and Opportunity Act

VR program regulations in 34 C.F.R. § 361.16 and 34 C.F.R. § 361.17

INQUIRIES:

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/s/

Carol L. Dobak
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delegated the authority to perform the
functions and duties of the Commissioner

cc: Council of State Administrators of Vocational Rehabilitation
National Council of State Agencies for the Blind
National Coalition of State Rehabilitation Councils
Consortia of Administrators of Native American Rehabilitation
National Disability Rights Network