



COUNCIL OF STATE ADMINISTRATORS OF VOCATIONAL REHABILITATION

1 Research Court, Suite 450
Rockville, MD 20850
(301) 519-8023 phone
www.csavr.org

CHIEF EXECUTIVE OFFICER
Stephen A. Wooderson
swooderson@rehabnetwork.org

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Office of Information & Regulatory Affairs
Attn: OMB Desk Officer for DOL-ODEP
Office of Management & Budget
Room 10235, 725 17th Street, N.W.
Washington, DC 20503

This proposal goes beyond policy and includes a focus on practice. We first suggest looking internally to the federal government for existing information. There have been grants funded to look at this information, for example those through the NIDDLR in HHS as well as technical assistance centers and business roundtables sponsored by RSA in the Department of Education. The GAO is also completing a similar study and this survey would seem to be contraindicated by the President's directive to eliminate duplication and improve efficiency in government.

There are other excellent resources available from other federal workforce partners and we recommend engagement with the US Department of Education, Rehabilitation Services Administration (RSA), as well as the US Department of Labor, Office of Disability Employment Policy (ODEP). ODEP already shares helpful information, but they also work with other partners at the national, state and local level that serve candidates with disabilities and business. That would seem to be a rich source of information.

The Council of State Administrators of Vocational Rehabilitation (CSAVR) has a robust history in working directly with business through the National Employment Team (NET). The NET was built with business – by listening to the needs of business customers and building a team as well as services to meet those needs. This cross state team focuses on the priority for business - to hire and retain qualified talent while running an efficient and effective business. Rather than asking business to take time from their operations, reach out to the CSAVR-NET and other related organizations to learn from our expertise in the field. Build a tool together and don't duplicate efforts, especially for business.

If alignment of the workforce system is the goal of WIOA--- work in alignment with each partner having an equal voice at the table in developing a survey. Include those that are working with both customers at the national, state and local level. That voice of experience is important to all of the workforce partners and those customers we serve. VR and the CSAVR-NET bring a unique expertise to this partnership with a system that directly serves both individuals with disabilities and business at the national, state and local level.

Best Regards,

A handwritten signature in black ink, appearing to read "Steve Wooderson". The signature is fluid and cursive, with the first name "Steve" written in a smaller, more compact script than the last name "Wooderson".

Steve Wooderson, CEO
CSAVR

Cc: US DOL-OASAM
Office of the Chief Information
Attn: Dept Information Compliance Management Program
DOL_PRA_PUBLIC@dol.gov