



IVRS Public Meeting 10/10/2024

Question and Answer

Q: Four commenters asked if master's level Rehabilitation Counselors, or other positions within IVRS, would receive a pay increase. One commenter inquired about the benefits package available to master's level Rehabilitation Counselor and another commenter asked whether master's level Rehabilitation Counselors would be compensated for training and professional development of coworkers.

A: The IVRS budget does not support pay increases across the board for an already established expectation of positions within the agency. Additionally, IVRS does not have the ability to personalize the benefits package offered to its employees. The agency must follow the State of Iowa's compensation and benefits package. Individuals of all classifications are called on occasionally to assist in the professional development of new staff. Mentoring new staff is a long-standing philosophy of IVRS.

Q: One commenter inquired about the minimum level of experience of individuals in the Rehabilitation Counselor classification.

A: IVRS is aligning the minimum level of experience with the requirements outlined in the federal regulations, 34 CFR 361.18(c).

Q: One commenter asked about recruiting previous employees who have left the agency.

A: All IVRS Rehabilitation Counselor positions are posted and open for recruitment from anyone who meets the minimum qualifications to apply, including former employees who may be interested in returning to IVRS. Positions are posted on the Iowa Department of Administrative Services website at governmentjobs.com/careers/iowa.

Q: One commenter asked about employee benefits to further education. Two commenters inquired about CRC credentialing. One commenter questioned the Rehabilitation Counselor's responsibility to the professional code of conduct, legislation, and court orders.

A: IVRS maintains an internal policy related to professional development, credentialing, and further education. This opportunity has been open to all full-time IVRS employees who meet the guidelines. In addition, the Rehabilitation Services Administration (RSA) offers a grant opportunity that allows individuals across the nation to complete a Rehabilitation Counseling master's degree free of charge. The CRC is not a requirement to work in the Rehabilitation Counselor classification within IVRS, therefore, IVRS does not reimburse staff for this credential. However, IVRS recognizes the value of the CRC credential, and therefore allows work time to be utilized for attendance at professional organization meetings with supervisor approval. It has been the long-standing practice of IVRS to hold all staff to the ethical standards outlined in the CRC code of ethics. In addition, all staff are required to follow all applicable Federal and State legislation and regulations. IVRS maintains a policy on Hearings and



Appeals. The policy requires staff at every level to seek out the assistance of the staff attorney in these circumstances.

Q: Two commenters shared statements indicating that individuals promoted internally within the IVRS agency perform excellent work.

A: IVRS appreciates the comments in support of the proposed change of the minimum qualifications.

Q: One commenter inquired about the process for current Rehabilitation Associates who do not meet the new minimum qualifications established by the Iowa Department of Administrative Services.

A: The Rehabilitation Associate position will remain open for current employees in that classification. No Rehabilitation Associate is being forced to apply for the Rehabilitation Counselor positions.

Q: One commenter outlined the training standards used in other states and the supervision of newly hired Rehabilitation Counselors. Another commenter inquired about whether IVRS would include ethics training to newly hired or promoted Rehabilitation Counselors. A third commenter requested information as to whether suicidal ideation would be included within the training plan.

A: IVRS follows the State of Iowa's policies on probationary employees for all newly hired and promoted employees. IVRS has a responsibility to ensure that personnel have specialized training and experience that enables them to work effectively with individuals with disabilities to assist them to achieve competitive integrated employment. The regulations require IVRS to ensure that IVRS maintains a system of staff development for Rehabilitation professionals based on the specific needs of the agency (34 CFR 361.18(d)). This is why the IVRS training team is establishing a training plan to ensure that this requirement is met for newly hired and newly promoted Rehabilitation Counselors. It has always been the responsibility of the Rehabilitation Supervisor to provide local training to new staff that compliments the training provided by the IVRS training team. This practice will continue. IVRS has provided ethics training through various methods and entities, including offering CEUs for this training. These trainings are open to all staff members to participate in. IVRS intends to continue this practice. Additionally, IVRS holds a policy on emergency procedures that all staff are expected to abide by. This policy includes situations that may arise, such as suicidal ideation. IVRS supports staff attendance at specific trainings necessary to perform job duties, based on the established internal training policy.

Q: Two commenters asked whether IVRS will notify current clients of the changes in the minimum qualifications.

A: The minimum qualifications for the Rehabilitation Counselor position have included a standard for individuals with a bachelor's degree, minimum hours from a master's level program, and the appropriate experience. As a result, many clients have already established relationships with Rehabilitation Counselors who have a bachelor's degree.



Q: Three commenters inquired about the research and decision-making process the IVRS Executive Team utilized in making this decision.

A: IVRS engaged in a thorough analysis prior to making the decision to lower the minimum qualifications of the Rehabilitation Counselor job description, including consultation with the Iowa Department of Administrative Services and the Iowa Workforce Development Human Resources team, discussion with other State vocational rehabilitation programs, and conversations with the Rehabilitation Services Administration. IVRS understands that much research has been conducted on the pros and cons of the education level of the Rehabilitation Counselor. However, ultimately, the IVRS Executive Team had to weigh the reality of a lack of qualified applicants and our inability to fill Rehabilitation Counselor positions to make this decision. To ensure that IVRS is adequately compensating Rehabilitation Counselors with additional experience, IVRS plans to continue to use pay adjustment and Advanced Appointment Rates (AARs), and will implement the following rules related to compensation:

Pay Adjustments for the Policy Change

- Rehabilitation Associates who are promoted to Rehabilitation Counselors through this policy change will be adjusted to the minimum of the Rehabilitation Counselor pay grade, even if this results in a total pay increase exceeding 5%.
- If the Rehabilitation Associate's move to the Rehabilitation Counselor pay grade results in less than 5%, they will receive 5% compensation.
- Rehabilitation Associates who are promoted to Rehabilitation Counselors through this policy change who are already within the salary range will receive a 5% pay increase upon the promotion.

Continued Practice Moving Forward

- Newly hired Rehabilitation Counselors with a bachelor's degree may only be considered for an AAR if they have experience in professional vocational rehabilitation counseling beyond the one-year minimum requirement, up to five years. Other applicants offered the position without this experience will start at the base pay for the Rehabilitation Counselor position.
- Newly hired Rehabilitation Counselors with a bachelor's degree and one year of graduate-level education where 24 semester hours of accredited graduate coursework in a closely related field may be considered for an AAR when they possess vocational rehabilitation counseling experience beyond the one-year minimum requirement, up to five years. Other applicants offered the position without this experience will start at base pay for the classification.
- Newly hired Rehabilitation Counselors with a master's degree in Rehabilitation Counseling or a closely related field will be considered for an AAR for a 5% increase from base pay. An additional increase is only considered for those applicants with vocational rehabilitation counseling or other closely related experience for years of relevant experience up to four years.



- Rehabilitation Counselors with a bachelor's degree who obtain their master's degree in an approved field can apply for an additional salary increase upon the completion of the degree. This would be in the form of a one-time Increased Credentials special pay.
- Newly hired Rehabilitation Counselors with a bachelor's degree will be capped at 85% of the maximum salary for the paygrade.

The IVRS program has a reputation in being a leader in many areas including transition, policy, business services, and supported employment services, including those provided through the Iowa Blueprint for Change project. IVRS intends to maintain the high integrity of professionalism and service delivery regardless of the education level of the Rehabilitation Counselors.

Q: Two commenters referred to bachelor's level Rehabilitation Counselors as "unqualified".

A: IVRS respectfully disagrees with these comments. The qualifications of Rehabilitation Counselors in rehabilitation programs are outlined in the federal regulations. It would be disingenuous to refer to individuals who meet the statutory requirement in the agency's federal regulations as unqualified.

Q: Two commenters asked about the rehabilitation rate and job quality for individuals with a bachelor's level degree versus those with a master's level.

A: Whether in consideration of internal staff or IVRS clients, IVRS recognizes that there are many ways to learn the skills necessary to become a quality employee. Our program demonstrates this by offering and supporting many employment-related training services including post-secondary education, externships, and on-the-job training. Additionally, the State of Iowa, through its classification system, recognized related on-the-job experience as a mechanism to meet minimum qualifications in most job classes. IVRS supports this by recognizing that a bachelor's level employee with related job experience can be considered just as qualified as a master's level employee. The Federal regulations support this decision.

The rehabilitation rate for Rehabilitation Associates for Federal Fiscal Year 2024 was 63%. The agency rehabilitation rate was 46%. Rehabilitation Associates, just like Rehabilitation Counselors, carry caseloads with a mixture of individuals with disabilities from all waiting list categories. This data demonstrates that Rehabilitation Associates provide quality work that results in successful outcomes for individuals with disabilities.

Q: Two comments asked how IVRS intends to evaluate the impact of this decision and the quality of employment outcomes for individuals with the most significant disabilities.

A: Through the IVRS quality improvement process and the State of Iowa's staff evaluation process, the Comprehensive Statewide Needs Assessment, and the work of the State Rehabilitation Council, IVRS continually evaluates and analyzes staff performance, quality of service delivery, and quality of employment outcomes. IVRS is also required to negotiate rates of performance for the WIOA performance indicators. This data is also used to evaluate the program. IVRS supports the Employment First philosophy, and also supports efforts that work towards quality employment for individuals, including individuals with the most significant disabilities. Through the leadership of the Iowa Blueprint for Change initiative, IVRS



communicates and collaborates regularly with other stakeholders through the IBC Collective. These efforts are evaluated, both at the State and national level. Individuals interested in improving the quality of employment outcomes for individuals with the most significant disabilities are welcome to join the IBC Collective by contacting Ashley Banes at Ashley.Banes@iowa.gov.

Q: Two commenters expressed concern that IVRS is creating a “mini master’s program”, which will lead to a potential “mass exodus” of master’s level counselors.

A: As indicated previously, staff development is a requirement within the Federal regulations that IVRS must abide by. IVRS respectfully disagrees that a “mini master’s program” will be developed, as IVRS does not have the ability to confer post-secondary degrees. According to [Bureau of Labor Statistics 2023 wage data](#) and [O*NET](#), IVRS is in the top for [compensation](#) for Rehabilitation Counselors nationwide. Therefore, IVRS does not anticipate a “mass exodus” based on this decision. IVRS contracts with YesLMS, a national provider of education and training for rehabilitation agencies. YesLMS offers training produced by doctorate-level professionals in the field. The coursework is written specifically for State Vocational Rehabilitation Counselors and is described as “highly applicable to anyone working with persons who experience disabling conditions.” This coursework is not meant to replace training offered at institutes of higher education, but rather to meet the required staff development outline in Federal regulations.