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The Council of New York Special Education Administrators (CNYSEA) is a state level affiliate of the national level Council of Administrators of Special Education (CASE) of the Council for Exceptional Children (CEC). CNYSEA represents administrators and educators throughout the state committed to the education of children with disabilities.

We write to provide comments on the provision of vocational services specific to the State Plan for Vocational Rehabilitation and Supported Employment Services.

First, CNYSEA reasserts the following position articulated in prior written comment made regarding the C-DOS Exit Credential:

An additional option for graduation is welcome and seen as a starting point for alternate pathways to a high school diploma for all students. This certificate is manageable for school districts in that it sets forth the minimum requirements while still permitting expansion of coursework and work experiences based on student need. It also allows flexibility in the design and delivery of activities required to adequately prepare students for the world of work, and at the same time provides a framework to identify appropriate work preparation experiences.

Further recommendations regarding Vocational Rehabilitation services include:

- Implement an application process that is streamlined, and expedites services to students.
- Increase the number of available VR counselors to reduce the student to counselor ratio and reduce wait time for services.
- Increase employment opportunities for students.
- Increase transportation opportunities for students to improve their employability.
- There are insufficient opportunities to prepare students with intellectual disabilities who do not qualify for the New York State Alternate Assessment due to the units of study required for graduation. Additional time will be needed for students to meet the work readiness requirements while also preparing for the academic requirements.
- Provide administrative training and guidance to change the strictly academic focus and/or to develop courses that relate to C-DOS standards and career planning.
- Provide funding for students aged 18-21 who may be involved in completing academic work and work readiness requirements.
- Outreach: CNYSEA believes that there is a need for flexibility in time and location of meetings with students and family members. Parents experience limited



transportation systems that hinder their ability to get to certain locations. Additionally, parents who work during the day may find a hardship taking off from work to participate in meetings.

- Regarding transition coordination, CNYSEA supports transition counselors in schools. Additionally, counselors should start meeting with students when they are in the 9th and 10th grades to assist with student planning and the application process for students likely to participate in a CTE or work experience program.
- Encourage increased partnerships with and support of adult service agencies through expanded coordination efforts.
- Include both work and college planning and services when planning for student needs.
- CNYSEA believes that CRS needs to adjust the goal of job placement in 6 months as it is not realistic for most students.
- CNYSEA encourages increased distribution of success stories and outcomes of students so students new to the process might consider it as their goal/ outcome.
- Share fiscal responsibility for eligible SWDs in their final year of HS to provide job development and job shadowing services.
- Support efforts to include fiscal support to LEAs to help SWDs remain in school for 5th year and 6th year programs to complete CDOS AND NYS Diploma requirements.
- Support efforts to include support to LEAs to help SWDs remain in school for 5th year and 6th year programs to complete CDOS AND NYS Diploma requirements by including 6th year SWDs in graduation rates.

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