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Series: Disability Rights Organizations
Subseries:

OA/ID Number: 52055
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Folder Title:
CRCC [Commission on Rehabilitation Counselor Certification] '77 [1976-1977] [1]

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Withdrawal/Redaction Sheet
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Doc. No. / Type	Subject/Title	Date	Restriction	Classification
01a. Minutes	Commission on Rehabilitation Counselor Certification, Executive Committee Meeting [double-sided] (2 pp.)	12/9/75	C	
01b. Minutes	Certification Maintenance Committee [double-sided] (1 pp.)	12/10/77	C	

Collection:

Record Group: Donated Historical Materials
Office:
Series:
Subseries:
WHORM Cat.:
File Location: CRCC [Commission on Rehabilitation Counselor Certification] '77 [1976-1977] [1]

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CORE

COUNCIL ON REHABILITATION EDUCATION, INC.

Suite 1504 520 N. Michigan Ave. Chicago, Illinois 60611 (312) 644-4326

FUNCTIONAL ANALYSIS INSTRUCTION SHEET

FORM 1

The 87 items contained in this form have each been identified as distinct tasks performed in rehabilitation agencies. You are asked to sort each of these 87 tasks into one of the fourteen predetermined functional categories contained on the attached Report Form. The number of each task is to be listed in the column for the functional category to which the task most applies.

Each task is to be listed only in one column. Admittedly, some tasks may be relevant to more than one category. However, you must decide which functional category is most appropriate for each task. There is a column on the form for listing any items which you cannot fit more into one category than another.

The functional sorting you are asked to complete is the first in a series of steps designed to improve the accreditation of rehabilitation counselor education programs by focusing more thoroughly on the functions of graduates and the activities of the educational programs in helping students prepare for those functions.

Since this is but the first step we do need your early attention to this request. Please complete the Report Form and the Demographic Form. Put both in the mail to the CORE office at the above address on or before December 12th.

Thank you for your interest and for your willing cooperation.

CORE

COUNCIL ON REHABILITATION EDUCATION, INC.

Suite 1504 520 N. Michigan Ave. Chicago, Illinois 60611 (312) 644-4326

FUNCTIONAL ANALYSIS DISTRIBUTION LIST

Please return this list to the CORE office right away. Indicate the names and addresses of those to whom you gave the forms. Be sure to indicate which form you are completing and returning yourself!

Thank you.

	Name	Mailing Address
Form 1		
Form 2		
Form 3		
Form 4		
Form 5		
Form 6		
Form 7		
Form 8		

Group A

28. explaining to worker reasons for denying approval of a particular case action.

35. analyzing information in order to prepare a summary report on geographic areas served, number and types of clients, services provided and problems encountered.

58. evaluating a rehabilitation plan with supervisor to test the feasibility and probable consequences of pursuing the plan.

66. choosing an appropriate vocational testing battery for a particular client.

71. determining primary/secondary disability or the dominance of one type of disability over the other.

78. meeting with representatives of college and university rehabilitation programs to plan and coordinate educational or research activities.

83. conferring with liaison personnel at other community service agencies or other involved persons to obtain clarifying information for an eligibility decision.

99. working with community members in developing and implementing programs to improve social, vocational, educational and employment opportunities for the disabled.

103. reading materials pertinent to the evaluation of labor market trends.

113. helping an employed client identify job adjustment problems and develop a course of action to solve them.

145. seeking information to determine a client's conflicts, tensions and anxieties.

153. developing intermediate rehabilitation objectives for a client during a convalescent period.

169. interpreting personality inventories (e.g., Edwards Personality Preference Schedule, etc.).

181. providing a client with employment alternatives based on resource infomation (e.g., D.O.T., Occupational Briefs, Want ads, etc.).

189. determining which (if any) industries in an assigned geographic area have paid openings or on-the-job training positions within the capabilities of clients with specific disabilities.

192. contacting community employment resources to investigate the possibility of placing a client in gainful employment.

193. arranging genetic counseling for a client as recommended by a medical professional.

255. preparing a written summary report on a rehabilitation plan (including outcome and follow-up procedures).

Group B

34. monitoring worker travel itineraries for conformity with agency policy relative to management of time, etc,

41. reviewing worker expense vouchers for conformity with agency expense allowances.

48. consulting with evaluators on methods to assess problems involved in delivering services to rehabilitation clients.

62. reporting to supervisor about caseload size and movement.

95. informing a colleague working in a local office about changes in fiscal reporting procedures, general regulations, etc.

122. obtaining understanding about a client's preferred service(s) and on the respective responsibilities involved in obtaining service(s).

137. providing integrated medical information to the client.

138. making a client aware of alternative community resources.

142. assisting client to budget personal or family finances.

154. reviewing case notes and supportive documentation from transferred case file prepared by agency's worker in order to carry out further rehabilitation activities.

161. assessing the impact of cultural-ethnic and socioeconomic factors on client's vocational goals.

176. administering group intelligence and special aptitude tests (e.g., General Aptitude Test Battery, etc.).

179. advising and directing a client in the establishment of a small business enterprise and supervising the selection and financing of business equipment.

183. providing direct information to a client on an available job opening or on-the-job training program that best suits his/her needs and abilities.

201. referring client to work adjustment center or sheltered workshop.

244. explaining that the agency cannot accept the applicant for services due to the order for selection criterion (viz., severity of disability).

246. providing general information about Trust Fund benefits.

247. evaluating information on application form or other form completed at intake in order to determine if information is sufficient.

272. checking the completeness and organization of file contents.

281. keeping agency manuals and other reference materials current, adding and discarding as necessary.

287. maintaining adequate office supplies and equipment and ordering as necessary.

288. developing an efficient filing system.

289. performing arithmetic operations as necessary for completion of forms relating to work-related expenses, budgets, etc.

Group D

12. designing and promoting the maintenance of an adequate case finding system.

14. designing and periodically evaluating office procedures, clerical assignments, and schedules to maintain office efficiency.

29. conferring with supplemental program personnel to learn about status of special program.

52. self-initiating or participating in agency-initiated research projects.

64. selecting clients to participate in a group counseling situation.

67. determining which is the appropriate agency or community resource to possibly help solve client-family problems.

85. consulting with experts in a particular field, prior to authorizing a training or educational program, to determine potential for final placement of the client in that field.

86. talking with client's creditors to arrange for cooperation with client's plans to resolve financial difficulties.

87. suggesting alternatives available for in-service training to employee and eliciting employee's preference.

124. encouraging modification of an observed client-family relationship, if necessary, to facilitate service delivery to the client.

128. encouraging a client with a specific problem to take a particular course of problem-solving action.

149. eliciting information to determine a client's vocational skills, aptitudes and interests.

163. assessing a client's activities and hobbies and relating them to skills of perception, dexterity, etc.

178. scoring routine aptitude, performance, and interest tests, recording test results, and maintaining test files.

185. talking with a client about preparing for job interviews (e.g., appropriate dress, good grooming, positive attitudes).

188. evaluating job activities in particular positions to determine if any modifications could open the positions to rehabilitation clients (e.g., safety modifications, removal of architectural barriers, etc.).

199. contacting a resource to whom a client is being referred in order to decide about mutual responsibilities regarding a client.

208. referring client for a dental evaluation.

214 maintaining a working relationship with employer groups.

223 preparing a single caseload budget for use during the fiscal year.

254. giving client application form for vocational rehabilitation, explaining purpose, providing instructions and other assistance to help complete form.

Group D continued

269. obtaining bus and train schedule, or other transportation information for a client.

283. separating and routing file folders, forms, etc., within the office, attaching additional materials as necessary.

Group H

7. informing new worker of his/her role and limitations of that role in agency, relationship in other workers and clients, case work procedures, and agency regulations.

15. assigning case to a client services assistant; explaining the immediacy and type of client needs as necessary.

37. reviewing active case files periodically to monitor quality of case recording.

72. evaluating the extent to which a significant person in the client's life may be helpful in resolving a client's problem.

80. consulting with representatives of community agencies in order to provide expertise in relation to the vocational problems of the disabled.

101. participating actively in training conferences and in-service training sessions.

106. providing adjustment counseling, facilitating necessary life changes, etc., to a client (e.g., in dealing with a degenerative disability).

119. negotiating an agreement on alternative services to be provided when a client has been refused a requested service.

121. obtaining understanding regarding the contents of the written rehabilitation plan.

129. persuading client to use needed medication as prescribed.

135. suggesting possible ways that a client may ameliorate or adjust to an identified problem.

160. preparing a summary report, detailing and synthesizing individual's vocational aptitudes/interests, work evaluation report, intelligence, academic achievement, etc.

171. interpreting vocational interest inventories (e.g., Strong-Campbell, Kider, Job Sample Preference Sheet, etc.).

172. interpreting the aptitude tests (e.g., School and College Ability, Differential Aptitude Test, etc.).

177. administering aptitude tests (e.g., School and College Ability Test, Differential Aptitude Test, etc.).

190. negotiating with an individual or organization regarding on-the-job training services for a particular client.

204. referring client to a firm that provides an artificial appliance.

209. referring client for general medical evaluation.

218. providing information regarding agency programs to current and potential referral sources.

227. explaining agency rules and procedures to a client or significant others.

251. providing general information about Social Security benefits.

262. completing a form based on the knowledge and understanding of client's needs.

278. maintaining an efficient and current filing system.

FUNCTIONAL ANALYSIS REPORT FORM

FORM 1

Name of person completing the sorting _____

Please list the number of each task in the appropriate category. Account for all 87 tasks. List each only once.

--------Client oriented tasks----------							Counselor oriented tasks			--Organization oriented tasks----				
1. Interpretation of Medical, Educational, Social, Vocational, Psychological Evaluations	2. Rehabilitation Planning and Case Management	3. Career and Vocational Counseling	4. Personal and Social Counseling	5. Job Development and Placement	6. Utilization of Community Resources	7. Recording and Reporting	8. Administration and Supervision	9. Professional and Staff Development	10. Contributions to the Profession	11. Community Organization Planning and Consultation	12. Manpower Planning and Forecasting	13. Agency Planning and Program Development	14. Other	Use this column for tasks that cannot be assigned to the 14 functional categories

FORM 1

FUNCTIONAL ANALYSIS DEMOGRAPHIC FORM

(please circle the appropriate responses)

Please indicate one category which best represents your work or the majority of your functions:

1. Administration.
2. Supervision of services at top agency level.
3. Supervision of services at middle agency level.
4. Rehabilitation services for clients (counseling).
5. Staff development activities.
6. Rehabilitation education.
7. Client evaluation.
8. Disability determination (OASI - SSI).
9. Job development and placement.
10. Other. Please specify below:

What is the primary source of funding in your organization?

1. state/federal VR agency.
2. federal public agency.
3. state public agency.
4. regional (multi-state) public agency.
5. county/multi-county public agency.
6. municipal public agency.
7. private agency.

What are the characteristics of the population density of your work setting?

1. rural: farm, small community (less than 5,000).
2. Suburban: outer city (5,000 - 50,000).
3. Urban: city (50,000 and more).

Years of experience in all types of counseling or personnel work:

1. less than 1.
2. 1 to 2.
3. 3 to 4.
4. 5 to 6.
5. 7 to 8.
6. 9 to 10.
7. 11 to 12.
8. 13 to 14.
9. 15 to 16.
10. 17 or more. How many?_____

Years of experience as a rehabilitation counselor:

1. less than 1.
2. 1 to 2.
3. 3 to 4.
4. 5 to 6.
5. 7 to 8.
6. 9 to 10.
7. 11 to 12.
8. 13 to 14.
9. 15 to 16.
10. 17 or more. How many?_____

Please indicate the number of years of education which best describes yourself:

1. High School Graduate - G.E.D.
2. High School Graduate - Diploma.
3. Bachelors Degree.
4. Bachelors Degree plus.
5. Masters Degree.
6. Masters Degree plus.
7. Ed. Specialist.
8. Ph.d , Ed.d.
9. M.D. , D.O.

Name of person completing the sorting of tasks_____

CERTIFICATION MAINTENANCE FEE

The fee each Certified Rehabilitation Counselor will be asked to pay for Certification Maintenance has been computed on the following basis:

Application Processing (Includes meetings of the Certification Maintenance Committee; development of forms; printing; staff time for receipt, review and follow-up of applications; related postage and telephone costs; and a seal to be affixed to the Commission's certificate).	$15.00
Annual Mailing in October to Certified Rehabilitation Counselors to disseminate information and verify addresses.	$10.00
Preparation and Printing in September of an annual record of continuing education for each Certified Rehabilitation Counselor. (Copies requested at other times will be made available at cost).	$ 5.00
Preparation of the annual Registry of Certified Rehabilitation Counselors. (Copies of the Registry will be made available on a limited basis at cost).	$ 4.00
Annual updating of Certified Rehabilitation Counselors' continuing education record, address, etc. in the data bank of the Commission	$ 3.00
Miscellaneous expenses of the Certification Maintenance Program.	$ 2.00
Support of the Commission and the Certification process.	$11.00
TOTAL	$50.00

This fee is due on the fifth anniversary of the Certified Rehabilitation Counselor's certification. It is estimated that this fee will pay for services provided the Counselor for the succeeding five years.

LN/9/13/77



PLAN OF CERTIFICATION MAINTENANCE

Adopted

September 11, 1977

by the

Commission on Rehabilitation Counselor Certification
520 North Michigan Avenue
Suite 1504
Chicago, Illinois 60611

I. INTRODUCTION

In the belief that rehabilitation counselors should continue to demonstrate their competence to deliver quality rehabilitation counseling services to the public, the Commission on Rehabilitation Counselor Certification, in 1974, endorsed the principle of Certification Maintenance. Certification Maintenance is meant to maintain and enhance the ability of the Certified Rehabilitation Counselor to serve clients. This report sets forth the principles of the plan of Certification Maintenance based on continuing education, but includes options for those who find it impossible to participate in continuing education activities to the extent recommended.

Objectives of the Certification Maintenance plan for Certified Rehabilitation Counselors include:

A. Obtaining Current Information,

B. Exploring New Knowledge in a Specific Content Area,

C. Mastering New Skills and Techniques,

D. Expanding the Approaches Toward the Management of Clients, and

E. Developing Critical Inquiry and Balanced Professional Judgment.

II. METHODS/OPTIONS

A. Continuing Education

Should the Certified Rehabilitation Counselor choose continuing education as the method of Certification Maintenance, 150 contact hours would be required in a period of five years.

The effective date for beginning Certification Maintenance is January 1, 1978. Continuing education completed prior to that date will not be accepted for Certification Maintenance. In order to distribute the work load for administering the Certification Maintenance program, each Certified Rehabilitation Counselor will submit his/her application for Certification Maintenance on the first day of the month in which his/her fifth anniversary of the certification occurs, and each subsequent fifth year

anniversary. The number of contact hours required would be pro-rated as follows:

Date Certified	Deadline for Certification Maintenance	Contact Hours Required
July 19, 1974	July 1, 1969	45
October 15, 1974	October 1, 1979	52 1/2
March 22, 1975	March 1, 1980	65
July 18, 1975	July 1, 1980	75
October 11, 1975	October 1, 1980	82 1/2
April 10, 1976	April 1, 1981	97 1/2
September 17, 1976	September 1, 1981	110
April 23, 1977	April 1, 1982	127 1/2
October 28, 1977	October 1, 1982	142 1/2
After January 1, 1978		150

A Certified Rehabilitation Counselor will have ninety days following the deadline for his/her Certification Maintenance to submit an application. If certification is not maintained, a counselor will not be listed in the Registry of Certified Rehabilitation Counselors, and will be officially notified that he/she may no longer exercise the rights and privileges ascribed to a Certified Rehabilitation Counselor. Reinstatement will be through the regular applicant/examination process under the standards then in force.

The Commission believes that continuing education programs are available in sufficient number and at reasonable or no cost to meet the requirements for Certification Maintenance through continuing education without personal hardship. It was determined that the following sources are examples of continuing education that could be used:

1. Regional Rehabilitation Continuing Education Programs
2. In-Service Education Programs
3. Research and Training Programs
4. College and University Courses
5. Member Organization Approved Programs - Workshops and Seminars

In addition, the Commission recognizes that there may be other programs and alternate forms of continuing education or ways to demonstrate that a counselor has maintained his/her competence in serving clients. The member organizations of the Commission are encouraged to develop alternative plans which would be in the best interest of their members and submit them to the Commission for approval. Such plans should include the relationship between the Commission's plan and the alternative, the monitoring process and the method for evaluation.

B. Examination

Should the Certified Rehabilitation Counselor be unable to meet the Certification Maintenance requirements through continuing education or an alternative plan developed by a member organization and approved by the Commission, he/she may sit for the certification examination when it is offered during the year prior to his/her deadline for Certification Maintenance.

A counselor electing this alternative must pass the examination at the level of those completing it for initial certification. If the examination is failed, the Commission will consider that the counselor has not maintained his/her certificate and the counselor will not be listed in the Registry of Certified Rehabilitation Counselors, and will be officially notified that he/she may no longer exercise the rights and privileges ascribed to a Certified Rehabilitation Counselor. Reinstatement will be through the regular application/examination process under the standards then in force.

III. APPROVAL OF CONTINUING EDUCATION PROGRAMS

A. Purpose

The purpose of the approval process for continuing education programs is to maintain a high quality of continuing education opportunities that will extend expertise in the professional practice of rehabilitation counseling. Approval of programs may be sought by an institution, agency or organization; an instructor; or a Certified Rehabilitation Counselor.

B. Guidelines

1. Each member organization will be encouraged to establish mechanisms to grant approval for continuing education programs to be completed for Certification Maintenance under the guidelines established by the Commission. In order to assure that Certification Maintenance will be established for all Certified Rehabilitation Counselors, following the time-line recommended by the Commission, the Commission will also implement an approval process.

2. As of January 1, 1979 each member organization will be asked to submit a list of programs approved in accordance with the guidelines to the Commission.

3. The Commission will monitor the approval process implemented by member organizations and will reserve the right to withdraw approval privileges from any whose processes it deems inadequate.

4. One contact hour is defined as equivalent to one clock hour spent in an approved program. (Excluded: Coffee breaks, social hours, luncheons/dinners, etc.). Fifteen contact hours will be allowed for one semester credit, ten contact hours will be allowed for one quarter credit in a college or university program.

5. For approval, continuing education programs should be no less than 3 1/2 contact hours in duration and include an evaluation component. In addition, contact hours are to be reported to the nearest half hour.

6. Courses for credit*, offered by a college or unviersity accredited by a regional accrediting body, which are germane to one or more of the content areas noted below need not be approved. Questions concerning what is germane should be directed to the Commission.

7. Programs are to be submitted for approval at least 60 days prior to scheduled date(s). Applications for approval must include:

   a. Course Title
   b. Program Focus
   c. Learner Objectives
   d. Dates and Length of Course
   e. Participants - Who? and How Many?
   f. Program Director
   g. Evaluation Component
   h. Method of Instruction
   i. Sponsor(s)
   j. Location **

8. Program focus must be to increase the knowledge or skill in the practice of rehabilitation counseling in one or more of the following areas:

   a. Rehabilitation Philosophy, History, Structure and Laws.
   b. Medical Aspects of Disability.
   c. Psychological Aspects of the Handicapping Condition.
   d. Occupational Information and the World of Work.
   e. Counseling Theory and Techniques.
   f. Community Organization and Resources.
   g. Placement Processes and Job Development.
   h. Psychology of Personal and Vocational Adjustment.
   i. Evaluation and Assessment.
   j. Ability to Utilize Research Findings and Professional Publications.
   k. The Delivery of Rehabilitation Services.

9. The purpose of the program should be clearly defined in terms of expected outcomes.

C. Effective Date

All continuing education programs taken for Certification Maintenance credit after January 1, 1979, must be approved by the Commission or one of its member organizations. Programs taken during the calendar year 1978 need not be approved, though the Commission requests that counselors and

---

* For the purpose of Certification Maintenance, credit is considered to be semester or quarter hours not Continuing Education Units (CEU's).

** Programs and locations are to be accessible; that is, no disabled person will be excluded from any educational program. (Reference: Section 504 of the Rehabilitation Act of 1973 as amended).

trainers adhere to the guidelines of the Commission during this initial year as it studies the process and works to establish the approval mechanism.

V. FEES

A. Certification Maintenance - Fifty ($50) for a period of five years at the time the counselor submits his/her Certification Maintenance application for review.

The total Certification Maintenance fee is to be paid at the time the Certification Maintenance application is submitted. $35 of this fee will be refunded to a counselor who does not maintain his/her certificate.

B. Program Approval

Fifteen Dollars ($15) will be charged per program for each application for approval submitted to the Commission. Member organizations will be required to charge the same fee though they may waive it for programs they or their members sponsor.

C. Monitoring the Approval Process

Three Dollars ($3) will be charged a member organization for each program approved by that organization. Charges will be based on the list of approved programs submitted by the member organization to the Commission.

D. Changes

Fees are subject to change based on cost and inflationary factors with one year prior notice.

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

REPORT

CERTIFICATION EXAMINATION

APRIL 23, 1977

Prepared by

Natresources, Inc.
520 N. Michigan Ave.
Chicago, Illinois 60611

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B: "Another Point of View on Rehabilitation Certification"
C: Examination Site List
D: Candidate Profile

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION REPORT
APRIL EXAMINATION ADMINISTRATION

Introduction

The third pass/fail Certification Examination of the Commission on Rehabilitation Counselor Certification was administered on April 23, 1977 to 270 candidates.

The purpose of this report is to describe the content, the administrative procedures and the statistical performance of that examination, and the performance of the candidates who sat for certification.

Description of the Examination

The pass/fail examination was composed of 240 items plus 60 items which were being field tested. Those items were selected to represent the field of rehabilitation counseling. Content areas included: (1) type of client, (2) handicapping condition, (3) knowledge required, (4) services provided, and (5) measurement objectives or cognitive skill level (recall, interpretive skills, problem solving and judgement). Since this examination was designed to be a "practice - based" measure, a large percentage of the items were problem orientated. Based upon the classification suggested by the authors, items were classified into each of the five content areas specified above. (see Classification Guide, Appendix A). Table 1 presents the names of the subtest and the number of items which were assigned to each subtest before and after deleting the field test items.

The examination was administered in two sections. The first section was administered in the morning and it contained 120 exam items plus 30 field test items for a total of 150 items. The items were equally distributed over the content areas. The second section of 120 items, plus 30 field test items equally distributed over the content areas, was administered in the afternoon. It should be noted that some counselors may have preceived the content of this examination to be different from actuallity (See Appendix B). Table 1 shows that the examination contained only 31 items pertaining to the deaf and 29 items pertaining to the blind before deletion of the field test items. The pass/fail examination, however, contained only 39 items (16% of examination) pertaining to either deaf or blind clients, since 21 items were being field tested. Therefore, candidates were provided the opportunity to demonstrate their knowledge in many content areas at different times of the day and at different levels of anxiety and fatigue.

TABLE 1

NUMBER OF ITEMS IN EACH SUBTEST BEFORE AND AFTER DELETION OF FIELD TEST ITEMS

SUBTEST NAME	BEFORE DELETION OF FIELD TEST ITEMS	AFTER DELETION
Child	34	31
Adult	156	126
Aged	7	5
Physical Disability	30	27
Social Deviants	34	31
Emotional Disorders	28	22
Mental Retardation	31	27
Deaf	31	21
Blind	29	18
Medical Aspects of Disability	63	46
Occupational Information	30	28
Counseling Theory	23	21
Counseling Methods	33	29
Community Organizations	15	14
Vocational Adjustment	55	50
Evaluation & Assessment	27	21
Research Utilization	17	14
Rehabilitation Planning	35	30
Case Management	34	25
Information Dissemination	31	26
Vocational Counseling	26	15
Personal Adjustment Counseling	40	36
Group Counseling	20	19
Job Development	19	13
Vocational Assessment	42	34
Recall	68	57
Interpretive Skills	60	49
Problem Solving	131	108
Judgment	41	26
Total Examination	300	240

FIELD TEST

The Field Test was administered at the same time as the Certification Examination. Sixty items, covering a variety of areas of rehabilitation counseling, which had not been tested in their present form, were included in the field test. Thirty of these items were placed randomly throughout Section I and the other thirty were placed randomly throughout Section II.

Candidates were NOT scored on the field test items. Subsequently, the items have been studied for possible inclusion in a future examination or determination of the necessary revisions. The performance of the field test items did NOT influence the candidates' scores. The only purpose of the Field Test is continued refinement and development of the item pool available for the construction of examinations.

Demographic Questionaire

At each site candidates were asked to complete the Demographic Questionnaire. The demographic answer sheets will be computer scored, and the demographic information within the form will be tabulated, keypunched, and put on computer tape. The project is being conducted by Roger Livingston who is now associated with the University of Nebraska.

Examination Sites

The examination was administered at ten sites. A commissioner and/or a member of the Natresources staff monitored each examination site. The site list may be found in Appendix C.

Prescore Analysis

Following the examination, the answer sheets were checked in and prepared for computer scoring. The answer sheets were scanned and the first computer analysis (the prescore) was completed. The purpose of a prescore is to study the performance of items so that those which do not meet the criteria set for good performance may be deleted; thus, candidates are not penalized for poorly performing items.

The prescore analysis was completed using candidates selected on the basis of their education and work experience, who were sitting for this examination for the first time. The following four groups were chosen as being representative of practicing rehabilitation counselors:

Group	Cand. #	Group Definition
1)	92	Master's in Rehabilitation Counseling/Rehab. Services for clients (counseling).
2)	31	Master's in Rehabilitation Counseling/Supervision of services at top and middle agency levels.
3)	27	Master's in Guidance and Counseling/Rehab. Services for clients (counseling).
4)	15	Master's in Guidance and Counseling/Supervision of services at top and middle agency levels.
	165	Total

The prescore was run using the 165 candidates who comprized all four groups. The results of the prescore run for each subtest included in this examination are reported in Table II.

This table compares the performance of the prescore group in two ways: first, at the time of the initial scoring, before any items were deleted or rekeyed; second, after deletion of field test items and rekeying. Therefore, it can be seen that the effect of deleting the field test items and rekeying miskeyed items raised the average performance 11.88% (from 55.21 to 67.09).

Table 11

Means and Standard Deviation

Prescore Group

N = 165

Subtest Name	Before Deletion of Field Test Items		After Deletion	
	% Means	% S. D.	% Means	% S.D.
Child	60.18	8.31	68.99	9.13
Adult	54.58	5.25	66.98	6.42
Aged	55.67	14.94	69.82	18.69
Physical Disability	66.71	8.53	71.85	9.43
Social Deviants	56.70	8.69	69.50	10.19
Emotional Disorders	59.39	9.16	67.38	10.81
Mental Retardation	56.30	8.18	62.31	8.80
Deaf	55.46	8.71	68.72	11.20
Blind	43.99	9.98	69.26	12.19
Medical Aspects of Disability	48.82	6.69	67.08	8.74
Occupational Information	60.63	8.63	71.69	9.83
Counseling Theory	64.53	10.15	68.37	10.78
Counseling Methods	49.99	7.78	66.19	9.86
Community Organizations	54.42	12.80	61.99	14.37
Vocational Adjustment	57.83	6.56	66.29	7.33
Evaluation & Assessment	58.00	8.78	69.93	10.07
Research Utilization	56.90	12.99	62.08	14.64
Rehabilitation Planning	52.85	7.75	66.77	9.34
Case Management	55.31	7.36	68.82	8.92
Information Dissemination	60.37	9.26	72.84	10.51
Vocational Counseling	44.62	8.92	65.09	13.73
Personal Adjustment Counseling	56.32	8.18	64.56	9.08
Group Counseling	53.03	10.54	63.13	12.61
Job Development	61.21	10.55	74.64	12.23
Vocational Assessment	53.20	7.75	64.33	9.32
Recall	62.13	7.60	70.60	8.68
Interpretive Skills	56.55	8.05	66.11	9.07
Problem Solving	55.09	5.19	67.04	6.45
Judgement	42.17	7.11	61.42	9.61
Total Examination	55.21	4.96	67.09	6.12

TABLE III

DISTRIBUTION OF ITEMS BY DIFFICULTY LEVEL

DIFFICULTY	# OF ITEMS
.30 - .39	16
.40 - .44	13
.45 - .49	9
.50 - .54	24
.55 - .59	25
.60 - .64	23
.64 - .69	16
.70 - .74	19
.75 - .79	24
.80 - .84	17
.84 - .89	24
.90 - .94	19
.95 - .99	11

Table III shows the distribution of items by difficulty level (proportion responding to best answer). The 38 items with difficulty levels less than .50, were retained in the examination because candidates who did poorly on the examination as a whole did poorly on these and candidates who did well on the examination as a whole did well on them. In other words, they discriminated well within the examination. We have found, however, while working with other boards that there are no absolutes especially in the measurement objective areas of interpretive skills, problem solving and judgment. In these areas, weighting distractors has proved to be an effective means of allowing for the widest possible latitude with in a profession where institutional and regional differences occur frequently, while at the same time reflecting a best answer upon which there is general consensus by experts in the field.

Scoring And Analysis

The Minimum Pass Level (MPL) was established during discussion with Mr. Nattress, Ms. Crumpton and Dr. McAlees after a thorough study of items performance. The Commission has previously recommended a MPL of 70.0. Since the MPL is operationally defined as one standard deviation below the mean; a MPL of 70.0 would require an average performance level of between 76 and 78. The current item pool, however, does not support the development of that type of examination if we are to continue to include the full breadth of content areas covered by Rehabilitation Counseling. This examination, then was designed to cover a wide range of content areas as shown in Table I and to obtain an average performance level of 70.0. The prescore group, however, obtained a mean score of 67.1 (Table III), which fell 2.9 points below the anticipated level of 70.0. In order to determine the significance of this lower score, we studied the item statistics of all items used in this examination which were used with no editorial changes from previous examinations. This study showed that all of these items performed an average of 1.5 points below their previous performance levels, indicating that the difference between the expected and actual mean score was indicative of the group taking this examination, rather than with the examination itself. The MPL, of 62.5 for this examination was derived by dropping the mean score by one standard deviation (67.1 - 6.1 = 61.0) and then adding 1.5 points to compensate for the lower performance level of this group.

Table IV shows the examination statistics for the total group after deletion of field test items and rekeying. This mean for the total group was 66.25 which is slightly less than our prescore group. The reliability (internal consistancy) for this examination was .82 which compares favorably with a reliability of .85 for the September 1976 examination.

Table IV

Means And Standard Deviations After Deletion Of Field Test Items

Total Group

N = 269

Subtest	Percent Means	Percent S. D.
Child	68.92	9.09
Adult	65.92	7.07
Aged	71.00	18.87
Physical Disability	72.12	9.77
Social Deviants	68.16	10.46
Emotional Disorders	65.61	11.90
Mental Retardation	62.10	9.28
Deaf	68.99	11.03
Blind	68.22	12.18
Medical Aspects of Disability	66.41	8.69
Occupational Information	70.99	10.25
Counseling Theory	67.69	11.82
Counseling Methods	65.47	10.35
Community Organizations	61.92	13.75
Vocational Adjustment	65.21	7.88
Evaluation & Assessment	68.97	11.22
Research Utilization	60.09	15.25
Rehabilitation Planning	65.86	9.73
Case Management	68.80	9.49
Information Dissemination	71.66	11.15
Vocational Counseling	64.39	13.91
Personal Adjustment Counseling	63.55	9.20
Group Counseling	62.86	12.20
Job Development	72.66	13.70
Vocational Assessment	63.49	10.25
Recall	69.80	8.97
Interpretive Skill	65.00	9.45
Problem Solving	66.32	7.06
Judgement	60.51	9.73
Total Examination	66.25	6.65

NEW JERSEY SITE

A number of complaints were received from candidates sitting for the examination at the New Jersey site. These complaints centered around poor lighting and a noisy test environment. In order to determine the effect these problems may have had on the performance of the candidates, a special computer run was made to compare the scores of the New Jersey candidates to the scores for all candidates. The results of this analysis are found in Table V. This table shows that there was no significant variation in performance levels for those candidates who sat at the New Jersey site. However, in order to insure fairness, Mr. Nattress had recommended that all candidates who sat at the New Jersey site and who failed the examination will be eligible to sit free of charge for the October 1977 examination.

EXAMINATION RESULTS

In April, 1977, 270 candidates sat for the Certification Examination, one candidate took the Spanish translation and her examination was scored by hand. Of the 270 candidates, 210 passed the examination and 60 failed the examination. In terms of percent, 77.8 passed and 22.2 failed the examination as compared with 88.0 who passed and 12.0 who failed the previous examination. All candidates were sent a profile of their examination results (Appendix D), containing the number of items in each subtest, the mean scores and the candidates' scores for all subject areas. The measurement objective area (recall, interpretive skills, problem solving and judgment) is used as an internal measurement device which does not contribute to the evaluation by the candidate of his performance; therefore, it was not included on the profile.

CONCLUSIONS AND RECOMMENDATIONS

The candidates sitting for the third Rehabilitation Counselor Certification Examination performed at a lower level than expected. Perhaps there were a higher number of recent graduates in this group who had the minimum supervised experience necessary to meet the criteria of the Credentials Committee while the candidates completing the first two certification examinations were more experienced counselors. This difference in the population is significant enough to warrant further investigation to determine whether or not the bias of the examination is in fact toward experienced counselors. If that is indeed the case, it is fair to conclude that less experienced candidates would not do as well, thereby accounting for the drop in the mean score and the corresponding increase in the failure rate.

Table V

Comparison of New Jersey Site With Total Group

Subtest	N = 269 Total Group % Mean	% S.D.	N = 89 New Jersey % Mean	% S. D.
Child	68.92	9.09	68.97	9.35
Adult	65.92	7.07	65.90	6.19
Aged	71.00	18.87	72.58	16.89
Physical Disability	72.12	9.77	72.24	9.77
Social Deviants	68.16	10.46	67.52	9.25
Emotional Disorders	65.61	11.90	66.96	10.27
Mental Retardation	62.10	9.28	62.26	9.14
Deaf	68.99	11.03	68.54	11.59
Blind	68.22	12.18	67.17	13.44
Medical Aspects of Disability	66.41	8.69	66.68	8.98
Occupational Information	70.99	10.25	70.43	9.25
Counseling Theory	67.69	11.82	68.70	12.10
Counseling Methods	65.47	10.35	66.29	8.22
Coummunity Organizations	61.92	13.75	64.61	11.39
Vocational Adjustment	65.21	7.88	65.30	7.40
Evaluation & Assessment	68.97	11.22	70.09	10.33
Research Utilization	60.09	15.25	61.08	13.87
Rehabilitation Planning	65.86	9.73	65.58	9.11
Case Management	68.80	9.49	68.99	8.74
Information Dissemination	71.66	11.15	70.40	9.61
Vocational Counseling	64.39	13.91	62.55	14.37
Personal Adjustment Counseling	63.55	9.20	63.89	9.48
Group Counseling	62.86	12.20	65.23	11.21
Job Development	72.66	13.70	73.03	12.82
Vocational Assessment	63.49	10.25	64.74	8.93
Recall	69.80	8.97	69.94	8.74
Interpretive Skill	65.00	9.45	65.08	9.23
Problem Solving	66.32	7.06	66.87	6.22
Judgement	60.51	9.73	61.32	9.46
Total Examination	66.25	6.65	66.63	5.70

Regardless of differences in the population of counselors completing the examination, the quality of the examination must be maintained. To do this there must be more involvement and input from the Examinations Committee. Since this is the primary function of the Commission and where it is visible to the profession, the examination must be of the highest quality. Because other concerns have had higher priority little attention has been given to the examination for two years. Thus, we have voids in the item pool. A meeting of the Examinations Committee is a necessity this year followed by a workshop to revise old and write new items. At the same time, the references should be evaluated and up-dated and the content guide reviewed.

APPENDIX A

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION
CONTENT CLASSIFICATION GUIDE
DEVELOPED APRIL 28, 1975

I. CLIENT
- A. Child
  - 1. Preadolescent
  - 2. Adolescent 13-18
- B. Adult
  - 1. Young 19-39
  - 2. Middle aged 40-59
- C. Aged 60+
- D. General
- E. Not applicable

II. SETTING
- A. Rural
- B. Suburban
- C. Urban
- D. General
- E. Not applicable

III. HANDICAPPING CONDITION
- A. Physical disability
- B. Social deviants
  - 1. Addiction
  - 2. Public offenders
- C. Emotional disorders
- D. Mental retardation
- E. Deaf
- F. Blind
- G. Bicultural
- H. Neurologically impaired (L.D.)
- I. Other or general
- J. Not applicable

IV. KNOWLEDGE REQUIRED
- A. Rehabilitation philosophy, history and structure
- B. Medical and psycho-social aspects of disability

IV. KNOWLEDGE REQUIRED (Continued)
- C. Occupational information and the world of work
- D. Counseling theory
- E. Counseling methods
- F. Community organizations and resources
- G. Psychology of personal and vocational adjustment
- H. Evaluation and assessment
- I. Research utilization
- J. Other
- K. Not applicable

V. SERVICES PROVIDED
- A. Rehabilitation planning
- B. Case management (Coordination)
- C. Information dissemination
- D. Vocational counseling
- E. Personal adjustment counseling
- F. Group counseling
- G. Job development and placement
- H. Vocational and psychblogical assessment
- I. Staff development
- J. Supervision
- K. Other
- L. Not applicable

VI. MEASUREMENT OBJECTIVE
- A. Recall of factual information
- B. Interpretation of data (Problem identification)
- C. Problem solving
- D. Judgement

APPENDIX B -

ANOTHER POINT OF VIEW ON COUNSELOR CERTIFICATION

"This test isn't even relevant to what I do as VRS counselor." This test is stupid, I don't know any of that stuff, and never need to use it." This is silly, did you know any of the answers?" "What the hell is going on here?"

These were some of the comments made by the participants of the recent CRCC exam in Omaha on April 23, 1977. It was during the lunch break between the A.M. and P.M. portions of the certification test, the participants were mostly VRS counselors from South Dakota, Iowa, Nebraska, and Kansas. We had just sat through three hours of frustration and futility, struggling through the A.M. session of the test. We were complaining about the relevancy of the test, a so-called national exam for the certification of Rehabilitation Counselors. So far the test had not been a test of Counselor competencies, but a test on the deaf and blind handicaps and services to them. We were complaining about the fact that most of our respective agencies are specialized. That certain counselors within each organization handle only the deaf, or the blind, or the mentally retarded, or the workman's compensation cases; in other words we have specialized ourselves in certain areas to facilitate client services and have seemed to specialize ourselves right out of National Accreditation. It appeared that at least 60% of the questions dealt explicitly with the deaf and blind, and that the majority of the counselors present had had minimal contact with a deaf client and absolutely no contact with a blind client. I would hazard a guess, that unless you worked for the Division of the Visually Impaired, you would never have a blind client on your case load; not only in this state, but the other states that were being represented. We tried to discuss this with the proctor, a member of the commission, but he refused to respond to our inquiries. The remaining 40% of the questions were at least relevant to the majority of the counselors present, but very subjective in nature. The questions were the "What would you do" type, with multiple guess answers and computer scored. Some were common sense, but others were directly related to a Manual of Operating Procedures and Federal Laws and procedures. This was fine and dandy for making up the test, but each state agency has different MOP's and interprets the Federal Regs differently. Workman's Compensation is different from state to state, yet the exam had explicit questions dealing with explicit compensation policies.

APPENDIX B

Some of the academic questions were right out of some obscure text book, questions like: "What was the main result of Peterson's Counselor efficiency study of 1947?", with five multiple guess answers to choose from. The proctor advised us to keep the test secret, but I don't know why; you couldn't study for it anyway.

Now the real question "Do we really want National Counselor certification and accreditation?" There has been talk about using Certification as a basis for a Counselor III position, or merit raises, or other types of incentives to acquire Certification, but why? I feel that this whole idea of National Accreditation is being pushed on counselors out of a misguided sense of professionalism, and not with the individual counselor's interest or the client's interest in mind. I feel that the whole system and idea should be re-evaluated much more closely by the various counselor organizations, certification for the few is a real bummer.

If the various organizations do not want to do this, then I suggest that we blow the exam by having pre-test sessions to prepare the counselor to take the exam; much like other organizations do that have National exams to take. Sixty dollars is a lot of money to spend for a shot in the dark. But, if nothing is done, and the test is not made more relevant, and counselors insist on taking the test, then borrow some handbooks from fellow counselors with the Division of the Visually Impaired and services for the Deaf, to insure completion of at least 60% of the exam.

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Published in the Nebraska Newsletter

Appendix C

Examination Site List

Site Location	Monitor	Scheduled Participants
Los Angeles, California	Florence Curnutt	52
Chicago, Illinois	Natresources Staff	37
Baltimore, Maryland	Dorothy Clifford	21
Detroit, Michigan	Natresources Staff	25
Jacksonville, Flordia	Anne Crumpton	17
Jersey City, New Jersey	Daniel Smith	96
Omaha, Nebraska	Roger Livingsten	18
Austin, Texas	Carl Hanson	10
Seattle, Washington	Gerald Redler	12
New York	Harold Rubin	2

There were 290 scheduled participants. Of these 20 were no shows.

APPENDIX D

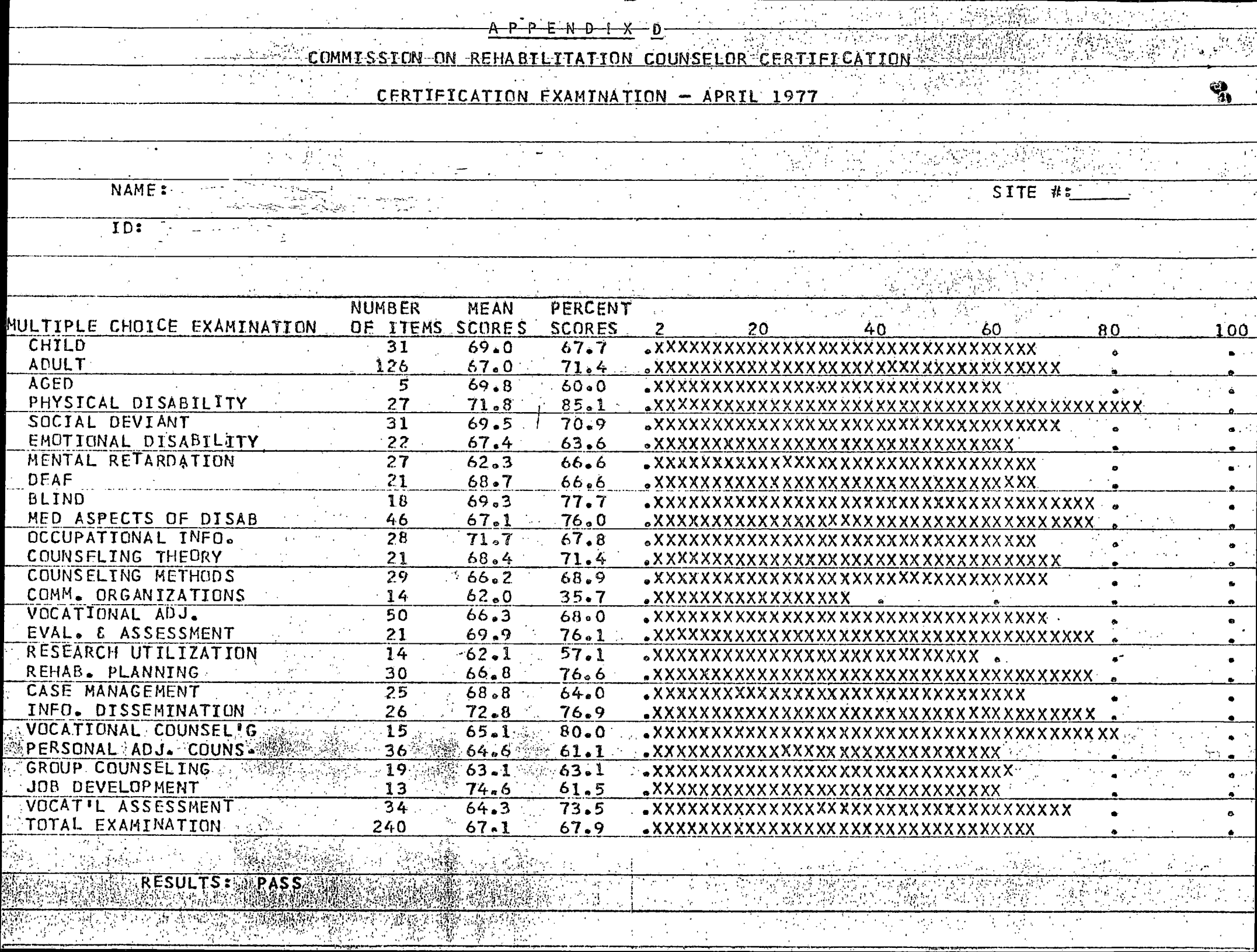
COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

CERTIFICATION EXAMINATION – APRIL 1977

NAME: SITE #:

ID:

MULTIPLE CHOICE EXAMINATION	NUMBER OF ITEMS	MEAN SCORES	PERCENT SCORES
CHILD	31	69.0	67.7
ADULT	126	67.0	71.4
AGED	5	69.8	60.0
PHYSICAL DISABILITY	27	71.8	85.1
SOCIAL DEVIANT	31	69.5	70.9
EMOTIONAL DISABILITY	22	67.4	63.6
MENTAL RETARDATION	27	62.3	66.6
DEAF	21	68.7	66.6
BLIND	18	69.3	77.7
MED ASPECTS OF DISAB	46	67.1	76.0
OCCUPATIONAL INFO.	28	71.7	67.8
COUNSELING THEORY	21	68.4	71.4
COUNSELING METHODS	29	66.2	68.9
COMM. ORGANIZATIONS	14	62.0	35.7
VOCATIONAL ADJ.	50	66.3	68.0
EVAL. & ASSESSMENT	21	69.9	76.1
RESEARCH UTILIZATION	14	62.1	57.1
REHAB. PLANNING	30	66.8	76.6
CASE MANAGEMENT	25	68.8	64.0
INFO. DISSEMINATION	26	72.8	76.9
VOCATIONAL COUNSEL'G	15	65.1	80.0
PERSONAL ADJ. COUNS.	36	64.6	61.1
GROUP COUNSELING	19	63.1	63.1
JOB DEVELOPMENT	13	74.6	61.5
VOCAT'L ASSESSMENT	34	64.3	73.5
TOTAL EXAMINATION	240	67.1	67.9



RESULTS: PASS

FRIDAY, JUNE 3, 1977
PART III

THE NATIONAL ARCHIVES OF THE UNITED STATES
1934

federal register

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Health Care Financing Administration

INTERMEDIATE CARE FACILITIES FOR THE MENTALLY RETARDED

Final Regulations

Title 45—Public Welfare

CHAPTER II—SOCIAL AND REHABILITATION SERVICE (ASSISTANCE PROGRAMS), DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

PART 249—SERVICES AND PAYMENT IN MEDICAL ASSISTANCE PROGRAMS

Intermediate Care Facilities for the Mentally Retarded

AGENCY: Health Care Financing Administration, HEW.

ACTION: Final rule.

SUMMARY: The rules prescribe State procedures effective July 18, 1977 for certifying Intermediate Care Facilities for the Mentally Retarded to participate in State Medicaid programs (title XIX, Social Security Act). A study completed in July 1976 by the HEW Office of Long Term Care indicated that only 35 percent of State-owned facilities were expected to be in full compliance with standards by the deadline (March 18, 1977, now July). These regulations modify certain Federal requirements and allow an extension of time to meet selected standards.

EFFECTIVE DATE: July 18, 1977.

FOR FURTHER INFORMATION CONTACT:

Richard C. Davison, 202–245–0136.

SUPPLEMENTARY INFORMATION: On January 18, 1977, HEW published a proposed rule (42 FR 3325) to modify Federal regulations applicable to intermediate care facilities for the mentally retarded which would otherwise become effective on March 18, 1977. The purpose of the proposed rule was to modify certain requirements and to extend the period allowed under regulations for compliance with standards on staffing and environmental conditions.

Comments on the Notice, both pro and con, raised serious questions with respect to the impact of the proposed amendments on the current operations of State programs for the mentally retarded, as well as on Federal and State actions to achieve deinstitutionalization. In order to assure a thorough analysis of all of the issues involved, HEW issued a final rule on March 18, 1977 extending the deadline for meeting Federal regulations to July 18, 1977.

A wide variety of comments were received on the January Notice from State health and welfare agencies, consumer groups, social service agencies, the National Association of Retarded Citizens, professional organizations, the National Governors' Conference and private citizens. All of these comments have been reviewed and HEW's final decisions are discussed below.

DISCUSSION OF MAJOR COMMENTS

CERTIFICATION OF NEW FACILITIES

Regulations published in January 1974 established a March 18, 1977 (now July 1977) deadline for compliance with Federal standards applicable to institutions for the mentally retarded. Facilities were permitted to receive Medicaid payments in the interim if they had an acceptable plan (§ 249.33(a)(8) for meeting the standards by the 1977 deadline.

The January 1977 proposed rules revised several of the standards and provided an additional period (one year for staffing and three years for environmental standards) for compliance for those facilities certified under the program and already participating under an approved plan of compliance. The proposed rules would not have allowed this additional time for new facilities entering the program after March 18.

Several comments received questioned the legality of such a distinction. In addition, it has been pointed out that the proposed rule, in effect, rewards facilities which have remained out of compliance since 1974 by providing them even more time to meet requirements, and penalizes facilities which have never been afforded an opportunity to work with Federal financial assistance towards compliance with Federal standards.

After careful consideration of all of the views presented on both sides of the issue, HEW has decided, in the interest of equity, that all facilities certified on or after the effective date of the regulations will be subject to the same terms and conditions concerning certification with deficiencies.

Thus, the following rules will apply regardless of the date on which the facility enters the program:

Any facility certified on or after July 18, 1977 with deficiencies in Federal requirements for staffing may be given a period not to exceed July 18, 1978 for correction of the deficiency.

A facility certified on or after July 18, 1977 with deficiencies in the Life Safety Code or certain environmental standards may be given a period not to exceed July 18, 1980 for the correction of the deficiencies.

Under certain conditions, the Secretary may grant the State authority to approve a plan of correction beyond July 18, 1980 but not to exceed July 18, 1982.

APPROVAL OF PLANS OF CORRECTION

Proposed amendments to 45 CFR 249.33(a)(2) provided that facilities could be certified with deficiencies in staffing, the Life Safety Code or certain environmental standards if they had a plan of correction approved by the Secretary.

Many comments objected to the introduction of Federal determinations into a process which by statute is interpreted as a State function and authority.

HEW agrees, in essence, with the comments that the authority for determining whether institutions meet the requirements for participation in Medicaid rests with the State. Accordingly, § 249.33(a)(2) has been revised to provide State survey agencies with the authority to approve plans for correction of deficiencies in staffing, the Life Safety Code and environmental standards. An exception in the area of the Life Safety Code and environmental standards has been provided, however; States must obtain the Secretary's authorization for approval of any plan of correction that exceeds the Federal deadline. This will be granted on a facility-by-facility basis since a specific determination must be made that the deficiency can be corrected and that the plan is feasible. HEW considers this special approval action necessary to assure that such situations are kept to a minimum and that an extension is essential and appropriate in the individual case.

In this connection, HEW wishes to stress its commitment close monitoring of the State survey and certification of institutions for the mentally retarded to assure State compliance with the conditions for facility participation in the program. HEW will give particular attention to State approval of plans of correction and State findings on facility progress. Under the Federal validation authority provided in § 249.10(b)(15)(vi)(C), HEW will initiate fiscal disallowance actions, in any case where the State has failed to make the required determinations (§ 249.33(a)(2)(ii)(C)) with respect to substantial facility progress in its plan of correction. Under the Federal authority available, such disallowances would be effective from the date the State failed to meet the requirements of § 249.33(a)(2)(ii)(C).

STAFFING REQUIREMENTS

The proposed revision to 45 CFR 249.33(a)(2) provided for the correction of staffing deficiencies under an approved plan of correction not exceeding one year from the effective date of certification after publication of the regulations.

Several commentors requested that a two-year period be provided for correction and several comments recommended that the one-year correction period should begin with the date of the revised regulations (i.e., July 18, 1977) rather than the date of recertification after publication of the regulations.

HEW has concluded that one year is considered sufficient time for a facility to recruit the necessary staff and is also the maximum period that a facility should attempt to provide the required "active treatment" short of a full complement of staff. HEW believes a longer period could result in harm to the residents or at least deter their progress toward maximum normal functioning.

Accordingly, the final rule has been amended to provide for the correction of staffing deficiencies under a State-approved plan not exceeding one year (i.e., July 18, 1978) from the effective date of the regulations. It is recommended, therefore, that State survey agencies alert those facilities currently participating under the program and not scheduled for certification until early 1978 or later, that they will also be subject to the July 18, 1978 deadline for any staffing deficiencies noted during the resurvey.

HEW has also accepted a recommendation that approved correction plans must also document that financial resources are available to provide the staff indicated in the plan.

LIFE SAFETY CODE AND ENVIRONMENTAL REQUIREMENTS

Proposed revisions to 45 CFR 239.33(a)(2) provided for certification of a facility with deficiencies in Federal requirements for the Life Safety Code, living units, dining rooms and therapy areas if the facility had a plan of correction assuring that the facility would meet these requirements during a period not to exceed March 18, 1980. The plans of correction were to include a timetable for either phasing out the institution or for taking corrective steps, specifying when correction would be completed. During this period the facility would be surveyed at least semi-annually to assure adequate progress in meeting its plan of correction.

Many comments were received, both pro and con, concerning the proposed extension of the period allowed for these corrections. Some commenters recommended no extension, others recommended an extension of one year. While the consensus of the comments supported HEW's proposed extension of three years, several comments were also received supporting an extension, where appropriate, of five years. Some comments also objected to the proposed semi-annual surveys as unnecessary.

As HEW stated at the time, the proposed regulations were intended to alleviate the serious difficulties States are encountering in their efforts to meet Federal requirements by the 1977 deadline and to permit continued participation of facilities for a reasonable time while improvements are being made. This will avoid substantial disruption in the care, treatment and living arrangements of residents that would result from their transfer to other certified facilities. The residents will not be disadvantaged by the change, since the extended time may be granted only when an approved plan of correction is in effect and no harm will result to the individual. HEW will closely monitor State activities to assure compliance with the Federal conditions for approval of extension periods.

HEW is aware of the complexities and difficulties in developing plans of correction in the area of the Life Safety Code and environment. Therefore, the final rule provides that in the case of a facility certified on or after the effective date of these regulations, it may be certified with deficiencies in the Life Safety Code and certain environmental standards if the facility has a State-approved plan of correction which assures compliance as of July 18, 1980.

At the time of the initial survey after July 18, 1977, where a facility is unable to develop an approvable plan which assures compliance by July 18, 1980, the survey agency may request authority from the Secretary to approve an individual plan of correction which assures compliance during a period not exceeding July 18, 1982.

Therefore, all facilities, certified on or after July 18, 1977 with deficiencies in the Life Safety Code or certain environmental standards, must be certified at that time under either (a) plans of correction that do not exceed July 18, 1980; or (b) with Secretarial approval, plans that do not exceed July 18, 1982.

State requests for exemption from the plan of correction deadline of July 18, 1980 can be approved by the Secretary where he has determined that the additional time is necessary as a practical matter to prevent unreasonable hardship to the facility and to assure the continuity of care for individuals served by the program. HEW criteria for the determination of "unreasonable hardship" are set forth under section 5020 of the HEW Regional Director's Long Term Care Manual and include such factors as the estimated cost of corrections, availability of financing and the remaining useful life of the building.

HEW does not agree that semi-annual State progress reports on the extended plans of correction are unnecessary. Such reports are viewed as essential if HEW is to meet its commitment that Federal funds be made available only to those facilities which are in fact taking adequate steps toward compliance with Federal standards. In an effort to underscore this Federal intent, the final rule has been clarified to indicate that progress determinations must be made by the State survey agency within six months of the initial approval of the plan and within every six months thereafter. Special efforts should be made, therefore, by survey agencies to schedule at least one of the six-month progress surveys so that it coincides with general overall yearly on-site surveys.

RESIDENTS PER ROOM

The proposed revision of 45 CFR 249.13(b)(6)(i)(C) provided that variances to the limitation of four residents per room could not exceed eight residents. In addition, the survey agency would have to document a rejustification of the variation each quarter.

A wide variety of comments were received. Some favored a four to a room requirement with no allowed variances while others favored a variance provision with no Federal numerical restrictions. In addition, many comments recommended annual rather than quarterly variance rejustifications. Several comments also indicated that restrictive Federal requirements on number of residents per room pose a serious threat to the care and safety of non-ambulatory residents where direct visual surveillance by staff is of major importance.

After considering the comments received, HEW has concluded that an arbitrary numerical limitation on the number of residents would be overly restrictive and pose a serious hardship on the States as well as on certain types of individuals, e.g. the severely handicapped, those in pediatric wards.

Therefore, HEW has modified Federal requirements to provide that the survey agency may grant a variance where it has made a determination that a physician or a psychologist has justified in the individual's plan of care that assignment to a bedroom of more than 4 residents meets the individual resident's program needs and that the health or safety of the resident is not adversely affected.

As part of HEW's concern with the needs of individuals rather than abstract numerial limitations, annual independent professional review teams will be expected to place particular emphasis on assuring that room assignments are in accordance with the programmatic needs of each individual. The final regulations also correct a technical error in the proposed rules by clarifying that extended time frames (i.e. until 1980 or 1982) for the plans of correction apply to resident bedroom deficiencies (e.g. four residents per room).

BEDROOM SQUARE FOOTAGE

HEW's proposed revision of 45 CFR 249.13(b)(6)(i)(D) provided for variances in the 80/100 square footage requirements for ambulatory resident bedrooms if this would not adversely affect the individual's program needs and goals. The variances would be restricted to not less than 60 square feet per resident in multiple bedrooms and not less than 80 square feet per resident in single bedrooms.

Comments generally supported these requirements for ambulatory residents of not less than 60 or 80 square feet. Many commentors recommended allowing these variances for non-ambulatory residents. Some also recommended that variances to the 80/100 square footage requirement be permitted only in facilities of 15 beds or less where other areas are available for resident use. Concern was also expressed that square footage variances not be permitted where more than four residents share a bedroom. There was a general consensus among the comments that greater emphasis be directed on assuring the adequacy of space outside of the bedroom where residents spend the major portion of the waking day. Several comments requested HEW clarification of the definition of "bedroom", space between beds and other various aspects related to the application of Federal requirements for resident bedrooms.

While HEW endorses and recommends wherever possible the higher square footage provisions of 80 and 100 square feet for all resident bedrooms, it has decided that, for purposes of the Medicaid program and Federal efforts to establish minimal acceptable standards, the 60 and 80 square footage requirements shall apply for all resident bedrooms. This provision is consistent with standards established by Joint Commission on the Accreditation of Hospitals.

In addition, it is expected that this modification to the requirements for bedroom square footage will provide additional flexibility and incentives to facilities to increase the size of the areas provided for resident living activities, where the residents spend the major portion of the waking day.

Consistent with this approach, special emphasis will be directed in the Federally-sponsored surveyor training programs on increasing surveyor skills in

providing consultation to facilities and in the application of Federal requirements concerning adequate and appropriate resident living and program space (i.e., 45 CFR 149.13 (b) and (c)).

HEW instructions to the State survey agencies will also clarify those related areas which have been identified by commenters as a source of confusion or misinterpretation.

WATER TEMPERATURE

Current Federal regulations under 45 CFR 249.13(b)(6)(xi) provide that the hot water temperature at all taps to which residents have access must be controlled so that it does not exceed 110 degrees Fahrenheit. A substantial number of comments requested clarification of the water temperature rule as related to resident training programs in the use of hot water taps (e.g., where residents are being prepared to make trips or to live outside).

HEW has therefore modified these regulations to clarify that hot water taps must be thermostatically controlled not to exceed 110 degrees, except that variances may be permitted in supervised areas where residents are being trained in the use and control of hot water.

QUALIFIED MENTAL RETARDATION SPECIALIST

The proposed revision to 45 CFR 249.12(c)(3) expanded the definition of a "qualified mental retardation specialist" (QMRP) to include a rehabilitation counselor certified by the Committee on Rehabilitation Counselor Certification who has specialized training or one year of experience in treating the mentally retarded.

Comments recommended that: (a) the definition be further expanded to include individuals with degrees in sociology and other related fields, licensed nursing home administrators and practical nurses with three years' experience in mental retardation; (b) the qualifications of a QMRP be determined by State certification processes approved by the Secretary; and (c) the QMRP qualification for social workers include experience under the supervision of a QMRP as well as under a social worker.

HEW feels that further expansion of the definition or qualification methods for a QMRP could not be justified at this time without further detailed study, which will be undertaken at a later date.

SELF-PRESERVATION REQUIREMENT FOR RESIDENTS IN FACILITIES OF 15 BEDS OR LESS

The proposed revision to § 249.12(a)(5)(i) provided for mobile non-ambulatory as well as ambulatory residents to be housed in facilities of 15 beds or less and provided an exception to the requirement that the residents must be certified as capable of self-preservation. This exception allowed the application of the Lodging or Rooming House section of the Life Safety Code in facilities of 15 beds or less housing non-certified residents if the Secretary determined that the facility had an adequate 24-hour evacuation plan.

HEW agrees with the consensus of the comments received that the proposed revision would not adequately ensure the safety of ambulatory or mobile non-ambulatory residents determined incapable of self-preservation.

Therefore, HEW has awarded a grant to the National Bureau of Standards to develop a more rational approach to the Life Safety requirements for small facilities housing the developmentally disabled. Pending results of this grant, HEW will continue to enforce current requirements under § 249.12(a)(5) that residents in facilities of 15 beds or less must be certified as ambulatory and capable of self-preservation.

MISCELLANEOUS COMMENTS

HEW has considered the following suggestions but does not agree that the regulation would be improved or the objectives of the program served if they were accepted: (1) That the regulations issued in January 1974 and effective now on July 18, 1977 be enforced without change or modification;

(2) That new admissions be allowed in facilities under a plan for phasing out;

(3) That the concept of "good faith effort" be incorporated as a basis for continued approval of plans of correction.

The first suggestion would result in cutoff of Federal funds to a significant number of facilities that are progressing toward full compliance with requirements and that provide an adequate level of care to Medicaid recipients. This cutoff could result in lowering the quality of care or even ending any public responsibility for providing care where States are unable to assume the full monetary burden. On the other hand, allowing the additional time periods assures continuity of care for the retarded during the interim and satisfactory progress to full compliance by a specified date.

Allowing new admissions in buildings being phased out would be contradictory to the intent of the plan and could result in continued delays in making other arrangements for care, to the detriment of all of the residents.

Because of its vagueness, "good faith effort" is a very difficult regulatory concept to enforce. HEW believes a specific requirement for documented findings is more easily understood and readily accepted.

COMMENTS BEYOND SCOPE

A number of comments were received that were beyond the scope of the Notice. They included recommendations for: (1) A HEW policy on community-based programs;

(2) Waiver of the American National Standards Institute standards in facilities not serving the physically handicapped;

(3) HEW designation of a person or unit that would coordinate the program and have authority to act on policy matters and the administration and interpretation of the regulations;

(4) Regulation revision which would replace numeric standards with performance-based measures;

(5) Review and update of Federal regulations every two years;

(6) Establishment of two levels of care for the mentally retarded;

(7) The modification and revision of various sections and interpretations of the Life Safety Code.

In addition to those comments falling outside of the scope of the Notice, a wide variety of comments requested clarification of the interpretation and application of many of the standards. Special note has been made of these comments and questions and will be incorporated in subsequent guidelines issued by HEW.

Accordingly, Part 249, Chapter II, Title 45, Code of Federal Regulations, is amended as follows:

1. Section 249.12 is amended by amending paragraph (c)(3), as set forth below:

§ 249.12 Standards for intermediate care facilities.

(a) The standards for an intermediate care facility (as defined in § 249.10(b)(15) of this part) which are specified by the Secretary pursuant to section 1905(c) and (d) of the Social Security Act and are applicable to all intermediate care facilities are as follows. The facility: * * *

* * * * * *

(c) In addition, for institutions for the mentally retarded or persons with related conditions, the following standards specified pursuant to section 1905(d) of the Social Security Act shall apply. * * *

(3) The institution provides for a Qualified Mental Retardation Professional who is responsible for supervising the implementation of each resident's individual plan of care, integrating the various aspects of the institution's program, recording each resident's progress and initiating periodic review of each individual plan of care for necessary modifications or adjustments. The term "Qualified Mental Retardation Professional" means: * * *

(ix) A rehabilitation counselor who is certified by the Committee on Rehabilitation Counselor Certification and who has specialized training or one-year of experience in treating the mentally retarded.

* * * * * *

2. Section 249.13 is amended by revising paragraph (b)(6), as set forth below:

§ 249.13 Standards for intermeditae care facility services in institutions for the mentally retarded or persons with related conditions.

Effective July 18, 1977, the standards for intermediate care facility services (as defined in § 249.10(b)(15)) in an institution for the mentally retarded or persons with related conditions, which are specified by the Secretary pursuant to section 1905 (c) and (d) of the Social Security Act and referred to in § 249.12(c)(6), are specified in this section. At such time as an institution is deemed to meet the standards contained in this section, such institution will no longer be required to meet the following provisions of § 249.12: (a)(1)(i), (ii)(A), (iv), (v) and (vi); (a)

(4); (a) (6) (i) (B), (iii), (v), (vi), (vii) and (viii); (a) (7); (a) (8); (c) (4); and (c) (5).

* * * * *

(b) *Resident living.* * * *

(6) *Design and equipage of living units.* (i) Bedrooms shall:

(A) Be on or above street grade level;

(B) Be outside rooms;

(C) Accommodate no more than 4 residents. However, the survey agency may grant, under certain conditions, a variance from this limitation for the period of a specific certification. A variance may be granted where the survey agency has made a finding, as part of the survey record, that a physician or psychologist (as defined in § 249.12(c)(3)(i)) had justified in each affected resident's plan of care that assignment to a bedroom of more than 4 residents is in accordance with the particular programmatic needs of the individual and that the variance does not adversely affect the health or safety of the individuals; and

(D) Provide at least 60 square feet per resident in multiple sleeping rooms, and not less than 80 square feet per resident in single rooms.

* * * * *

(xi) The temperature of the hot water at all taps to which residents have access shall be controlled by the use of thermostatically controlled mixing valves or by other means, so that it does not exceed 110 degrees Fahrenheit. However, the survey agency may grant, as part of the survey record, a variance to this requirement where it is required in supervised areas to train residents in the use and control of hot water.

* * * * *

3. Section 249.33 is amended by revising paragraphs (a)(2), (a)(4)(iii), (iv) and (5)(iv) as set forth below and by revoking paragraph (a)(8).

§ 249.33. Standards for payment for skilled nursing and intermediate care facility services.

(a) *State plan requirements.* A State plan for medical assistance under title XIX of the Social Security Act must: * * *

(2) Provide that the single State agency will, prior to execution of an agreement with any facility (including hospitals and skilled nursing facilities) for provision of intermediate care facility services and making payments under the plan, obtain certification from the agency designated pursuant to § 250.100(c) of this chapter that the facility meets the definition set forth under § 249.10(b)(15). However, (i) An intermediate care facility (other than an institution for the mentally retarded) deficient under environment and sanitation (§ 249.12(a)(6)) or the Life Safety Code (§ 249.12(a)(5)) may be certified in accordance with paragraph (a)(4)(iii) of this section for a period not exceeding 2 years following the date of certification provided that:

(A) The institution submits a written plan of correction acceptable to the survey agency which contains:

(*1*) The specific steps that it will take to meet these requirements; and

(*2*) A timetable not exceeding 2 years from the date of the initial certification of the facility for participation as an intermediate care facility detailing the corrective steps to be taken and when correction of deficiencies will be accomplished;

(B) The survey agency finds that the facility potentially can meet such requirements through the corrective steps and they can be completed during the 2 year allowable period of time;

(C) During the period allowed for corrections, the institution is determined to be in compliance with State fire safety and sanitation codes and regulations;

(D) The survey agency, on the basis of on-site surveys conducted by qualified surveyors, finds as part of the survey record that the facility has in fact made substantial progress in meeting its plan for correction. These findings must be made within six months after the initial approval of the plan and within every six months thereafter. The findings must be supported in the record by signed contracts, work orders, or other documentation; and

(E) At the completion of the period allowed for corrections, the intermediate care facility is in full compliance with the Life Safety Code requirements set forth under § 249.12(a)(5), and the requirements for environment and sanitation set forth under § 249.12(a)(6), except for any provisions waived in accordance with § 249.12;

(ii) An institution for the mentally retarded (or distinct part thereof) determined on or after July 18, 1977, to have deficiencies in staffing (§ 249.13(b)(5)), the Life Safety Code (§ 249.12(a)(5)); living units (§ 249.13(b)(6)(i); (ii)(D); (iii), (iv), (v), (vii), (viii), (ix) and (xii)); dining rooms (§ 249.13(c)(4)(viii)); or therapy areas (§ 249.13(c)(8)(vi)), may be certified in accordance with paragraph (a)(4)(iii)(A) of this section *Provided*, That:

(A) Prior to certification, on or after July 18, 1977, a written plan of correction has been approved in writing by the survey agency which details the extent of the institution's current compliance with such requirements and the specific action steps that it will take to meet all such requirements. Such plans must:

(*1*) In the case of public institutions, be approved by the State or political subdivision having jurisdiction over the operation of the facility; and

(2) In the case of a facility determined to have deficiencies under the requirements for staffing (§ 249.13(b)(5)), establish a timetable for completion of necessary action steps for correction of staffing deficiencies by July 18, 1978. Such plan must include the number, job titles, and qualifications of personnel employed by the facility and arrangements for recruiting and training additionally required personnel sufficient to insure that each resident participates in an effective program of active treatment. The plan must also include documented evidence of the availability of sufficient financial resources to complete correction of staffing deficiencies; and

(3) In the case of a facility determined to have deficiencies under the requirements for the Life Safety Code (§ 249.12(a)(5)), living units (§ 249.13(b)(6)(i); (ii)(D); (iii), (iv), (v), (vii), (viii), (ix) and (xii)); dining rooms (§ 249.13(c)(4)(viii)), or therapy areas (§ 249.13(c)(8)(vi)), provide assurance that the facility will meet such requirements during a period not to exceed July 18, 1980. If at the time of first survey, on or after July 18, 1977, a facility is unable to develop a plan of correction which assures compliance by July 18, 1980, the survey agency may request from the Secretary an exception to this limitation with respect to each deficiency. He may authorize the survey agency to approve a specific plan of correction for a period not exceeding July 18, 1982, where he has determined that additional time is necessary, as a practical matter, to prevent unreasonable hardship to the facility and to assure the continuity of care for individuals served under the program. All approved plans of correction under this subparagraph (3) must include:

(*i*) A timetable detailing the corrective steps to be taken and specifying when correction of deficiencies will be accomplished. The timetable must specify the necessary structural changes and renovations to buildings and provide documented evidence of the availability of sufficient financial resources to complete such changes or renovations on schedule; or

(*ii*) A timetable for the phasing out of the certified institution (or distinct part thereof) which provides for no new title XIX resident admissions to subject buildings (or distinct parts thereof) after approval of the plan. Such timetables must specify the units or buildings to be closed and describe the phase-out action steps and the alternate methods and systems provided in lieu of the full regulatory requirements which will assure the health and safety of the residents until the building is completely phased out.

(B) During the period allowed for correction, the institution is determined to be in compliance with applicable State fire safety and sanitation codes and regulations.

(C) The survey agency, on the basis of on-site surveys conducted by qualified surveyors, finds as part of the survey record that the facility has in fact made substantial progress in meeting its plan for correction. These findings must be made within six months following the initial approval of the plan and within every six months thereafter. The findings must be supported in the record by signed contracts, work orders, or other documentation.

(D) At the completion of the period provided for under plans established under paragraph (a)(2)(ii)(A) of this

section, the institution (or distinct part thereof) has achieved full compliance with such plans and is found in compliance with the requirements for staffing (§ 249.13(b)(5)), the Life Safety Code (§ 249.12(a)(5)), living units (§ 249.13(b)(6)(i); (ii)(D); (iii), (iv), (v), (vii), (viii), (iv) and (xii)); dining rooms (§ 249.13(c)(4)(viii)) and therapy areas (§ 249.13(c)(8)(vi)); except for any provisions waived in accordance with § 249.12(a)(5), and § 249.13(f)(1)(iv) or subject to approved variances under § 249.13(b)(6)(i)(C) and (D);

* * * * * * *

(4) Provide that certification by the survey agency designated pursuant to § 250.100(c) of this chapter will be subject to the following provisions and exclusions: * * *

(iii) In the case of facilities certified under the provisions of paragraph (a)(4)(ii)(A) and (B) of this section certification will be for:

(A) A period that is no later than the 60th day following the end of the time period specified for the correction of deficiencies in a written plan which the survey agency has approved; however in no case may the certification period exceed 12 full calendar months except as provided for under paragraph (a)(2)(i) or (ii) of this section, or * * *

(iv) No second certification under the condition specified in paragraph (a)(4)(ii), except as provided for under paragraphs (a)(2)(i) and (ii)(A)(3), may be executed if:

* * * * * * *

(5) * * *

(iv) perform, with qualified personnel, on-site inspections at least once during the term of a certification and every six months as provided for under paragraphs (a)(2)(i)(D) and (ii)(C) of this section or more frequently if there is a question of compliance.

* * * * * * *

(Sec. 1102, 49 Stat. 647 (42 U.S.C. 1302).)

(Catalog of Federal Domestic Assistance Program No. 13.714 Medical Assistance Program.)

NOTE.—The Health Care Financing Administration has determined that this document does not require preparation of an Inflationary Impact Statement under Executive Order 11821 and OMB Circular A-107.

Dated: May 12, 1977.

DON WORTMAN,
Acting Administrator, Health Care Financing Administration.

Approved: May 21, 1977.

JOSEPH A. CALIFANO, Jr.,
Secretary.

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The Question of Rehabilitation Counselor Certification

Carl E. Hansen, Ed. D.
President-elect

As President-elect of the National Rehabilitation Association, it is clear to me that we must balance our energy between organizational affairs and the broad issues confronting Rehabilitation. For example, membership recruitment, fiscal responsibility, journal policy, inter and intra divisional relationships, etc. are all internal issues of NRA. These are continuing issues that are common to any organization. The intensity or severity of these issues will fluctuate and are often indicators of the health of a given organization. Issues dealing with Rehabilitation legislation, reorganizational plans within state government, consumer advocacy, funding for research, utilization of facilities, etc. are all external to the day-to-day operation of NRA.

The very issues that should concern us the most are the broad consumer, legislative, professional, and funding issues. Each of us, I believe, joined NRA to be able to speak with a unified voice on these critical issues and not to become bogged down with internal organizational affairs. We have become bogged down within NRA on our deliberations of how the organization as a structure will survive and move forward. I am confident at this point in time that the organization is going to survive and move forward with strength and authority. I would like to move away from these internal issues that have been discussed within the pages of this journal and in various newsletters to issues that have overall importance to the field of Rehabilitation.

This editorial page does not allow for an in-depth discussion of all of the critical issues facing us today in Rehabilitation. It would be presumptious of me, anyway, to say that I know all the issues and that I can relate to each issue with intelligence and in-depth ability. I would prefer to use this editorial page, when I have the opportunity, to select one issue in the broad field of Rehabilitation and try and look at it from an objective standpoint. The issue I have selected today is whether or not rehabilitation counselor certification should be supported.

From purely an organizational standpoint our largest division, the National Rehabilitation Counseling Association, enthusiastically supports and endorses counselor certification. In fact, this division was instrumental in getting certification started. The National Rehabilitation Association, again from an organizational standpoint, has endorsed certification and at one time made a loan of $5,000 to the Certification Commission for seed money. That loan, by the way, was paid back to NRA within one year. Aside from the fact that certification has received organizational support from one of our divisions and from the NRA Board, I think it is important for us to discuss the purpose and overall reason why certification exists. The primary purpose of certification is to establish professional standards whereby disabled individuals, related professionals, agency administrators, and the general public can evaluate qualifications of persons practicing rehabilitation counseling. Certification has as its primary impetus the provision of assurances that professionals engaged in rehabilitation counseling will meet acceptable standards of quality and practice.

The certification program is a direct outgrowth of the concern of two professional associations, the National Rehabilitation Counseling Association, and the American Rehabilitation Counseling Association. It was their concern to establish standards and consequently stabilize the field of rehabilitation counseling to provide a baseline for future professional growth. These two associations appointed a joint committee on certification which became an independent incorporated commission. The Commission consists of five appointees from NRCA, five appointees from ARCA, one appointee from the Council on Rehabilitation Education, Council of State Administrators of Vocational Rehabilitation, Association of Rehabilitation Facilities, National Association of Non-White Rehabilitation Workers, Council of Rehabilitation Counselor Educators, and three consumer representatives from the American Coalition of Citizens With Disabilities.

The Commission's intent is not to certify that any individual is suitable for employment or to impose personnel requirements upon an agency, but to establish a national professional scale that any interested group, agency or individual may use as a measure. The Commission hopes that over a period of time that participation by rehabilition counselors would exercise an increasing influence on the field and ultimately guide legislation, personnel practices and training programs.

As I review rehabilitation counselor certification, these points become evident:

1) NRA has endorsed certification.
2) The largest division in NRA energized the movement.
3) Within a short span of time approximately 10,000 individuals have become certified.
4) The Certification Commission has consumer, administrator, counselor, educator, facilities workers, and non-white representatives directing the affairs of the Commission.

I doubt that any single issue has ever captured the attention of the rehabilitation counselor in America more than certification. It has the potential to establish professional standards for the individual that is most immediately involved in the delivery of rehabilitation services to the disabled. I would urge each counselor to seriously consider becoming a certified counselor. I would also urge each rehabilitation agency and administrator to review how certification can become a part of that agency's recruitment, employment, and promotional program.

This editorial page has dealt with only one of many issues facing the rehabilitation movement in America. We can develop all kinds of legislation and all kinds of delivery service approaches, but the final story in rehabilitation is developed between the rehabilitation counselor and the disabled client. I am sure that you would agree with me that the delivery of rehabilitation services in America should be brought about by the most able and qualified counselors.

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

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HIGHLIGHTS OF THE COMMISSION MEETING
DECEMBER, 1976

1. *CONFIRMATION OF APPOINTMENT.* Lawrence J. Deneen, Ph.D. has been appointed to a three year term on the Commission by ARCA. Dorothy Clifford has been appointed by NRCA to fulfill the remainder of George Ebra's term of office.

2. *CONSUMER REPRESENTATION.* The American Coalition of Citizens with Disabilities has been accepted as a member organization of the Commission with the right to appoint three consumer representatives. The newly appointed members of the Commission are: Terrence J. O'Rourke, National Association of the Deaf; Lex Frieden, TIRR, New Options Research; Delbert Aman, J.D., Services to the Visually Handicapped.

3. *CHANGES IN STANDARDS AND CRITERIA.* The Council on Rehabilitation Education now requires that rehabilitation counselor education programs applying for accreditation and the updated accreditation review must have a minimum 600 hour internship experience supervised by a Certified Rehabilitation Counselor. In light of CORE's new requirement, the Commission has adopted a change in the Standards and Criteria for Certification which will become effective for candidates applying *after* January 1, 1978. Graduates with a Master's degree in rehabilitation counseling from an accredited rehabilitation counseling education program will not need to meet a minimum experience requirement. Graduates with a Master's degree in rehabilitation counseling from a non-accredited program will need to meet a two year experience requirement. Pre-Master's and pre-bachelor's experience will be considered as acceptable experience only if supervised by a Certified Rehabilitation Counselor.

   Since candidates applying after January 1, 1977 must submit at least one year of experience under the supervision of a Certified Rehabilitation Counselor, further changes and clarification have been made in the Standards and Criteria. Information and current application forms can be obtained from the Administrative Office of the Commission.

4. *CHANGE IN BYLAWS.* ARCA and NRCA had requested that two additional members, one representing each organization, be appointed to the Commission, representing the practicing counselor. The Commission felt that it was not appropriate or feasible to expand the Commission by two members and voted the following change in Bylaws to maintain a balance of practicing rehabilitation counselors on the Commission. The change in Bylaws fulfills the intent of the ARCA/NRCA request:

   ARTICLE V, Section 2. Representation and Selection of Commissioners.
   "Each member organization shall have the right to nominate one Commissioner, who shall be affiliated with such member organization, with the exception of NRCA and ARCA which shall have the right to appoint five (5) each and ACCD which shall have the right to appoint three (3). The number of Commissioners shall be limited to 18 persons. The majority of Commission members must be practicing counselors at the time of initial appointment. All Commission members shall be CRC's unless the Member Organization can demonstrate that it is impossible to meet this requirement. . ."

5. *GRIEVANCE PROCEDURES.* The Ethical Practices Committee has introduced a draft of a grievance procedure. It covers the procedures to be followed by the Committee in regard to allegations of unethical behavior of a CRC. This draft will be studied by the Commission and its adoption will be voted upon at the next meeting of the full Commission.

6. *FUTURE EXAMINATION DATES.* The Commission is now accepting applications for the next Certification Examination scheduled to be administered on October 28, 1977. The deadline for meeting education and experience requirements and the receipt of applications is July 1, 1977. In 1978, only one Certification Examination will be given. The date remains open at this time, but it will not be held in conjunction with any national rehabilitation conference.

   The Examinations Committee has been charged with contacting member organizations of the Commission and asking them to provide information as to ways in which they could be of assistance in selecting examination sites and qualified monitors. The Committee will also be reviewing examination items to strengthen deficient areas and reviewing the Content Classification Guide to include consumer advocacy, vocational evaluation, and the use of rehabilitation facilities.

7. *CERTIFICATION MAINTENANCE.* The Commission will implement the Certification Maintenance Program in 1979. Individuals who were grandfathered in 1976 will be the first group scheduled for Certification Maintenance. The development of the Certification Maintenance Program will utilize a process that will include any one or all of the following: re-examination, continuing education, practice profiles, references.

   A data-based questionnaire has been distributed to a random group of CRC's to sample test the types and amount of continuing education currently being participated in by CRC's. This data collection procedure will be used to determine minimum standards of continuing education. These minimum standards will be implemented with a view toward increasing the requirements for Certification Maintenance.

   Member organizations of the Commission will be responsible for approval of appropriate continuing education programs. The member organizations will be given a list of criteria that can be used in judging these education programs.

8. *REGISTRY OF CERTIFIED REHABILITATION COUNSELORS .* The Administrative Office reported that 224 candidates participated in the September 1976 Certification Examination. Of this number, 197 obtained certification, bringing the total of CRC's to over 8,500. A Registry of Certified Rehabilitation Counselors is available at a cost of $5.00 prepaid from the Administrative Office. The Registry includes the names of counselors who have been certified up to July 1, 1976. It is anticipated that a supplement to this registry will be published annually.

   The April 23, 1977 Certification Examination will be administered at nine sites across the country. It is anticipated that 300 candidates will participate in this administration of the Examination.

9. *PROMOTIONAL MATERIALS.* The Relationships Committee will be developing promotional materials and informational brochures regarding the certification program. Member organizations will be asked to participate in the development and distribution costs of such materials. The Committee will continue to discuss the issues of consumer involvement in the Certification process.



BYLAWS*

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

Member Organizations

American Coalition of Citizens with Disabilities
American Rehabilitation Counseling Association
Association of Rehabilitation Facilities
Council on Rehabilitation Education
Council of State Administrators for Vocational Rehabilitation
National Association of Non-White Rehabilitation Workers
National Council on Rehabilitation Education **
National Rehabilitation Counseling Association

*Adopted December 7, 1973, Chicago, Illinois
Amended June 13, 1975, Chicago, Illinois
Amended June 4, 1976, Chicago, Illinois
Amended December 13, 1976, Chicago, Illinois .

** Formerly known as Council of Rehabilitation Counselor Educators

ARTICLE I: PURPOSE

This Commission on Rehabilitation Counselor Certification, hereinafter referred to as the "Commission", is organized exclusively for educational and scientific purposes:

A. To establish criteria for the certification of rehabilitation counselors.

B. To conduct programs which will encourage certification and maintain and improve professional standards in rehabilitation counseling.

C. To determine compliance with the criteria for certification.

C. To make available to the public information regarding certification.

E. To assume such other responsibilities, and to conduct such other activities, as are compatible with the operation of a certification program.

No part of the income of the Commission shall be distributable to its members, directors or officers except as permitted by the Non-Profit Corporation Act of the State of Illinois; no member, director or officer of the Commission shall have any right, title or interest in or to any property of any kind owned by it in connection with the performance of its functions nor in or to any income of other funds received by the Commission; no part of the net earnings of the Commission shall inure to the benefit of any private member; no substantial part of the activities of the Commission shall be carrying on propaganda, or otherwise attempting to influence legislation; and the Commission shall not participate in, or intervene in any manner in political campaigns on behalf of any candidate for public office.

ARTICLE II: OFFICES

The Commission shall have and continuously maintain in the State of Illinois an office and registered agent whose office is identical with such registered office. The business office may be within or without the State of Illinois as the Commission may determine.

ARTICLE III: CERTIFICATION PROGRAM

Section 1. Criteria.

The Commission shall establish criteria for the conduct of certification for rehabilitation counseling, which may embody all aspects considered by the Commissioners to be germane to the maintenance of acceptable standards and practice.

Section 2. Procedure.

The Commission shall adopt a uniform evaluation process and a uniform procedure for certification administration.

Section 3. Authority.

The Commission shall have final authority to determine the certification requirements of individuals engaged in the practice of rehabilitation counseling in accordance with the procedures adopted by the Commission.

Section 4. Duration of Certification.

Each certification or re-certification shall be effective until a subsequent action is taken on the certification or re-certification.

Section 5. Revocation of Certification.

Certification may be withdrawn from any previously certified counselor practicing in the field of rehabilitation counseling for cause deemed sufficient by the Commissioners.

Section 6. Appeal.

A practicing rehabilitation counselor who fails to receive initial certification or re-certification, or who has had his/her certification revoked, shall be entitled to appeal in the manner specified in the approved statement of certification procedures.

Section 7. Eligibility.

Requests for certification will be accepted only from counselors who meet the eligibility criteria and standards specified in the approved statement of certification procedures. Applications will be accepted from eligible rehabilitation counselors in the United States, territories thereof, Canada, and United States citizens resident in foreign countries provided arrangements can be made satisfactory to the Commission for the secure administration of the evaluation instrument.

Section 8. Fees.

Certification shall not be contingent upon the payment of any fee other than actual program costs, but certified rehabilitation counselors may be requested to contribute to support the certification program upon the request of the Commission.

ARTICLE IV: MEMBER ORGANIZATIONS

Section 1. Membership.

The Commission shall be composed of representatives from the National Rehabilitation Counseling Association (NRCA), The American Rehabilitation Counseling Association (ARCA), Council on Rehabilitation Education (CORE), Association of Rehabilitation Facilities (ARF), Council of State Administrators for Vocational Rehabilitation (CSAVR), National Association of Non-White Rehabilitation Workers (NANWRW), National Council on Rehabilitation Education (NCRE, as of June 1, 1975)*, and American Coalition of Citizens with Disabilities, Inc. (ACCD, as of December 9, 1976).

*Formerly known as Council of Rehabilitation Counselor Educators

Section 2. Additional Members.

Representatives from additional organizations may be admitted to participation in the Commission upon unanimous written approval of all current member organizations, in which case the name of any such additional organization shall be added to Article IV, Section 1, with an indication of the effective date of such participation.

Section 3. Transfer.

Membership in the Commission is not transferrable or assignable.

ARTICLE V: COMMISSIONERS

Section 1. General Powers.

The affairs of the Commission shall be managed by its Board of Commissioners.

Section 2. Representation and Selection of Commissioners.

Each member organization shall have the right to nominate one Commissioner, who shall be affiliated with such member organization, with the exception of NRCA and ARCA which shall have the right to appoint five (5) each, and ACCD shall have the right to appoint three (3). The number of Commissioners shall be limited to 18 persons. The majority of Commission members must be practicing counselors at the time of initial appointment. All Commission members shall be C.R.C.'s unless the Member Organization can demonstrate that it is impossible to meet this requirement. The chief salaried officers of NRCA and ARCA shall serve as ex-officio members of the Commission without voting privileges but shall be entitled to attend all meetings of the Commission for the purpose of continuity and facilitating implementation and information regarding certification to the constituent bodies represented by these Associations.

All nominations shall be in writing and executed on behalf of the member organization by its President and his/her designate and delivered to the Commission. The Commission shall retain the right to accept or reject the individuals nominated by the member organizations. Should the Commission reject any such nominee, the appropriate member organization shall be so notified in writing by the Chairman, together with the reasons therefor and a request for other nomination(s).

Section 3. Term of Commissioners.

The term of each Commissioner, other than those Commissioners originally appointed in the Articles of Incorporation, shall be for a period of three (3) years. Upon the expiration of a Commissioner's term, the President of the member organization which he/she represents shall nominate his/her successor to a new three (3) year term.

In the event of death, resignation, inability to act or nonqualification of a Commissioner, the President of the member organization which he/she represents shall nominate his/her successor to serve for the unexpired term.

Commissioners shall be eligible to serve a maximum of two (2) successive terms. At least thirty (30) days prior to the expiration of a Commissioner's term, the member organization shall have delivered to the Commission the name of the new Commissioner nominated by said organization.

When a Commissioner fails to attend two consecutive meetings of the Commission and/or its Committees, a review shall be made by the Executive Committee of the situation and if appropriate a recommendation be made to the Commission that the Commissioner be recalled. Under these circumstances a Commissioner may be recalled by a majority vote of the full Commission. The member organization represented by a recalled Commissioner shall be advised of the recall and a nomination requested for the vacancy so created.

Any member organization which feels its representative is not fulfilling his/her responsibility as a Commissioner has the right to request that the Executive Committee review the Commissioner's performance. If appropriate, a recommendation will be made by the Executive Committee to the full Commission that the Commissioner be recalled. The Executive Committee shall be responsible for reporting to the member organization the recommendation that the Commissioner continue on or be recalled from the Commission. If a vacancy is created by this action, the member organization shall be so advised and a nomination requested to fill the vacancy.

Each Commissioner must be a member in good standing of the member organization by which he/she is nominated during his/her tenure on the Commission.

Section 4. Regular Meetings.

There shall be at least one (1) regular meeting of the Commission each year for the purpose of electing officers and transacting such other business as may come before the meeting.

Section 5. Special Meetings.

Special meetings of the Commission may be called by or at the request of the Chairperson of any three (3) Commissioners upon written request to the Chairperson. The person or persons authorized to call special meetings of the Board may fix any place, either within or without the State of Illinois, as the place for holding any meeting called by them.

Section 6. Notice.

Written notice stating the place, day and hour and the business to be transacted shall be delivered by mail to each Commissioner not less than fifteen (15) days before the date of the meeting. No business shall be transacted at a meeting other than that stated in the notice.

Section 7. Quorum.

A majority of the Commissioners appointed by the member organizations shall constitute a quorum for the transaction of business at any meeting of the Commission, provided, however, that if less than a majority of such Commissioners is present at said meeting, a majority of Commissioners who are present may adjourn the meeting from time to time without further notice.

Section 8. Informal Action.

Any action required to be taken at a meeting of the Commission may be taken without a meeting if a consent in writing, setting forth the action so taken, shall be signed by all the Commissioners.

Section 9. Executive Committee.

The Executive Committee shall be composed of the officers of the Commission and two additional members to be elected by the Commission, one of which must be a consumer.

The Executive Committee shall have and exercise all of the authority of the Commission in the management of its affairs, except as otherwise required by law. Vacancies in the membership of the Committee shall be filled by the Commission at a regular or special meeting of the Commissioners. The Executive Committee shall keep regular minutes of its proceedings and report the same to the Commission when required.

Section 10. Other Committees.

The Chairperson of the Commission may, from time to time, designate two or more Commissioners to constitute one or more special committees to carry out specific mission(s) as outlined by the Chairman. After a special committee's mission has been accomplished, the special committee shall be dissolved.

ARTICLE VI: OFFICERS

Section 1. Officers.

The officers of the Commission shall be a Chairperson, a Vice-Chairperson and a Secretary-Treasurer, and such other officers as the Commission may authorize, all of whom shall be elected from the Commission.

Section 2. Election.

At the regular meeting closest in time to the beginning of each fiscal year on July 1, the Commissioners shall elect officers in the following order: Chairperson, Vice-Chairperson, Secretary-Treasurer, such officers to assume their responsibilities on July 1 of the same year. Elections shall be by secret ballot of all Commissioners present.

Section 3. Term of Office.

Each officer shall hold office for one (1) year and until his/her successor is elected and qualified. The Chairperson may serve a maximum of three (3) consecutive years. Other officers shall be eligible for re-election without limit.

Section 4. Removal.

Any officer may be removed from office by a vote of the majority of the Commissioners in attendance at any regular or special meeting of the Commission.

Section 5. Vacancies.

A vacancy in any office because of death, resignation, removal or incapacity shall be filled in the manner prescribed for the regular election of officers at the meeting of the Commission next following.

Section 6. Chairperson.

The Chairperson shall preside at all meetings of the Commission and may sign on behalf of the Commission all contracts, documents and instruments authorized by the Commission.

Section 7. Vice-Chairperson.

The Vice-Chairperson shall act as Chairperson in the absence or incapacity of the Chairperson, and when so acting shall have all the responsibility, power and authority of the Chairperson.

Section 8. Secretary-Treasurer.

The Secretary-Treasurer shall have charge and custody of and be responsible for all funds and securities of the Commission, see that an adequate accounting system is maintained to give a true and accurate accounting of the financial transactions of the corporation and that reports of such transactions are presented to the Board; and in general perform all duties incident to the office of Secretary-Treasurer. The Secretary-Treasurer shall be the custodian of the Commission records and of the seal of the Commission.

ARTICLE VII: ADMINISTRATION

Section 1. Administrative Management.

The Commission may contract with a qualified corporation to provide administrative and technical services to the Commission. The contracting corporation shall be given authority and shall be held responsible for the coordination and administration of the certification program subject to such policies as may be adopted and such orders as may be issued by the Commission or by limitations stated in these Bylaws.

Section 2. Gifts.

The Commission may accept any grant, contribution, gift, bequest or devise for its general purposes.

Section 3. Indemnity.

Each Commissioner, officer, committee member and other agent of the Commission shall be held harmless and indemnified by the Commission against all claims and liabilities and all costs and expenses, including attorney's fees, reasonably incurred or imposed upon him/her in connection with or resulting from any action, suit or proceeding, or the settlement or compromise thereof, to which he/she may be made a party by reason of any action taken or omitted to be taken by him/her as a Commissioner, officer, committee member or agent of the Commission, in good faith.

This right of indemnification shall inure to such person whether or not he/she is a Commissioner, officer, committee member or agent at the time such liabilities, costs or expenses are imposed or incurred and, in the event of his/her death, shall extend to his/her legal representatives. To the extent available, the Commission shall insure against any potential liability hereunder.

Section 4. Fiscal Year.

The fiscal year of the Commission shall begin on July 1 and end on June 30 of each year.

Section 5. Public Information.

The Bylaws, Statement of Certification Procedures, Criteria for the Counselor Certification Program in Rehabilitation Counseling, list of Certified Rehabilitation Counselors and actions of the Commission regarding certification shall be made available to all. The minutes of the Commission, reports, instruments and other documents shall be held in confidence unless released upon the direction of the Commission.

ARTICLE VIII: LIQUIDATION AND DISSOLUTION

In the event of the liquidation or dissolution of the Commission, whether voluntary or involuntary, the assets of the Commission remaining after payment of its obligations shall have been made or provided for, and which shall not be held upon condition requiring return, transfer, or conveyance, which condition occurs by reason of such dissolution or liquidation, shall be used or distributed exclusively for purposes within those set forth in the Commission's Articles of Incorporation and within the intendment of Section 501(c) (3) of the Internal Revenue Code of 1954 and its Regulations as the same now exist or as they may hereafter be amended from time to time.

ARTICLE IX: AMENDMENT

These Bylaws may be altered, amended or repealed and new Bylaws may be adopted at any meeting of the Commission by a majority vote of the Commissioners present at the meeting.

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

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Marie Feingold
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Carl E. Hansen, Ph.D.
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Claude Myer
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Michael Oliverio
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ADMINISTRATIVE OFFICE REPORT
December 9, 1976

September Examination

The examination went smoothly at 15 sites across the country. The sites in Alaska and Hiwaii were supervised by monitors approved by the Examinations Committee.

246 candidates were scheduled for this examination, but 22 were unable to attend and participation has been deferred until Spring of 1977. Of the 224 candidates participating in the examination, 197 achieved a passing score. Two candidates were attempting the examination for the second time and failed to achieve a passing score. These two candidates have been informed that they must submit a new application should they desire to pursue certification.

The results of the examination and individual candidate profiles were scheduled to be mailed on October 18. Due to expiration of the Commission's mailing permit, the post office held the returned examination materials for several weeks. Because of this delay, examination results were released to candidates on November 10. Certificates have been ordered for passing candidates.

Spring 1977 Examination

As of December 7, 111 applications have been received for the Spring 1977 Certification Examination. During the months of July, August, September, October and November, an average of 17 applications per month were received. During the last 7 working days, applications have increased to 20 applications per week. With the deadline for receipt of applications four weeks away, we hope that the volume of applications will increase.

We are holding an additional 78 applications of candidates who have previously been approved for certification and deferred to the Spring Examination. This file of 78 candidates does not include the September failures, since they may not choose to retake the examination in the Spring.

Daniel C. McAlees, Ph.D., Chairman
ARCA and NRCA
Harold Rubin, Vice Chairman
ARCA
Florence R. Curnutt, Secretary-Treasurer
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Daniel Smith
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Patricia Whalen
ARCA

Credentials/Appeals Committees

At the June meeting of the Credentials Committee, it was determined that 12 applicants did not meet the Standards and Criteria for certification. Ten applicants have appealed this decision and their files will be reviewed by the Appeals Committee at this December meeting.

Of the 111 new applications received, 37 are being presented to the Credentials Committee for a decision regarding their inclusion in the Certification Examination. An additional 8 applications were deferred to this meeting, pending the receipt of additional information. Only two applicants have responded to this request. Of the six who have not responded, two applicants have received two requests for further information.

1977 Examination Dates

The examination dates for 1977 have been chosen so as not to conflict with the APGA and NRA Conventions. Scheduling the examinations in conjunction with the conventions is not drawing the large number of candidates as previously anticipated. Candidates continue to participate in the examination at the site closest to home. Since many Commissioners attend these two conventions, they are then unable to act as supervising monitor for this examination. Please note the dates of the 1977 Certification Examinations on your calendar, since you may be called upon as supervising monitor.

NRA Exhibit September 1976

The exhibit at the NRA convention did not draw a large number of people. Some of the reasons are detailed on the attached letter from NRA. Consideration should be given to exhibiting at the NRA convention in 1977. Possibly space could be obtained at no charge as in 1975.

In light of the Commission's financial status, it is suggested that we do not exhibit at the APGA convention in Dallas. Instead, the Commission could participate in the "Free-Take-One Exhibit" which has been established for the distribution of pamphlets and brochures for those who do not wish to arrange a booth exhibit. Exhibition management will display the materials and replenish the stock. A fee of $75 would be charged for this and would include a sign with the Commission's name and regular servicing of the materials. A new hand-out will need to be prepared for this exhibit.

Insurance

The Commission is now covered by a professional liability insurance policy. Please see attached for description and coverage.

Communication of Information

While member organizations are receiving materials from the Administrative Office, not all have adequate channels of communication with their membership. Grandfathering applications are still being received in the administrative office. Upon questioning one individual as to where this application was received, it was discovered that a university's rehabilitation counseling program was distributing grandfathering information and applications. Inquiries have been received from branch presidents of NRCA and state certification chairmen regarding the necessity of professional membership as a requirement for certification. Questions have been asked as to when the Commission was going to start the "real" certification by pass/fail examination. It appears that many are unaware of the strides in the certification program. The member organizations of the Commission could perhaps distribute the Highlights of the Commission Meeting to the president of each branch, state newsletters, rehabilitation counseling programs and any other interested group. Many have been unaware of the upcoming requirement of one year of supervision by a Certified Rehabilitation Counselor, until they have read it on the back of a current application.

A new member of the Natresources Staff will be attending the Commission Meetings, replacing Bonnie Jacobi who is no longer with Natresources.

Sandra Street is Assistant to the President of Natresources and she is also the Executive Director of the National Rehabilitation Training Institute. Ms. Street comes from a medical administrative background, being previously employed by the University of MIchigan Medical School as Assistant to the Dean for Student Affairs and as the Administrative Assistant to the American Board of Otolaryngology. Ms. Street was named Woman of the Year in 1976 by Beta Sigma Phi, a business and professional woman's international sorority.

Withdrawal/Redaction Sheet
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Document No. and Type	Subject/Title of Document	Date	Restriction	Class.
01a. Minutes	Commission on Rehabilitation Counselor Certification, Executive Committee Meeting [double-sided] (2 pp.)	12/9/75	C	

Collection:

Record Group: Donated Historical Materials
Office:
Series:
Subseries:
WHORM Cat.:
File Location: CRCC [Commission on Rehabilitation Counselor Certification] '77 [1976-1977] [1]

Date Closed:	9/13/2016	**OA/ID Number:**	52055-010
FOIA/SYS Case #:	2016-2624-S	**Appeal Case #:**	
Re-review Case #:		**Appeal Disposition:**	
P-2/P-5 Review Case #:		**Disposition Date:**	
AR Case #:		**MR Case #:**	
AR Disposition:		**MR Disposition:**	
AR Disposition Date:		**MR Disposition Date:**	

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

P-1 National Security Classified Information [(a)(1) of the PRA]
P-2 Relating to the appointment to Federal office [(a)(2) of the PRA]
P-3 Release would violate a Federal statute [(a)(3) of the PRA]
P-4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
P-5 Release would disclose confidential advice between the President and his advisors, or between such advisors [a)(5) of the PRA]
P-6 Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA]

C. Closed in accordance with restrictions contained in donor's deed of gift.

PRM. Removed as a personal record misfile.

Freedom of Information Act - [5 U.S.C. 552(b)]

(b)(1) National security classified information [(b)(1) of the FOIA]
(b)(2) Release would disclose internal personnel rules and practices of an agency [(b)(2) of the FOIA]
(b)(3) Release would violate a Federal statute [(b)(3) of the FOIA]
(b)(4) Release would disclose trade secrets or confidential or financial information [(b)(4) of the FOIA]
(b)(6) Release would constitute a clearly unwarranted invasion of personal privacy [(b)(6) of the FOIA]
(b)(7) Release would disclose information compiled for law enforcement purposes [(b)(7) of the FOIA]
(b)(8) Release would disclose information concerning the regulation of financial institutions [(b)(8) of the FOIA]
(b)(9) Release would disclose geological or geophysical information

REPORT OF THE FINANCE COMMITTEE

December 10, 1976

Chairperson: Mike Oliverio for Carl Hansen

In Attendance: Dan Smith, Fletcher Hall, Lee Nattress, Sandy Street and Cindy Cardwell

The finance committee saw as its charge the responsibility for long range planning which would involve fiscal responsibility.
The following suggestions were proposed:

That One full meeting of the commission per year and one meeting of the executive committee be held.

That Government and Private grants be pursued.

THAT The income from the certification maintenance be used wisely.

THAT Public Relations and marketing be used to increase number of counselors who will be certified.
The committee sees a great potential here.
a. Contact graduate rehabilitation programs.
b. Contact personnel departments of agencies to get names of potential candidates.

THAT More tests per year and more sites as an incentive for counselor participation be advocated.

THAT Market certification, registries, etc.

THAT The relationships committee be supported in its attempt to market our product.

THAT The Budget committee and the commission be advised to take a long, hard look at our current budget and funds. We will not have sufficient funds to last the initial five years at current rates.

THAT The budget committee be supported in planning annual budgets.

THAT We utilize more effectively the member organizations of the commission to create awareness on the part of certified counselors and potential candidates.

REPORT OF THE REFERENCE FORMS COMMITTEE

December 10, 1976

Chairperson: Dan Smith

In Attendence: Delbert Aman, Anne Crumpton, Lawrence Deneen, Grace Drain, Lawrence Feinberg, Marie Feingold, and Claude Myer

Following discussion of the current supervisor/peer and consumer reference forms, it was recommended:

THAT The current reference forms be replaced by forms which have the the following format:

A statement explaining certification.

A statment that this candidate has applied for rehabilitation counselor certification.

A statement detailing what a certified rehabilitation counselor is and the level of competency expected from a certified rehabilitation counselor.

A statement explaining the importance of references from supervisor, peer, or consumer.

A list of questions for response -

1. How well do you know this person?
2. Are you willing to personally endorse this applicant for certification?
   If yes, a checklist as to how strongly you support their candidacy.
   If no, please indicate why not.
3. Open Comments

It was also recommended:

That Reference forms should be submitted by peers who are Certified Rehabilitation Counselors.

The Relationships Committee will work on the design and format of these reference forms which will be implemented for the first pass/fail Certification Examination in 1978.

STANDARDS & CRITERIA COMMITTEE REPORT

TIME: Luncheon Meeting, September 21, 1976

PLACE: Hollywood, Florida

ATTENDEES: Grace Drain, Claude Myer, Dan Smith, Florence Curnutt

Discussed issues with: Carl Hansen, Anne Crumpton, Dan McAlees

CHAIRMAN: Florence Curnutt

Chairman presented information to ARCA-NRCA Board Meeting, NRCA sub-council on certification, and NRCA delegate assembly.

The Committee meeting was held with those CRCC Commissioners present or available at the NRCA meeting in Hollywood, Florida. A general discussion and input of activities present and future was made. The formal input from sponsoring organizations has been minimal until this present time. (As the CRCC representative to CORE's accreditation commissioner, I presented the proposed changes to CORE at their July meeting and our request for the defined number of internship hours and that the internship be under the supervision of CRC). NRCA Board of Directors is opposing all of the proposed changes except #2 (Masters from non-accredited school, masters with no internship or related masters two years experience needed). Follow-up letters to sponsoring organizations and commissioners regarding their input on the proposed changes will be sent.

In addition to the changes a further clarification needs to be made regarding:

1. "under the supervision of"
2. supervision by CRC
3. experience acceptable before the granting of the degree
4. required number of job functions to be acceptable experience
5. work setting definition as it relates to a non-tradition area

These clarifications need to be made in cooperation with the Credentials Committee since it is their responsibility to interpret the standards and criteria set by the Commission.

NRCA sub-council on certification recommendations made the following: Supervision by CRC requirement "Where an individual, interested in becoming a CRC, whose immediate supervisor is not certified, that such person make his situation known to the Commission in writing, and request supervision by a CRC in his area be accepted as meeting requirement; or that the Commission grant special permission for an individual plan to be worked out by the individual and the Commission; which plan will be accepted as meeting requirement.

Consideration be given to developing a "certified eligible" category in the next change of standards and criteria.

STANDARDS AND CRITERIA COMMITTEE REPORT

December 10, 1976

Flo Curnutt, Chairperson
Delbert Aman, Dorothy Clifford, Larry Deneen, Grace Drain, Dan McAlees and Claude Myer.

The following changes in the Standards and Criteria are proposed:

1. Graduates with Master's degrees in rehabilitation counseling from accredited rehabilitation counseling programs will have no experience requirement.

2. Candidates with Master's degrees in rehabilitation counseling from non-accredited programs or Master's degrees judged to be related to a Master's degree in rehabilitation counseling will be required to have two years of acceptable experience in rehabilitation counseling.

The following requirements of education and experience remain the same:

3. Candidates with Bachelors degrees in Rehabilitation will be required to have four years of acceptable experience in rehabilitation counseling.

4. Candidates with unrelated Master's degrees will be required to have five years of acceptable experience in rehabilitation counseling.

5. Candidates with Bachelor's degrees in any other area than rehabilitation will be required to have five years of acceptable experience in rehabilitation counseling.

In light of the upcoming requirement, as of January 1, 1977, at least one year of the experience submitted by a candidate for certification must have been under the supervision of a Certified Rehabilitation Counselor. This committee has defined supervision as "A systematic and periodic evaluation of the quality of delivery services."

An individual, interested in becoming a CRC, whose immediate supervisor is not certified may be able to meet this requirement. Such person must make his situation known to the Commission in writing upon submission of an application and request that supervision by a CRC in his area be accepted as meeting the requirement; or that the Commission grant special permission for an individual plan to be worked out by the individual and the Commission, which plan must be accepted prior to the beginning of this required year of experience.

The Committee also recommended

That acceptable experience in rehabilitation counseling under the supervision of a

Certified Rehabilitation Counselor gained prior to the granting of a Master's degree will be accepted by the Commission.

and that

Pre-Master's experience not under the supervision of a Certified Rehabilitation Counselor will not be considered acceptable by the Commission.

Acceptable experience in rehabilitation counseling is defined as:

1. Full time employment acceptable to the Commission in the use of rehabilitative counseling techniques

2. Vocational evaluation

3. Psychological assessment

4. Social, medical, vocational psychiatric information

5. Rehabilitative methods in an agency (public or private), hospital or clinic, in which the applicant is under professional supervision and has employed such methods and measures.

In order for experience to be considered acceptable, the job description must contain three of the above listed components.

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Document No. and Type	Subject/Title of Document	Date	Restriction	Class.
01b. Minutes	Certification Maintenance Committee [double-sided] (1 pp.)	12/10/77	C	

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P-4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
P-5 Release would disclose confidential advice between the President and his advisors, or between such advisors [a)(5) of the PRA]
P-6 Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA]

C. Closed in accordance with restrictions contained in donor's deed of gift.

PRM. Removed as a personal record misfile.

Freedom of Information Act - [5 U.S.C. 552(b)]

(b)(1) National security classified information [(b)(1) of the FOIA]
(b)(2) Release would disclose internal personnel rules and practices of an agency [(b)(2) of the FOIA]
(b)(3) Release would violate a Federal statute [(b)(3) of the FOIA]
(b)(4) Release would disclose trade secrets or confidential or financial information [(b)(4) of the FOIA]
(b)(6) Release would constitute a clearly unwarranted invasion of personal privacy [(b)(6) of the FOIA]
(b)(7) Release would disclose information compiled for law enforcement purposes [(b)(7) of the FOIA]
(b)(8) Release would disclose information concerning the regulation of financial institutions [(b)(8) of the FOIA]
(b)(9) Release would disclose geological or geophysical information

PRACTICES AND PROCEDURES OF THE ETHICAL PRACTICES COMMITTEE OF THE COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

Implicit in the public's acceptance of rehabilitation counselor certification as a standard of professional practice is the existence of mechanisms and procedures for professional self-regulation and public accountability. The Ethical Practices Committee was established by the Commission on Rehabilitation Counselor Certification (CRCC) to enforce the Code of Ethics of the Commission and to establish procedures for administering the Code when allegations of violations are brought to its attention. The Code originally adopted by the Commission and currently circulated to all applicants for certification is an abbreviated version of the "Code of Ethics for Rehabilitation Counselors" developed by the National Rehabilitation Counseling Association. As experience develops, the Commission, through its Board of Directors, shall make such changes in its Code of Ethics as may prove necessary or desirable. All Certified Rehabilitation Counselors (CRC's) will be notified of any such changes and appropriate publicity will be given so that potential applicants and the professional and general public will be duly informed.

It is essential that the procedures adopted by the Ethical Practices Committee be fair and objective and serve to enhance the credibility of the certification process as a whole. The actions of the Committee must reflect unbiased administration, maintenance of confidentiality and clear regard for due process. The practices and procedures of the Committee herein outlined have been approved by the Board of Directors of Commission on Rehabilitation Counselor Certification.

Since the Code of Ethics currently endorsed by the Commission is a general statement of fundamental principles and basic objectives of ethical professional behavior, any act which violates the spirit and purposes of the Code shall be considered unethical practice. It is the responsibility of the Ethical Practices Committee to interpret the Code in relation to specific acts and to adjudicate alleged violations accordingly. As cases and decisions accumulate, they shall be disseminated by the Committee to illustrate the ethical principle involved and the basis of the decision rendered.

1. Procedures in regard to allegations of unethical behavior.

   It is the responsibility of every Certified Rehabilitation Counselor to report instances of unethical professional behavior to the Ethical Practices Committee. The Committee will also receive allegations of violations of the Code by CRC's from non-certified rehabilitation counselors, other professionals, consumers, and the general public. Allegations made against non-certified rehabilitation counselors will generally be referred to other appropriate bodies (i.e., ARCA, NRCA, etc.) except in cases where, in the judgment of the Committee, such alleged violations reflect directly on the integrity of the Commission on Rehabilitation Counselor Certification and/or the counselors it certifies.

A. Investigation

The Ethical Practices Committee will investigate alleged violations to determine if further proceedings are warranted. If, in the opinion of the Committee, there is enough information to substantiate the allegation, the alleged offender will be advised in writing of the alleged offense and will be invited to provide a written defense.

B. Hearing

If, in the opinion of the Committee, the alleged offender's written defense does not dispose of the allegation, the alleged offender will be advised in writing of the Committee's preliminary findings and will be afforded an opportunity for a fair hearing. The Committee shall determine an appropriate time and place of such hearing and shall appoint the person or persons who will preside at the hearing. The alleged offender shall have an opportunity, at such a hearing, to present whatever information he/she may deem appropriate to his/her defense and may be represented at the hearing by counsel of his/her own choosing, at his/her own expense.

C. Findings and Recommendations of the Committee

The presiding officer shall submit to the Committee, promptly after conclusion of the hearing, a detailed written summary of the proceedings and all facts presented along with a written opinion on the validity or non-validity of the allegations and the significance of any extenuating circumstances. The Committee shall, by majority vote, either a) endorse the opinion of the hearing officer or b) overrule the opinions of the hearing officer or c) authorize a supplemental or rehearing before the same or other hearing person or persons at a time and place it deems appropriate.

D. Action by the Commission

If the majority of the Committee find the allegations to be valid, recommendations for action against the offender will be prepared by the Committee and submitted by the Committee Chairperson to the Board of Directors of the Commission on Rehabilitation Counselor Certification. Member of the Appeals Committee would be excluded from voting. Approval of recommended action(s) shall require a two-thirds vote of the Board of the Commission. The findings of the Ethical Practices Committee and the proposed actions of the Board shall be communicated in writing to the offender by the Chairperson of the Commission.

2. Appeals

The offender shall have a reasonable time to advise the Commission in writing of his/her desire for an appeal. The Appeals Committee of the Commission shall be charged with a review of the Ethical Practices Committee's findings and the Board's determination and proposed actions. Such review shall provide opportunity for submission of written briefs by the offender and the Ethical Practices Committee. The Appeals Committee shall take such actions as it considers appropriate including a) endorsing the proposed actions of the Board, b) overruling the proposed actions of the Board, or c) imposing more or less severe penalties than those originally proposed. The written decision of the Appeals Committee shall be submitted to the appellant and shall be recorded among the permanent records of the Commission.

REPORT OF THE EXAMINATIONS COMMITTEE

December 10, 1976

Chairperson: Anne Crumpton

In Attendance: Terrance O'Rourke, Claude Myer, Lex, Lee Nattress, Frost Liederbach

After review and discussion of the September examination results, it was recommended:

THAT A grant from HEW be pursued in order to develop an examination that can be made more discriminatory.

THAT The Examinations Committee be budgeted to meet to review items presently in the pool in order to strengthen weak and deficient areas. The committee should also review the content classification guide in order that consumer advocacy, vocational evaluation and use of rehabilitation facilities be included in the content classification guide.

THAT Monies be scheduled for the continued development of evaluation materials in order to insure the credibility of the testing mechanism.

THAT The mean scores of the subtests and total examination be included in the the profiles.

THAT The Examinations Committee accept the report on the September 1976 examination written by Natresources.

With regards to the Spring and Fall 1977 examinations, it is recommended:

THAT The spring examination be scheduled for Saturday, April 23rd instead of the day the APGA meeting is held.

THAT The fall examination be held October 28th.

THAT Member organizations recommend barrier free sites and CRC's to act as monitors to be approved by the Examinations Committee. Such a request shall provide a rationale for maintaining security of the examination.

Lex expressed concern about the homogeneity of the examination. He raised the questions of how the exam can reflect adequately rehabilitation counseling when it seems not to cover a wide variety of rehabilitation counseling areas. Terry stated that the exam had few questions relating to deafness.

With regards to the examination, The Examinations Committee calls to the commission's attention that the credibility of the certification process rests on the exam and urges the funding be a high priority.

REPORT OF THE RESEARCH COMMITTEE

December 10, 1976

Chairperson: James Engelkes

In Attendance: Roger Livingston, Lex Frieden, Lawrence Feinberg

The Research Committee reviewed both grandfathering and pass/fail data from the April 1976 Examination and the demographic data.

The announcement of the availability of the data pool to the rehabilitation research community will occur by January 1977. Thus far, two requests for data have been received and are being clarified.

A dissertation using the July 1975 CRCC Field Review is being done by a doctoral candidate at the University of Northern Colorado. A report on this project will be available by June 1977.

The Committee will continue to do similar averages and correlational analyses as data becomes available.

REPORT OF CREDENTIALS COMMITTEE MEETING
June 2-5, 1976

The files of 37 applicants were reviewed at this meeting:

15 applicants were accepted as candidates for the September examination;
8 applicants were accepted as candidates for the Spring 1977 examination;
2 applicants were deferred for review at the December meeting, pending receipt of further information;
12 applicants were denied candidacy for the examination because their experience did not meet the definitions of acceptable experience in rehabilitation counseling.

Question 1: How long should applications be held for candidates deferring participation in the examination to future times?

Ruling: Each approved candidate for the Certification Examination is entitled to one deferral from the scheduled examination date on the same application. If the candidate does not sit for the examination on his deferred date, the candidate must reapply.

Question 2: How to handle the applications of rehabilitation counselors who want their previous experience to be considered in meeting the number of years required when this previous experience is not rehabilitation counseling?

Ruling: Applicants before the Credentials Committee will no longer be deferred to future examination in order to meet basic qualification of experience. Such applicants must re-apply when the basic qualifications are met.

Question 3: How to handle advance applications?

Ruling: On the date the application is submitted, the experience requirement must have been met. Any applications received prior to meeting education and experience requirements will be rejected and the applicant will be required to submit a new application and fee.

The above rulings could not be applied to the 37 files reviewed by the Committee at this meeting. All application forms as of June 5, 1976 contain the insert stapled to each application.

CREDENTIALS COMMITTEE REPORT

TIME: December 10, 1976 - Holiday Inn Chicago City Center

ATTENDEES: Florence Curnutt, Dorthy Clifford, Lawrence Deneen, Terrence O'Rourke

CHAIRPERSON: Florence Curnutt

Since 3/4 of this Committee is composed of new Commission members, much time was spent in discussing the definition of acceptable experience. Larry Deneen suggested that in reviewing experience, we first look for the counseling relationship and then two other components from the definition.

If the counseling component is not there, the applicant is not accepted no matter how much time he has in one of the components.

Commission on Rehabilitation Counselor Certification
Expense Statement

Date: December 14, 1976

Name: Lex Frieden

Address: 9667 Meadowdale
Houston, Texas 77063

Arrival date: 12-10-76 Time: 2:00 P.M.

Departure date: 12-12-76 Time: 2:00 P.M.

Percentage of time spent

Commission meeting	66 %
Committee meetings	34 %
Task Force meeting	%
Total	100 %

EXPENSES

Date	Item	Total Expense	Reimbursement Rate	Amount Reimbursed
xxx	Air Fare (coach)	$ 100.	cost	
xxx	Hotel (nights:)	———	cost	
xxx	Telephone expenses incidental to Comm	———	cost	
xxx	Telephone expenses not incidental to Comm		-------	
12-10	Transportation cab/tip from Airport to Hotel	$11.00	cost	
12-12	" cab/tip from Hotel to Airport	$11.00	cost	
	" cab/tip from to		cost	
	" cab/tip from to		cost	
	" other: miles @ 15¢		15¢/mil	
12-12	Meals breakfast/lunch/dinner At AIRPORT	$4.50	$15.00	
	" breakfast/lunch/dinner		$15.00	
	" breakfast/lunch/dinner		$15.00	
	" breakfast/lunch/dinner		$15.00	
	" other		-------	
	Other expenses (please describe) ALL totals include Attendant M. BRODIE			
TOTALS		$126.50	Reimbursed:	

PAID

For the purpose of audit please submit transportation, hotel and as many other receipts as possible with this expense statement. Thank you.

OK to pay

Payment authorized

Check number 1007

Date 2/22/77

Room 308, 1346 Connecticut Avenue, N.W. • (202) 785-4265
Washington, D.C. 20036

American Coalition of Citizens with Disabilities Inc.

March 1, 1977

Ms. Lucy Redmon
Administrative Assistant
Commission on Rehabilitation Counselor Certification
520 North Michigan Avenue
Suite 1504
Chicago, Illnois 60611

Dear Ms. Redmon:

On February 20, 1977 the Board of American Coalition of Citizens with Disabilities Inc. met in Denver Colorado and decided on the following terms for the three American Coalition of Citizens with Disabilities representatives on the CRCC:

Delbert Aman	1 year term
Lex Frieden	2 year term
Terrence O'Rourke	3 year term

I apologize for the error in our communication and I hope this letter will clear up the matter.

Very truly yours,

Eunice Fiorito

Eunice Fiorito
President
American Coalition of Citizens
with Disabilities Inc.

CC: Aman
Frieden
O'Rourke
Bowe

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

520 North Michigan Avenue - Suite 1504
Chicago, Illinois 60611
(312) 644-4329

January 28, 1977

TO: ALL COMMISSIONERS

Dear Commissioner:

As requested by the Commission at the December meeting I spent the weekend of January 23 and 24 in Chicago going over the proposed Natresources contract, looking over similar contracts, doing some general looking around and taking a very serious look at our finances for the next 18 months.

Your know from my previous letter my position on the new contract. It is just and fair, and represents a very reasonable cost for services rendered. I examined several contracts Natresources has with other groups and was given access to proposals made by other services for similar activities. In every case the cost to the Commission was considerably lower and by large amounts. In addition Natresources has provided us and continues to provide many supportive and administrative services at no cost, saving additional dollars. The question was recently raised, can we afford such increases? My answer to these questions must take the form of other questions. If we can assume that we are being offered a fair price for services rendered, a price below market value, and have reasonable confidence in the value of that service, why should we question it and why can't we afford it? For myself I have answered positively to the first two issues and hope other Commissioners will reach the same conclusion. With regard to the last issue, why can't we afford it, the answer must be found within the Commission itself. That answer is simply poor financial planning. Examples of this are abundant and rest on no one group or individual. Setting fees unreasonably low resulted in inadequate income, a lack of realistic long range planning, requiring modern, barrier free hotels cost extra, requiring two full Commission meetings a year when one would really do, expanding the size of the Commission, spending too much time on small issues as we ignored the larger ones and on and on. We are all responsible for our current situation and so in reading the rest of this letter try not to seek out someone to blame, but take a look at your own role in this situation and then lets all get to work and salvage the Commission.

Salvage! Did someone say salvage? Is the situation that serious? You bet your CRC it is.

Daniel C. McAlees, Ph.D., Chairman
ARCA and NRCA
Harold Rubin, Vice Chairman
ARCA
Florence R. Curnutt, Secretary-Treasurer
NRCA

Anne D. Crumpton
NRCA
Grace Drain
NANWRW
George Ebra
NRCA
James R. Engelkes, Ph.D.
CRCE

Frederick Fay, Ph.D.
CONSUMER REP.
Larry Feinberg, Ph.D.
CORE
Marie Feingold
ARCA
Carl E. Hansen, Ph.D.
ARCA

Claude Myer
CSAVR
Michael Oliverio
NRCA
Daniel Smith
ARF
Patricia Whalen
ARCA

Fact I -We will spend $68,753 this year, not $38,665 as expected. We will take in only $23,400, using $45,353 of our surplus not $12,000 as expected.

Fact II - Without substantial curtailment of our activities we will spent $77,690 next year. We will take in $47,500 in income if we certify 600 counselors, an increase of 100 over this year.

Fact III - If this course is pursued by 6/30/78 we will be in the red by $24,662 on a cash basis.

Can someone tell me where $24,662 is going to come from? We would have to certify another 329 counselors to raise that much. In my opinion certifying 929 counselors next year is unrealistic. Here is another fact you might have an interest in. Commissioners as a group and as individuals are responsible for depts incurred as the result of a deficit. Anyone care to lay out hard cash from their own pockets? I doubt it.

Basically there are two ways of overcoming our problem. One is to increase income the other to reduce expenses. I strongly suggest both with a large emphasis on reducing expenses. My reasoning for this emphasis is simple. Increasing income is risky at best, its a shot in the dark that may or may not materialize but an effort can result in some change. Expenses are real we can predict them with reasonable accuracy and control them with reasonable decisiveness.

I, therefore recommend the following actions.

I Increase our P/R effort and try to get more counselors to respond.

II Decrease, drastically, our level of expenses in the following areas.

a. Postpone the June "77" meeting to September "77" in conjunction with the NRA meeting in Washington. Committees can meet during the convention and the full commission will meet on the Saturday and Sunday following the convention. This should save some travel and hotel expenses as some commissioners can charge these expenses to other resources.

b. Eliminate all other Commission meetings for that year and rely more heavily on essential committee meetings and Executive Committee decisions. Thus essential committees will meet the following March and the Executive Committee will meet in June of "78" to conduct Commission business. Other committees will be required to conduct business by mail or phone and make reports available to the Executive Committee by June of "78".

c. Have only one administration of the examination in 1977-78. This will save about $9,300. I would suggest that the Fall exam be cancelled and the exam be held in the Spring of 1978. This will give us time to gather all available applications, implement our P/R efforts and thus maximize income. I realize that the Fall exam has already been announced but it will be a small hardship to the counselors to postpone it and will be of great assistance to the Commission.

d. Also enclosed you will find a breakdown analysis done by me. It analyses our financial condition on a breakdown basis. Quite simply it states that in order to breakdown at $75 per counselor we must certify between 1,800 - 1,900 counselors per year. An impossible goal. By raising our fee to $100 per counselor our breakeven point drops to 1,000 counselors per year. Given a five year certification maintenance schedule and a reasonable fee in that program generating a moderate surplus it would appear that a fee of between $90 - $100 would be appropriate. Exact figures cannot be given as we do not have a fix on the cost of certification maintenance nor have we set a fee at this time.

However, by adopting a higher fee soon and combining that with the maintenance program our finances should improve drastically and we could resume normal Commission activities by 7/1/78.

The results of such actions will substantially effect the effectiveness of the Commission but will not result in its demize or its impact on the field. In looking at the budget I found very little to be cut except Commission activities. These activities represent nearly half of our costs. The rest are directly or indirectly related to the examination itself and vary according to the number of counselors applying and certified. Cut these and we cut our income. Cut Commission expenses and we slow down its developmental process but continue in business.

And that fellow Commissioners is the basic question. Do we cutail our activities or go down with our principles and burning need to discuss the issues? My report has been discussed with all members of the Finance Committee and Dan McAlees and have their support. The budget materials enclosed graphically illustrate my points. Please consider these recommendations carefully. I realize that my report may leave you with many questions and welcome your comments, so phone or write if you want more information.

Enclosed is a ballot. The only question you need decide at this point is to postpone our June meeting until September, the rest can be fully discussed at that meeting. I trust my report has given you some answers, left you with some questions, and illustrates our predicament. Please respond at your earliest convenience.

Sincerely,

Daniel D. Smith

DDS:bam

BUDGET REVISIONS 1976-77

EXPENSE CATEGORY	ORIGINIAL AMOUNT	REVISED AMOUNT
Commissioner Expenses	-	-
Task Force 8/76	-	-
Task Force 1/77	-	-
Task Force (unscheduled)		
Comm/Comm Mtgs. 12/76	$3,250	$9,000
Comm/Comm Mtgs. 6/77	$3,250	-*
Comm. 9/76	-	-
Comm. 3/77	$1,550	$1,550
Committees (unscheduled)	-	$1,480
Examination Printing	$ 500	$2,300
Cert. Printing/Lettering	$ 450	$ 800
Other External Printing	$ 250	$ 250
In house printing	$ 500	$ 800
Postage	$2,000	$2,600
Telephone	$2,500	$1,500
Shipping, Monitors, Exam room rental	$2,000	$6,000
Office supplies consumable	$1,200	$1,200
Office supplies non-consumable	$ 100	$ 100
Professional fees	$1,000	$3,000
Insurance	$3,000	$1,500
Convention/PR expense	$1,000	$2,000
Miscellaneous	$1,000	$1,000
Refunds	-	$ 250

* If proposal to eliminate meeting of 6/77 is accepted, otherwise $9,000 will be spent and added to budget.

	ORIGINAL AMOUNT	REVISED AMOUNT
SUBTOTAL	$23,550	$35,330*

* $44,330 if we meet in June 1977.

EXPENSE CATEGORY	ORIGINAL AMOUNT	REVISED AMOUNT
Natresources M/C item development	$1,125	-
Natresources Prep. of exam. instruc.	$2,000	$2,000
Natresources Exam arrangements	$ 500	$2,000
Natresources Mailing/retn. supplies	$ 125	$ 300
Natresources Ck-in materials	$ 525	$1,125
Natresources Scan/score/analysis	$ 900	$1,800
Natresources Prep/printing reports	$2,000	$2,000
Natresources Application Processing	$4,000	$5,000

EXPENSE CATEGORY	ORIGINAL AMOUNT	REVISED AMOUNT
Natresources Meeting Arrangements	$ 160	$ 160
Natresources Mtg. attendance	$1,200	$1,800
Natresources Minutes/Highlights	$ 500	$ 500
Natresources Cert. handling/mtg.	$ 400	$1,500
Natresources Overhead/occupancy	$1,000	$2,000
Natresources Substotal	$14,435	$20,185
Other Substotal	$23,550	$35,330
TOTAL EXPENSES	$37,985	$55,515 64,515*

* Total if meeting is held 6/77

SPECIAL PROJECTS	ORIGINAL AMOUNT	REVISED AMOUNT
Registry	-	$2,500.00
Interim lists	-	$ 8.00
Research	$ 250	$ 250.00
Candidate Guide	$ 150	$1,200.00
UNC Stan analysis	$ 280	$ 280.00
Total Special Projects	$ 680	$4,238.00
Total Expenses	$38,665	$59,753/$68,753

Income 1976-77
- Cash on Hand 6/30/76 $50,881.03
- Income 7/1/76-6/30/77 $23,400.00

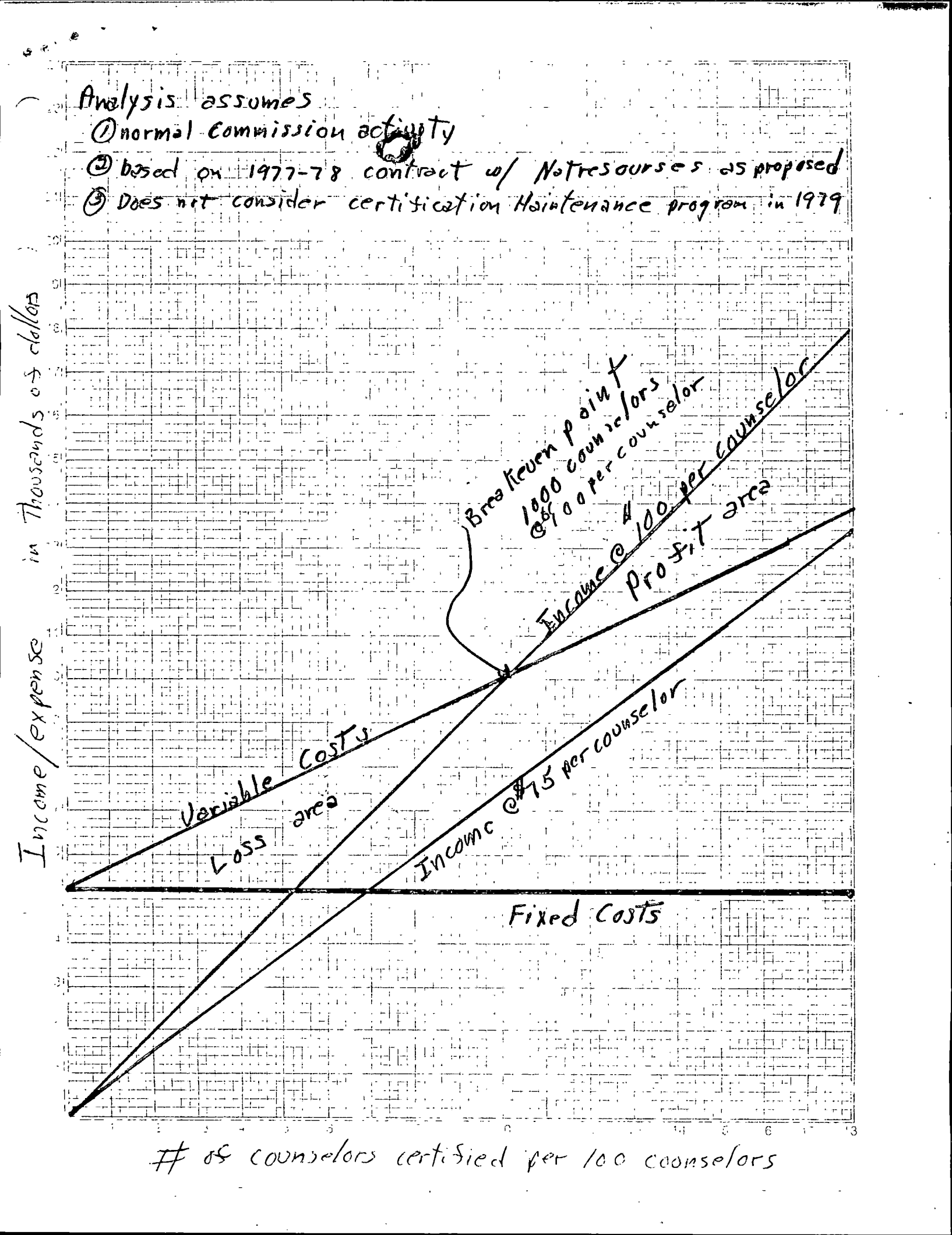
Expenses 7/1/76-6/30/77 $59,753/$68,753
- Deficit incurred ($36,353)/($45,353)
- Cash on Hand 7/1/77 $14,528.03/$5,528.03

Budget Proposal 7/1/77 - 6/30/78
Budget based on certification of 600 counselors.

EXPENSE CATEGORY	W/O CUTS	WITH PROPOSED CUTS
Task Force 8/77	-	-
Task Force 1/78	-	-
Task Force (unscheduled)	-	-
Comm/Comm mtg. 9/77	-	$9,000
Comm/Comm mtg. 12/77	$9,000	-
Comm/Comm mtg. 6/78	$9,000	-
Committees 9/77	$1,600	-

EXPENSE CATEGORY	W/O CUTS	WITH PROPOSED CUTS
Committees 12/77	-	$1,600
Committees 3/78	$1,600	$1,600
Executive Committee 6/78	-	$2,000
Committees Unscheduled		
Examination Printing	$2,700	$1,700
Cert. printing/lettering	$1,000	$1,000
Other external printing	$ 300	$ 300
In house printing	$ 900	$ 900
Postage	$2,900	$2,900
Telephone	$1,800	$1,800
Shipping/Monitors		
exam room rental	$7,200	$4,500
Office supplies (consumable	$1,200	$1,200
Office supplies (non consumable)	$ 100	$ 100
Professional fees	$3,000	$3,000
Insurance	$1,500	$1,500
Convention P/R expense	$1,000	$1,000
Misc.	$1,000	$1,000
Refunds	$ 300	$ 300
Subtotal	$46,100	$35,400

EXPENSE CATEGORY	W/O CUTS	WITH CUTS (PROPOSED)
Natresources items		
M/C revisions	$ 747	$ 747
Prep. exam instructions	$2,500	$1,250
Exam arrangements	$ 720	$ 360
Mailing/retn. supplies	$ 600	$ 300
Ck-in exam materials	$1,200	$1,200
Scan/score/analysis	$4,662	$4,662
Prep/printing reports	$3,270	$2,370
Application Processing	$7,000	$7,000
Meeting Arrangement	$ 500	$ 300
Meeting Attendance	$3,120	$1,500
Minutes/Highlights	$1,200	$ 600
Cert. Handling/Mailing	$ 840	$ 840
Overhead/Occupancy	$5,231	$4,225
Subtotal	$31,590	$21,129
Total Expenses 7/1/77-6/30/78	$77,690	$56,599
Income 1977-78		
600 certifications	$30,000	
700 applications X 25	$17,500	
Total Income	$47,500	
Defect.	($30,190)	($9,099)
Cash on Hand 6/30/77	$14,528.03/$5,528.03	
Total Cash (deficit) excess 6/30/78	($15,662)/($24,662)	$5,429/($3,571)


Analysis assumes
① normal commission activity
② based on 1977-78 contract w/ Natresourses as proposed
③ Does not consider certification Maintenance program in 1979
Income/expense in Thousands of dollars
Breakeven point
1000 counselors
@ $100 per counselor
Income @ $100 per counselor
Profit area
Variable Costs
Loss area
Income @ $75 per counselor
Fixed Costs
# of counselors certified per 100 counselors

MAIL BALLOT

Motion: That the Commission meeting scheduled for June 1977 be postponed until September 1977 in conjunction with the NRA convention in Washington,D.C. Committees will be required to meet during the convention and the full Commission will meet on the Saturday and Sunday following. The Convention will be held from 9/6/77 through the morning of 9/10/77. The Commission will meet from the afternoon of 9/10/77 through 9/11/77.

YES ☐ NO ☐

Your Signature_____

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

520 North Michigan Avenue - Suite 1504
Chicago, Illinois 60611

(312) 644-4329

February 15, 1977

Eunice Fiorito, President
American Coalition of Citizens
with Disabilities, Inc.
The Mayor's Office for the Handicapped
250 Broadway - Room 1414-A
New York, NY 10017

Dear Ms. Fiorito:

At the December meeting of the Commission, the American Coalition of Citizens with Disabilities, Inc. had been accepted as a member organization of the Commission by all the other member organizations. The nominations of Lex Frieden, Delbert Aman and Terrence O'Rourke have been approved by the members of the Commission.

A communications breakdown has led to the appointment of each of the three ACCD members for a three year term. The Executive Committee's interpretation of the original motion was that such representatives would be appointed for one, two and three year terms, staggered to be consistent with the rest of the Commission appointments. The Executive Committee recommended that the three ACCD representatives decide among themselves the most appropriate procedure to assign one, two, and three year board memberships.

As we understand, the three ACCD representatives to the Commission would be contacting you and the Board of ACCD regarding the term of office of each individual. We hope to hear from you in the near future regarding the terms of office of the ACCD representatives.

Sincerely,

Lucy E. Redmon
Administrative Assistant
to the Commission

CC: Delbert Aman
Lex Frieden
Terrence O'Rourke

Daniel C. McAlees, Ph.D., Chairman
ARCA and NRCA
Harold Rubin, Vice Chairman
ARCA
Florence R. Curnutt, Secretary-Treasurer
NRCA

Anne D. Crumpton
NRCA
Grace Drain
NANWRW
George Ebra
NRCA
James R. Engelkes, Ph.D.
CRCE

Frederick Fay, Ph.D.
CONSUMER REP.
Larry Feinberg, Ph.D.
CORE
Marie Feingold
ARCA
Carl E. Hansen, Ph.D.
ARCA

Claude Myer
CSAVR
Michael Oliverio
NRCA
Daniel Smith
ARF
Patricia Whalen
ARCA

Expense Statement

Date: December 11, 1976

Name: Lex Frieden

Address: 9667 Meadowcale.
Houston, Texas 77063

Arrival date: 12-10-76 Time: 2:00 PM

Departure date: 12-12-76 Time: 2:00 PM.

Percentage of time spent

Commission meeting	66 %
Committee meetings	34 %
Task Force meeting	%
Total	100 %

EXPENSES

Date	Item	Total Expense	Reimbursement Rate	Amount Reimbursed
xxx	Air Fare (coach)	$ 100.	cost	
xxx	Hotel (nights:)	———	cost	
xxx	Telephone expenses incidental to Comm	———	cost	
xxx	Telephone expenses not incidental to Comm		-------	
12-10	Transportation cab/tip from Airport to Hotel	$ 11.00	cost	
12-12	" cab/tip from Hotel to Airport	$ 11.00	cost	
	" cab/tip from to		cost	
	" cab/tip from to		cost	
	" other: miles @ 15¢		15¢/mil	
12-12	Meals breakfast/lunch/dinner At AIRPORT	$ 4.50	$15.00	
	" breakfast/lunch/dinner		$15.00	
	" breakfast/lunch/dinner		$15.00	
	" breakfast/lunch/dinner		$15.00	
	" other		-------	
	Other expenses (please describe) ALL totals include Attendant M. Brown			
TOTALS		$ 136.50	Reimbursed:	

For the purpose of audit please submit transportation, hotel and as many other receipts as possible with this expense statement. Thank you.

Payment authorized ———

Check number ———

Date ———

Holiday Inn

CHICAGO CITY CENTRE

ITEM	DATE	TIME	OSR	VOUCHER	ACCOUNT	ACCOUNT NAME	AMOUNT

831795

93.59

AUTHORIZATION TO BILL COMPANY

I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or association fails to pay for any or the full amount of these charges.

NAME _____ AMOUNT _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

"Room rates are subject to an additional charge of 8.1% (6.1% to reimburse us for the Illinois Hotel Operators' Occupation Tax and the Chicago Hotel Operators' Tax, and a 2.0% Chicago Hotel Accommodations Tax imposed by the City of Chicago."

_____
SIGNATURE

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

520 North Michigan Avenue · Suite 1504
Chicago, Illinois 60611

(312) 644-4329

12/13/76

To All Commission Members,

I would like to apologize to the commission for not being able to attend the full meeting from beginning to end. However family considerations took precedence over the meeting.

With that aside, I would like to point out to you the following monetary changes in the new contract submitted by Natresources for our approval. (You may have voted to accept the contract after I left the meeting so that this information may be extraneous. When you read it please keep in mind that our administrative officer should be constantly aware of our financial condition. Also many of our salaries have been hit by the "financial crunch" and has resulted in our not taking any salary increase, and in some cases cuts.)

(1) Are you aware of what it costs the Commission to have four (4) individuals from Natresources in attendance at our meetings? Couldn't our own Secretary-Treasurer take notes or could we not hire a temporary secretary to take and record the minutes of our meetings?

If we need our administrative officer present, he could attend the executive committee meeting where clarification of any problem could be explored.

One of the members of the Commission could be appointed Parliamentarian and supplied with Roberts Rules of Order to deal with any procedural problems at far less cost than we are now paying.

Daniel C. McAlees, Ph.D., Chairman
ARCA and NRCA
Harold Rubin, Vice Chairman
ARCA
Florence R. Curnutt, Secretary-Treasurer
NRCA

Anne D. Crumpton
NRCA
Grace Drain
NANWRW
George Ebra
NRCA
James R. Engelkes, Ph.D.
CRCE

Frederick Fay, Ph.D.
CONSUMER REP.
Larry Feinberg, Ph.D.
CORE
Marie Feingold
ARCA
Carl E. Hansen, Ph.D.
ARCA

Claude Myer
CSAVR
Michael Oliverio
NRCA
Daniel Smith
ARF
Patricia Whalen
ARCA

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

520 North Michigan Avenue - Suite 1504
Chicago, Illinois 60611

(312) 644-4329

② I have analyzed the new contract (1977) submitted by Natrisources and have noted the following cost changes. I am leaving the percentage column change up to you to figure out because I would like to hear from you as to your reaction to these changes. This will give you something to figure out so that you can get more involved with the reaction. The figures I quote are from the appendix to the contract submitted for year 1977 and the figures paid during the year 1976. These I got from the monthly financial statements submitted to me by Natrisources. If you have any questions about these figures I will gladly submit copies of these statements. I would very much like to have your written reactions to this information I am supplying you.

Item #	1976 Actual Cost	1977 Proposed Cost	% Change
Exhibit A			
II A	$2.85	$3.55	
II B	$15.00	$17.75	
III A	$35	$15.00	
B	$75	$90.00	
IV A	$10	$42	
B	.03	.10	
V	1.75	2.00	
VI	2.80	5.90 & 6.00	

Daniel C. McAlees, Ph.D., Chairman
ARCA and NRCA
Harold Rubin, Vice Chairman
ARCA
Florence R. Curnutt, Secretary-Treasurer
NRCA
Anne D. Crumpton
NRCA
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CRCE
Frederick Fay, Ph.D.
CONSUMER REP.
Larry Feinberg, Ph.D.
CORE
Marie Feingold
ARCA
Carl E. Hansen, Ph.D.
ARCA
Claude Myer
CSAVR
Michael Oliverio
NRCA
Daniel Smith
ARF
Patricia Whalen
ARCA

Exhibit C

ITEM	1976 ACTUAL COST	1977 PROPOSED COST	% Change
ADMINISTRATIVE OFFICER	$150 per day	$200 per day	
ACCOUNT COORDINATOR	$10 per hour	$100 per day	
DIRECTOR EDP Services	$10 per hour	$100 per day	
SECRETARY	$5.71 per hour	$70 per day	
CLERICAL (Typing Keypunching)	$5 per hour	$50 per day	
Federally-approved overhead rate to be applied to all invoices	60%	73.5%	

(This would mean that at the proposed rates the attendance of the 4 Natresource personnel at the 3 days of meetings would have cost us $1560 plus cost for each committee minutes at $40 per meeting and Commission minutes at $200 per meeting. This brings the cost close to $2000 per meeting before a Commissioner arrives at the meeting)

CAN the Commission afford these rate increases?

Sincerely,
Harold Rubin, CRC
Vice Chairperson CRCC

Dear Ted,

It was nice meeting you. I felt we were both committed to the same standards of delivery of service to consumers.

Harold

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

FINANCIAL STATEMENT

FOR THE MONTH OF November 1976

INCOME

Cash on hand June 30, 1976*	$ 50,881.03	
Income 7/1/76 to 10/31/76	10139.77	
Income 11/1/76 to 11/30/76	605.00	
TOTAL		$ 61,625.80

EXPENSES

Expenses 7/1/76 to 10/31/76	$ 17289.51	
Expenses 11/1/76 to 11/30/76	2798.25	
		$ 20087.76

EXCESS OF INCOME OVER EXPENSES $ 41538.04

*See Bank Reconciliation for outstanding checks at 6/30/76.
Prepared by Natresources, Inc.

EXPENSE STATEMENT

November 1976

	xpense Category	1976-77 Budget	Actual 4 Months	Actual November	Actual to Date	Actual vs. Budget
0	Commissioner expenses 75-76 paid 76-77	$ ---	$	$	$	$
1	Task Force 8/76	---				
2	Task Force 1/77	---				
3	Task Force (unsched)	---				
4	Comm/Comm mtgs 12/76	3,250.00				3250 00
5	Comm/Comm mtgs 6/77	3,250.00				3250 00
6	Committees 9/76	---				
7	Committees 3/77	1,550.00				1550 00
8	Committees (unsched)	---	1480 13	—	1480.13	(1480.13)
9	Examination printing	500.00	1107.50	—	1107.50	(607.50)
10	Cert printing/lettering	450.00	319.90	19.60	339.50	110.50
11	Other External printing	250.00	123.99	55.50	179.49	70.51
12	In-house printing	500.00	274.63	11.66	286.29	213.71
13	Postage	2,000.00	634.46	56.04	690 50	1309 50
14	Telephone	2,500.00	424.88	90.77	515.65	1984.35
15	Shipping/Monitors fees & exp/exam room rental	2,000.00	2946 50	—	2946 50	(946.50)
16	Office supp: consumable	1,200.00	13.73	15.75	29.48	1170.52
17	Office supp: non-consum	100.00		—		100 00
18	Professional fees (atty/acctnt/etc.)	1,000.00		—		1000 00
19	Insurance	3,000.00	1390 00	34.75	1424.75	1575.25
20	Convention/PR expense	1,000.00	850 33	580 00	1430.33	(430.33)
21	Miscellaneous	1,000.00	116.38	—	116 38	883 62
22	Refunds	---	66.50	—	66.60	(66 60)
	SUBTOTAL	$ 23,550.00	9749 03	864.07	10613.10	12936.90

	Expense Category	1976-77 Budget	Actual Months	Actual	Actual to Date	Actual vs. Budget
31	Natresources M/C Items developed	$ 1,125.00	$	$	$	$ 1125.00
32	Natresources Prep of exam/instruc	2,000.00	990.00	—	990.00	1010.00
33	Natresources Exam arrangements	500.00	1055.00	—	1055.00	(555.00)
34	Natresources Mailing/retn supplies	125.00	157.32	—	157.32	(32.32)
35	Natresources Ck-in exam materials	525.00		392.00	392.00	133.00
36	Natresources Scan/score/analysis	900.00		627.00	627.00	273.00
37	Natresources Prep/printing reports	2,000.00				2000.00
41	Natresources Application processing	4,000.00	1750.00	—	1750.00	2250.00
42	Natresources Meeting Arrangements	160.00	42.00	—	42.00	118.00
43	Natresources Meeting attendance	1,200.00				1200.00
44	Natresources Minutes/Highlights	500.00	240.00	—	240.00	260.00
45	Natresources Cert handling/mlg	400.00	516.25	7.50	523.75	(123.75)
46	Natresources Overhead/occupancy	1,000.00	387.34	558.51	945.85	54.15
xx	Natresources SUBTOTAL PAGE 2	$ 14,435.00	$ 513791	$ 1585.01	$ 672292	$ 7712.08
xx	Other Suppliers SUBTOTAL PAGE 1	$ 23,550.00	$ 9749.03	$ 864.07	$ 10613.10	$ 12936.92
XX	SUBTOTAL PAGES 1 & 2	$ 37,985.00	$ 1488694	$ 2449.08	$ 17336.02	$ 20648.98
51	Special Projects Registry	(8,100.00)*	1656.51	348.97	2005.48	(2005.48)
52	Special Projects Interim Lists	---	7.29	—	7.29	(7.29)
53	Special Projects Research (MSU)	250.00	172.32	—	172.32	77.68
	Special Projects Candidate Guide	150.00	566.45	—	566.45	(416.45)
	Special Projects UNC Item Analysis	280.00				280.00
xx	Special Projects SUBTOTAL	$ 680.00	$ 2402.57	$ 348.97	$ 2751.54	$ (2071.54)
	TOTAL EXPENSES	$ 38,665.00	$ 1728951	$ 2798.05	$ 20087.56	$ 1857744

*As noted in the Executive Committee report, expenses for and income from the Registry are not reflected in any of these statements.

INCOME STATEMENT

November 1976

	1976-77 Budget	Actual 4 Months	Actual November	Actual to Date	Actual vs. Budget
$15.00 Fees	$ 6,000.00	$ 2055.00	$ 465.00	$ 2520.00	$ (3480.00)
$30.00 Fees	12,000.00	6875.00	70.00	6945.00	(5055.00)
Interim Lists	---	14.60	—	14.60	14.60
Registry Orders	---	368.00	70.00	438.00	438.00
Interest	---	790.22	—	790.22	790.22
Other (minus Canadian disc)	---	36.95	—	36.95	36.95
TOTAL	$ 18,000.00	10139.77	605.00	10744.77	(7255.23)

MICHAEL C. KENT
Certified Public Accountant
1718 SHERMAN AVENUE
EVANSTON, ILLINOIS 60201
(312) 866-6660

Member:
American Institute of C.P.A.s
Illinois Society of C.P.A.s

November 22, 1976

To The Commissioners
Commission on Rehabilitation
Counselor Certification
520 North Michigan Avenue
Chicago, Illinois 60611

Gentlemen:

In accordance with your instructions, we have examined the Balance Sheet of the Commission on Rehabilitation Counselor Certification at June 30, 1976, and the Statement of Income and Expense for the fiscal year then ended. Our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records as we felt necessary in the circumstances.

In our opinion, the accompanying Financial Statements fairly present the financial condition of the Commission on Rehabilitation Counselor Certification at June 30, 1976 and results of operations for the fiscal year then ended, in conformity with generally accepted accounting principles consistently applied.

Michael C Kent

MICHAEL C. KENT

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

STATEMENT OF INCOME AND EXPENSES

FISCAL YEAR ENDED JUNE 30, 1976

INCOME		
Application Fees @ $15.00		$ 49,945
Field Review/Certificate Fees @ $30.00		132,824
Registry & Interim Lists		2,552
Interest		395
Miscellaneous		588
		186,304
EXPENSES		
Professional Unit Charges-Natresources, Inc.:		
Application Processing	$40,890	
Examination Development	29,958	
General, Administrative & Clerical	6,977	77,825
Field Review Costs:		
Printing	8,788	
Site Accomodations, Monitoring and Shipping	8,665	17,453
Meetings & Travel:		
Task Force	1,859	
Commissioners	15,914	17,773
Professional Fees		2,197
Office Expenses - Postage, Telephone, Supplies Etc. - Natresources, Inc.		17,265
Other Printing & Supplies		5,054
Special Projects - Registry & Interim Lists		5,765
Special Projects - Other		2,542
Convention and Promotion Expenses		1,862
Miscellaneous		2,002
		149,738
EXCESS OF INCOME OVER EXPENSES		$ 36,566

A G R E E M E N T

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

Parties: Commission on Rehabilitation Counselor Certification
Natresources, Inc.

Purpose: To define and set forth the terms of the continuing relationship between the parties concerning the operation of the Commission's Administrative office and the development, administration and evaluation of two Certification Examinations during 1977.

Definitions: For purposes of this agreement, the terms used in this document shall have the following meanings:

"CRCC" refers to the Commission on Rehabilitation Counselor Certification.

"Commissioner(s)" refers to one or more appointed and voting members of CRCC.

"N" refers to Natresources, Inc.

"Spring Examination" shall mean CRCC's Certification Examination tentatively scheduled to be administered on Saturday, April 23, 1977.

"Fall Examination" shall mean CRCC's Certification Examination tentatively scheduled to be administered on Friday, October 28, 1977. All deadline dates indicated in this Agreement concerning these Examinations, other than application deadline dates, shall be contingent upon CRCC's approval of these tentative Examination dates.

"Applicants" shall mean rehabilitation counselors who submit applications to sit for either the Spring or the Fall Examination.

"Candidates" shall mean rehabilitation counselors who qualify to sit for either the Spring or Fall Examination.

"M/C items" shall mean five-response, multiple choice items.

"F/T" refers to the field test of items during the Spring and Fall Examinations for potential inclusion in the 1978 Examinations.

"F/T items" shall mean those M/C items to be included in the Examinations for field testing purposes.

"ID number" shall mean a four or five-digit identification number assigned to each applicant.

"Task Force" shall mean the 1976-77 Task Force on Test Construction as designated by the Commission.

I. EXAMINATION SERVICES

A. DEVELOPMENT & MAINTENANCE

1. N shall provide appropriate staff and materials to train Task Force members as necessary to write M/C items for the 1977 and 1978 Examinations. N shall also be responsible for follow-up with Task Force members in order to assure an adequate supply of M/C and F/T items for the Examinations.

2. N shall be responsible for the editing and revision of M/C and F/T items written by the Task Force to meet accepted Examination standards.

B. PREPARATION

1. Field Tests of M/C items for the 1978 Examinations will be prepared and administered as part of the 1977 Examinations. At least 10% of M/C items included in each Examination shall be F/T items.

2. A M/C item file will be maintained by N to include a record of items used in previous Examinations and Field Reviews and the performance data appropriate to each item.

3. N will prepare the key for scoring of the Examinations for input to the computer programs for scoring and analysis of the Examinations.

4. Each item will be reviewed, typed, proofread and double-checked by N before printing of the Examination booklets.

5. N shall prepare photo-ready copy of Instructions to Monitors, instructions for Examination personnel and other materials related to smooth administration of the Examinations.

C. PRODUCTION

1. N shall arrange for printing the Examination booklets on a cost plus 15% basis, including sequential numbering for security purposes, with appropriate documentation of these costs to be submitted to the Commission.

2. Each Examination shall be designed in two forms or booklets. Each booklet shall contain 120 M/C items and an additional 30 F/T items, for a total of 150 items per form. Form 1 shall be used in the morning and Form 2 in the afternoon, for a total of 300 items per candidate.

D. MAILING AND RETURN OF EXAMINATION MATERIALS

1. A complete set of Examination supplies (including but not limited to Examination booklets, answer sheets, instructions to monitors, pencils, return envelopes for answer sheets addressed to N, return label for test materials) shall be mailed to each site by N for arrival at least five days prior to the administration of each Examination.

2. The monitors administering the Examination at each site are responsible for the immediate return of all answer sheets, Master Lists of Candidates and Admissions Passes to N within 5 days after the administration of each Examination. Mailing should be in envelopes provided with the Examination mailing.

3. All other Examination materials, including all used or unused Examination booklets, shall be returned to N within two weeks of the Examination dates.

4. N shall keep an accurate record of Examination booklets, by number, supplied to each site and shall verify the return, for security purposes, of all booklets supplied.

E. ADMINISTRATION

1. Adminstration of the Examination at each site shall be the responsibility of the monitor. Staff will be available by telephone at N's Chicago office before, during and after the Examination to answer questions of monitors and candidates.

2. N shall not assume responsibility for the security of the Examinations if CRCC permits more administration sites than can be monitored by N staff or Commissioner(s). However, at all Examination sites, N shall require that the monitor in charge sign a statement to the effect that the Examination booklet has not been reproduced or duplicated in any way either before, during or after the Examination.

3. In the event that N personnel are requested or required to monitor any or all of the Examinations, N shall be reimbursed for staff expenses incurred in such administration at rates set forth for Commissioner reimbursement in the Operations Manual.

F. RECEIPT, CHECK-IN AND VERIFICATION OF EXAMINATION MATERIALS

1. In addition to keeping an accurate record of numbered booklets mailed and returned, N will record delivery of the returned Examination-site packet;check in and verify answer sheets; remove stray marks and correct coding errors; follow-up on missing answer sheets by telephone; and duplicate damaged answer sheets.

2. N shall also record return of Admissions Passes and cross-check Admissions Passes with answer sheets and Master Lists of Candidates to verify each candidate's attendance.

G. SCORING AND ANALYSIS

1. N will perform optical scanning of each answer sheet for the production of a data deck; transfer the data deck to magnetic tape; hand-score a 2% random sample for verification of the optical scanning; pre-score the Examinations and analyze each item, removing those which do not meet appropriate statistical criteria; re-score the Examinations and generate candidate profiles, statistical conversion information and subtest summary tables.

2. The fieldtest will be scored separately and the results reported to the Examinations Committee for review and revision within a reasonable time prior to the development of the 1978 Examinations.

H. REPORTS

1. Candidate reports with individual profiles will be sent to the individual candidates and will include explanatory documents prepared by N on CRCC letterhead. The date for mailing of the profiles shall be as follows:

Spring Examination	June 6, 1977
Fall Examination	December 12, 1977

2. A Certification Examination Report to CRCC, documenting the Examination development and procedures and summarizing the results of each Examination with statistical tables and correlation data shall be presented to CRCC at its next regular meeting following each Examination.

* * * * *

I. ADMINISTRATIVE SERVICES

A. PROCESS OF CERTIFICATION (EXCLUDING EXAMINATIONS)

1. N agrees that it shall review each application received to determine if all required data and the application fee have been enclosed. If any enclosure requirements are not met, N shall return the application to the Applicant, noting deficiencies, within two working days of receipt.

2. If all enclosure requirements are met, N shall:

   (a) assign an I.D. number to the Applicant;

   (b) acknowledge receipt to the Applicant with two working days;

   (c) create a Master Record card for each Applicant with a record of pertinent application data, status and follow-up dates;

   (d) enter the Applicant's I.D. number in the Master File of Applicants, both numerically and alphabetically;

   (e) review the information on the application and enclosures to determine the Applicant's eligibility for certification under current Standards and Criteria.

      (1) Any Applicant who clearly meets current Standards and Criteria may be approved by N to sit for the Examination.

      (2) Any Applicant who clearly does not meet Standards and Criteria shall be so informed by N, with details, indicating the right of the Applicant to seek review by the Credentials Committee.

(f) contact Applicants for more information if data contained on applications and/or enclosures is not sufficient to make a judgment on Applicant eligibility.

(g) Prepare for Credentials Committee review a summary of Applicant data on any Applicant who does not clearly meet or clearly fail to meet current Standards and Criteria.

3. N staff shall attend all meeting of the Credentials Committee, recording Committee decisions and the rationale therefor, and shall communicate Committee decisions, with details, to individual Applicants as soon as practical following the Committee meeting. N shall advise all Applicants who are rejected by the Credentials Committee of the right of appeal to the Appeals Committee.

4. N shall prepare for Appeals Committee review the files of all Applicants who have notified N of their wish to appeal their rejection by the Credentials Committee.

5. N staff shall attend all meetings of the Appeals Committee, recording Committee decisions and the rationale therefor, and shall communicate Committee decisions, with details, to individual Applicants as soon as practical following the Committee meeting.

6. N shall mail to each Candidate reference forms in a format to be determined by CRCC and record the return thereof, reviewing each for content. The files of Candidates who receive one or more unfavorable references shall be prepared for Credentials Committee review.

7. Prior to the administration of each Examination, N shall prepare an Admissions Pass for each Candidate whose file is complete and mail the pass to the Candidate. Scheduled mailing dates are as follows:

Spring Examination (4/23/77)	April 1, 1977
Fall Examination (10/28/77)	October 8, 1977

8. After the administration of each Examination, N shall coordinate the returned Admissions Passes, answer sheets, and monitors' Master Lists of Candidates to verify the attendance of Candidates.

9. After each Examination has been scored and Candidate profiles prepared, N shall order a Certificate for each passing Candidate and mail the Certificates by first-class mail directly to each Candidate.

B. COMMISSION & COMMITTEE MEETING RESPONSIBILITIES

1. At the request of the Chairman, N shall make appropriate lodging and meeting room arrangements for any scheduled or especially called meetings of CRCC and any or all of its Committees.

2. N shall arrange meeting schedules which in so far as possible allow for as many Commissioners as possible to attend Committees of which they are members.

3. N shall notify all Commission/Committee members of meetings as far in advance as possible of scheduled meetings. Such notice shall include:

   (a) a preliminary agenda, items to be included having been determined by the Chairman in conference with N;

   (b) the time and place of all scheduled meetings, with individual agendas for Committee meetings if requested or necessary;

   (c) a form for each Commissioner to return to N indicating scheduled times of arrival, departure, and planeed attendance at each meeting;

   (d) any back-up data for meetings as requested by the Chairman and/or Committee Chairmen.

4. N shall prepare a folder for each Commissioner in preparation for each Commission meeting, which shall include an agenda, a current roster of Commissioners, an expense voucher, relevant reports, and all other material necessary to provide necessary background information.

5. N staff shall attend all meetings of the Commission, at which N's obligations shall be to:

   (1) present an Administrative Office report;
   (2) present an Examinations report;
   (3) record the attendance of Commissioners;
   (4) record accurate minutes of the meeting;
   (5) oversee any lodging/meeting room/catering arrangements;
   (6) reimburse Commissioners for expenses as directed and approved by the Secretary-Treasurer;
   (7) supply any other input in the form of reports or otherwise as requested by CRCC.

6. In addition, at the request of the Chairman and/or any Committee Chairman, N shall attend any Committee meeting, supply appropriate input and record minutes for distribution to all Commissioners.

7. At the conclusion of each Commission/Committee meeting, N shall prepare minutes for signature by the Secretary-Treasurer or any Acting Secretary and distribute to all Commissioners. In addition, N shall prepare and distribute to all sponsoring organizations a brief summary of the highlights of each Commission meeting.

C. GENERAL ADMINISTRATION

1. N shall act as the Registered Agent for CRCC and its offices as the Registered Office.

2. In the performance of its obligations under this Agreement N shall be guided by CRCC policies and guidelines as set forth in CRCC's Bylaws and Operations Manual.

3. N shall maintain a telephone number at its Chicago office solely for the business of CRCC and which shall be billed monthly to CRCC. N shall have staff available during normal business hours to handle telephone inquiries.

4. N shall maintain current rosters of Commission, Committee and Task Force members and supply copies of each to appropriate parties upon request.

5. N agrees that all communications between N and any other party concerning the business of CRCC shall be carried out in the Commission's name and/or on CRCC stationery.

6. N shall maintain in its offices an appropriate inventory of CRCC supplies, including stationery, applications, reference forms, etc., ordering the same after obtaining three printer's quotations and having such supplies billed directly to the Commission at cost. In addition, N shall compose and print any form letters which in its judgment are necessary to the efficient administration of CRCC, charging any printing directly to CRCC at cost.

7. N shall receive all correspondence directed to CRCC's Administrative Office, responding appropriately and economically to each; i.e., use of form letter if possible, individually prepared responses when necessary.

8. N shall maintain ongoing relationships with CRCC's legal counsel, accounting firm and insurance agency or agencies, assuring itself and CRCC of the propriety of CRCC's legal and financial status.

9. N shall maintain the CRCC checking account, a current and cumulative list of CRCC receipts and disbursements, a current listing of application and Examination fees by ID number, and any other accounting records deemed appropriate by N or by CRCC to the efficient operation of CRCC.

10. N shall maintain at its offices copies of CRCC's Articles of Incorporation, current Bylaws and Operations Manual, and all minutes, which shall be available for inspection at Commission meetings or at any other time as requested by CRCC.

III. PAYMENT

A. N agrees to perform fully and completely the services outlined in the above paragraphs according to the schedules attached at Exhibit A for Examination Services and Exhibit B for Administrative Services, which Exhibits are hereby made a part of this Agreement by reference.

B. N shall submit an itemized bill monthly to CRCC for professional services performed under Item *III.* A.

C. N shall also submit an itemized bill monthly to CRCC for out-of-pocket expenses incurred on behalf of CRCC.

D. N shall prepare checks as necessary in payment of CRCC's obligations for approval and signature first by the Secretary-Treasurer and then by the Administrative Officer.

E. N staff expenses incurred for attendance at any Commission/Committee meeting(s) shall be reimbursed at the rates set for Commissioner reimbursement as set forth in CRCC's Operations Manual.

IV. OTHER SERVICES

A. N agrees to provide any other services or undertake special project assignments concerning either the Examinations or administration, not heretofore described in this Agreement as requested by CRCC or by any Committee with Executive Committee approval in writing provided, however, that reasonable project definitions, guidelines and deadlines are agreed upon by CRCC and N.

B. Before undertaking any such service or special project, N shall provide an estimated cost therefor based upon Natresources Standard Personnel Rates as set forth on Exhibit C, which Exhibit is hereby made a part of this Agreement by reference. Out-of-pocket expenses incurred in the course of performing any such service or project shall be reimbursed by CRCC.

V. PROPERTY RIGHTS AND SECURITY

A. All materials developed by N for CRCC shall be owned 50% by CRCC and 50% by N, with the exception of computer programs which shall be the sole property of N.

B. All materials in the possession of N will be stored in N offices under secure conditions. N may retain a copy of any or all materials with the understanding that they will be kept confidential, except as otherwise arranged with permission of CRCC.

VI. STORAGE

All Examination and administrative materials developed by N for CRCC, other than sample copies, will be destroyed following the Examinations. N will maintain a history file of each Examination including one copy each of the Examination materials, the candidate profiles and the Examination report to CRCC. N will be responsible for the retention and storage of additional materials in any quantity only by separate arrangement with CRCC.

VII. CONTINUATION OF AGREEMENT

To provide for the continuation of service to be rendered by N under this Agreement, the parties hereto agree that negotiation for a new Agreement with respect to the 1978 Examinations shall begin on or about November 1, 1977, with the object of completion thereof prior to January 1, 1978.

VIII. EFFECTIVE DATE OF AGREEMENT

The terms of this Agreement, including obligations of the respective parties to perform hereunder, shall be effective from and after January 1, 1977.

IN WITNESS WHEREOF, the parties have caused this Agreement to be executed in duplicate as of the day and year written above.

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

Attest: _____ *By* _____
Secretary-Treasurer Chairman

NATRESOURCES, INC.

Attest: _____ *By* _____
Vice President President

EXHIBIT A

Examination Charges

I. Multiple Choice Items	
Creation of new items and revision of poor performance items (including Natresources attendance at Task Force meetings and necessary follow-up work with Task Force.)	$ 17.75 per item
II. Preparation of Examinations and Related Documents for Printing	
A. Review, typing, proofreading and double-checking of items in final examination format.	$ 3.55 per item
B. Preparation of Instructions	$ 17.75 per page
III. Examination Arrangements	
Selection and coordination of sites	$ 15.00 per site
Natresources' staff availability by telephone to respond to questions on Examination dates.	$ 90.00 per Examination date
IV. Mailing & Return of Examination Supplies	
A. Cost of handling, sorting, counting, and packing Examination booklets for shipment.	$ 42.00 per site
B. Answer sheets, pencils, chipboards and other supplies.	$ .10 per candidate
V. Receipt, Check-In & Verification of Exam Materials	
Including coordination and cross-check of answer sheets with Admissions Passes.	$ 2.00 per candidate
VI. Scanning, Scoring & Analysis (data processing)	
A. Candidates Answer Sheets	$ 6.00 per candidate
B. Field Test Items	$ 5.90 per item
VII. Preparation & Printing of Reports	
A. Reports (personal profiles) mailed to candidates	$ 2.45 per candidate
B. Examination Report to CRCC	$900.00 per Examination Administration

EXHIBIT B

Administrative Charges

I. Application Receipt and Initial Processing

Assignment of certification number, set up of file, creation of master card, follow-ups necessary to complete certification file, accounting, initial determination of disposition (approval, to Credentials Committee, denial). — $ 10.00 per application

II. Applications to Credentials Committee for Review

Preparation of summary, notifications to Applicant. — $ 2.50 per Applicant

III. Applications to Appeals Committee for Review

Preparation of summary, notifications to Applicant. — $ 2.50 per Applicant

IV. Commission and Committee Meetings

Arrangements and follow-up (notification to Commission members, hotel arrangements, preparation of necessary Administrative reports (not including Examination reports), preparation of Commissioners' folders, etc.)

Commission meetings	$ 60.00 per meeting
Committee meetings in conjunction with Commission meetings	$ 5.00 per meeting
Committee meetings not in conjunction with Commission meetings	$ 15.00 per meeting

Natresources staff attendance at Commission/ Committee meetings, with Executive Committee approval, daily charges to apply for full days, (i.e., 7 hours or more):

Administrative Officer	(Nattress)	$200.00 per day
Account Supervisor	(Street)	150.00 per day
Account Coordinator	(Redmon)	100.00 per day
Secretary	(Dreher)	70.00 per day

Composition, preparation and distribution of Commission highlights and minutes	$200.00 per meeting
Composition, preparation and distribution of Committee minutes	$ 40.00 per meeting

V. Certificates

Handling and mailing — $ 1.40 per candidate

VI. Overhead and Occupancy Charge — $ 20% of each invoice

EXHIBIT C

Natresources Standard Personnel Rates

The following are Natresources Standard Personnel Rates to be charged for services rendered in connection with special project assignments requested in writing by CRCC or any Committee with Executive Committee approval in writing. An estimate of total cost for any specific project will be provided for approval by the Executive Committee before the project is begun. Any out-of-pocket expenses incurred in the performance of any such assignment shall be reimbursed by CRCC in addition to personnel charges.

Administrative Officer	$200.00 per day
Director, Administrative Services (Account Supervisor)	$150.00 per day
Assistant, Administrative Services (Account Coordinator)	$100.00 per day
Director, Program Services	$125.00 per day
Director, Evaluation Services	$125.00 per day
Director, EDP Services	$100.00 per day
Secretary	$ 70.00 per day
Clerical (typing, keypunching, etc.)	$ 50.00 per day
Federally-approved overhead rate to be applied to all invoices	73.5%

EXHIBIT D

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

TENTATIVE SCHEDULE: 1977

January 1	Deadline date for receipt of applications and meeting Standards and Criteria for Spring Examination
February 5	Credentials Committee review of applications for Spring Certification Examination
March 5	Appeals Committee review of applications for Spring Examination
April 1	Mailing of Admissions Passes to Spring Candidates
SATURDAY April 23	ADMINISTRATION OF SPRING EXAMINATION
(March 6-9	APGA Convention)
June 6	Individual Candidate Profiles mailed (Spring Examination)
June 2-3	Committee Meetings
June 4-5	Executive Committee Meeting
July 1	Deadline date for receipt of applications and meeting Standards & Criteria for Fall Examination
August	Registry Supplement
August 7	Credentials Committee review of applications for Fall Examination
(September	NRA Convention)
September 11	Appeals Committee review of applications for Fall Certification Examination
October 8	Mailing of Admissions Passes to Fall Candidates
FRIDAY October 28	ADMINISTRATION OF FALL EXAMINATION
November 3	Notices of December Commission/Committee meetings mailed
December 8-9	Committee meetings
December 10-11	COMMISSION MEETING
December 12	Individual Candidate profiles mailed (Fall Examination)

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION

REPORT

CERTIFICATION EXAMINATION

SEPTEMBER, 1976

Prepared by

Natresources, Inc.
520 N. Michigan Ave.
Chicago, Illinois 60611

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Appendix C: Criteria for Deletion of Items

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION REPORT
SEPTEMBER EXAMINATION ADMINISTRATION

Introduction

The second Certification Examination of the Commission on Rehabilitation Counselor Certification was administered on September 17, 1976 to 224 pass/fail candidates. All participants who qualified under the grandfathering clause had been processed during the April examination.

The purpose of this paper is to describe the content of the examination, the administrative procedures, the statistical performance of the examination, and the performance of the candidates who sat for certification.

Description of the Examination

The pass/fail examination was composed of 240 items (235 of these were included in the final scoring) which were selected to represent the field of rehabilitation counseling. Content areas included: (1) type of client, (2) setting, (3) handicapping condition, (4) knowledge required, (5) services provided, and (6) measurement objective or cognitive skill level (recall, interpretive skills, problem solving and judgment). Since this examination was designed to be a "practice-based" measure, a large percentage of the items were problem orientated. Based upon the classification suggested by the authors, items were classified into subtest areas (see Classification Guide, Appendix A). Table 1 presents the names of the subtests and the number of items which were assigned to each subtest before and after deletions. Further comments concerning deletions may be found in the section concerning examination performance.

The examination was administered in two sections. The first section was administered in the morning and it contained 120 exam items plus 30 field test items for a total of 150 items. The items were equally distributed over the content areas. The second section of 150 items, equally distributed over the content areas, was administered in the afternoon. By using this method, candidates were provided the opportunity to demonstrate their knowledge in many areas at different times of the day and at different levels of anxiety and fatigue.

Table I

NUMBER OF ITEMS IN EACH SUBTEST BEFORE AND AFTER DELETIONS

Subtest Name	Before Deletions	After Deletions
Child	31	30
Adult	134	132
Aged	11	11
Physical Disability	72	71
Social Deviants	12	12
Emotional Disorders	29	28
Mental Retardation	19	19
Deaf	24	22
Blind	16	16
Medical Aspects of Disability	55	53
Occupational Information	24	23
Counseling Theory	22	22
Counseling Methods	21	21
Community Organizations	13	13
Vocational Adjustment	45	44
Evaluation & Assessment	31	31
Research Utilization	10	10
Rehabilitation Planning	38	38
Case Management	27	26
Information Dissemination	13	13
Vocational Counseling	18	17
Personal Adjustment Counseling	52	51
Group Counseling	6	6
Job Development	20	20
Vocational Assessment	29	28
Recall	30	29
Interpretive Skills	47	46
Problem Solving	139	137
Judgment	24	23
TOTAL EXAMINATION	240	235

The 60 field test items, which had not been used before, covered a variety of areas of rehabilitation counseling. Thirty of these items were placed at the end of Section I, and 30 at the end of Section II. Candidates were NOT scored on the field test items, rather, the items were scored in a separate analysis for the purpose of determining their statistical performance. Subsequently, the items have been studied for either use in a future examination or revision. The performance of the field test items did NOT influence the candidates' scores. The only purpose of the Field Test is continued refinement and development of the item pool available for the construction of examinations.

At each site candidates were asked to complete the Demographic Questionnaire. The demographic answer sheets will be computer scored, and the demographic information within the form will be tabulated, keypunched, and put on computer tape. The project is being conducted by Roger Livingston who is now associated with the University of Nebraska.

Examination Sites

The examination was administered at fifteen sites. A commissioner and/or a member of the Natresources staff monitored each examination site. The site list may be found in Appendix B.

Prescore Analysis

Following the examination, the answer sheets were checked in and prepared for computer scoring. The answer sheets were scanned and the first computer analysis (the prescore) was completed. The purpose of a prescore is to study the performance of items so that those which do not meet the criteria set for good performance may be deleted; thus, candidates are not penalized for poorly performing items.

The prescore analysis demonstrated that the examination performed exceptionally well. The keyed correct answer was most often selected by candidates which indicated that that the items were not ambiguous in wording or connotation. The point biserial correlations were also within the expected range, indicating that the items discriminated between the candidates who were well prepared for the examination and those who were not. Of the 240 items included on the examination, only five were deleted (See Appendix C). Of the five, one was clearly

ambiguous, and the other four performed at difficulty levels which were below that which was considered acceptable.

Scoring and Analysis

The Minimum Pass Level was established by Natresources staff on the basis of the prescore analysis. By design it should be one standard deviation below the mean. The "MPL" for this examination was set at 70.00 and pass/fail calculations were made on this basis.

After the deleted items were programmed into the computer, the examination statistics were recalculated. The mean (average) for the total examination was 77.86; the standard deviation (variance around the mean) was 6.74, and the reliability (internal consistency) was .85. This should be compared to a mean of 79.02, a standard deviation of 9.50 and a reliability of .93 in the first pass/fail examination.

The statistical performance of each subtest was satisfactory. Table II reports the means and standard deviations for each of the subtests included in this examination.

Examination Results

In September, 1976, 224 candidates sat for the Certification Examination. There were two repeats and both failed for the second time. Of the 224 candidates, 197 passed the examination and 27 failed the examination. In terms of percent, 88.0% passed, and 12.0% failed the examination as compared with 89.1% who passed and 10.9% who failed the previous examination.

Comments

Considering the performance of the examination and the candidates, the following summary comments are appropriate. First, the examination performed well as a measuring instrument. The difficulty levels and point biserial correlations were good. This indicates that the candidates were given a fair and well constructed test of their knowledge and expertise.

Second, it is of the utmost importance to maintain an active field testing procedure. The purpose of a field test is to test new items which may be included in future examinations. The only way to measure the statistical performance

Table II

MEANS AND STANDARD DEVIATIONS AFTER DELETIONS

Subtest	Percent Means	Percent S.D.
Child	73.35	9.82
Adult	80.59	7.04
Aged	77.62	12.82
Physical Disability	79.68	8.06
Social Deviants	80.98	11.37
Emotional Disorders	74.70	10.83
Mental Retardation	81.50	10.08
Deaf	83.00	9.48
Blind	69.82	11.91
Medical Aspects of Disability	75.23	8.68
Occupational Information	79.59	9.83
Counseling Theory	73.93	12.31
Counseling Methods	79.48	10.26
Community Organizations	78.82	11.83
Vocational Adjustment	79.49	8.68
Evaluation & Assessment	79.03	8.53
Research Utilization	77.17	14.94
Rehabilitation Planning	77.72	8.39
Case Management	78.56	9.44
Information Dissemination	76.34	12.06
Vocational Counseling	76.34	13.84
Personal Adjustment Counseling	77.91	8.96
Group Counseling	78.25	16.10
Job Development	79.01	10.34
Vocational Assessment	77.18	9.17
Recall	75.89	11.02
Interpretive Skills	78.02	8.41
Problem Solving	79.27	6.86
Judgment	71.61	10.89
TOTAL EXAMINATION	77.86	6.74

of items is to put them through the field test process. The field test method used on this first Certification Examination is probably the best. It taps a peer group which is most similar to the future candidates who will sit for the examination. Therefore, it is an accurate measure of the quality of the items as perceived by the group of rehabilitation counselors.

Third, it is logical to continue the demographic input. The data bank which has already been developed as the result of the Demographic Questionnaire has been useful in describing rehabilitation counselors. A continued collection of data will provide an easy updating mechanism. This information may then be made available to individuals interested in descriptive research in the area of rehabilitation counseling.

APPENDIX A

COMMISSION ON REHABILITATION COUNSELOR CERTIFICATION
CONTENT CLASSIFICATION GUIDE
DEVELOPED APRIL 28, 1975

I. CLIENT
- A. Child
  - 1. Preadolescent
  - 2. Adolescent 13-18
- B. Adult
  - 1. Young 19-39
  - 2. Middle aged 40-59
- C. Aged 60+
- D. General
- E. Not applicable

II. SETTING
- A. Rural
- B. Suburban
- C. Urban
- D. General
- E. Not applicable

III. HANDICAPPING CONDITION
- A. Physical disability
- B. Social deviants
  - 1. Addiction
  - 2. Public offenders
- C. Emotional disorders
- D. Mental retardation
- E. Deaf
- F. Blind
- G. Bicultural
- H. Neurologically impaired (L.D.)
- I. Other or general
- J. Not applicable

IV. KNOWLEDGE REQUIRED
- A. Rehabilitation philosophy, history and structure
- B. Medical and psycho-social aspects of disability

IV. KNOWLEDGE REQUIRED (Continued)
- C. Occupational information and the world of work
- D. Counseling theory
- E. Counseling methods
- F. Community organizations and resources
- G. Psychology of personal and vocational adjustment
- H. Evaluation and assessment
- I. Research utilization
- J. Other
- K. Not applicable

V. SERVICES PROVIDED
- A. Rehabilitation planning
- B. Case management (Coordination)
- C. Information dissemination
- D. Vocational counseling
- E. Personal adjustment counseling
- F. Group counseling
- G. Job development and placement
- H. Vocational and psychological assessment
- I. Staff development
- J. Supervision
- K. Other
- L. Not applicable

VI. MEASUREMENT OBJECTIVE
- A. Recall of factual information
- B. Interpretation of data (Problem identification)
- C. Problem solving
- D. Judgement

A P P E N D I X B

EXAMINATION SITE LIST

Site Location	Monitor	Scheduled Participants
Birmingham, Alabama	Grace Drain	7
Los Angeles, California	Bobbie Gurev	28
Denver, Colorado	Dan McAlees	7
Washington, D.C.	Marie Feingold	17
Hollywood, Florida	Lucy Redmon	16
Chicago, Illinois	Frost Liederbach	27
Boston, Massachusetts	Dan Smith	20
Minneapolis, Minnesota	Pat Whalen	9
New York City Area, New York	Bonnie Jacobi	55
Syracuse, New York	Bill Mynerd	18
Columbus, Ohio	Michael Oliverio	18
Dallas, Texas	James Dean, Jr.	10
Seattle, Washington	Steve Browning	12
Anchorage, Alaska	Individual	1
Honolulu, Hawaii	Individual	2

There were 246 scheduled participants. Of these, 22 were no shows.

A P P E N D I X C

Criteria for Deletion

The following items were not included in the final scoring of the September, 1976 Commission on Rehabilitation Counselor Certification Examination:

Section I: 116

Section II: 4, 6, 29, 108

Criteria for deleting items based upon statistical analysis:

Recall Level: (1 item) — a higher proportion of examinees responded to a response that was not the keyed best answer.

Interpretive Skills Level: (2 items) — the same proportion of the population responded to each distractor, indicating the item was worded ambiguously.

Problem Solving & Judgement Level (2 items): Two answers seemed to be equally correct, based upon the proportion of examinees responding to each. The point biserial correlations were low for the keyed best answer.