
Implications of Workforce Innovation and Opportunity Act (WIOA) in Rural, Frontier, and Territory Communities

30

Allison R. Fleming and Noel A. Ysasi

Overview

The Workforce Innovation and Opportunity Act (WIOA) provides a substantial update to the 1998 Workforce Investment Act (WIA) legislation. While not solely targeting job seekers with disabilities, or those residing in rural areas, the implications of this refined and more streamlined approach to workforce investment have great potential to benefit constituents with disabilities living in rural areas. Comments by President Obama and Vice-President Biden during the signing ceremony underscored the goal of the WIOA legislation: providing opportunity for American workers to gain skills that are applicable for jobs where they can earn a living wage (Office of the Press Secretary, 2014). The economic landscape has changed drastically since the late 1990s when WIA was passed. Going to work with a high school diploma is no longer sufficient to obtain a good job; postsecondary education or training is significantly linked to job stability and earning capacity (U.S. Bureau of

Labor and Statistics [BLS], 2014). The primary goals of WIOA are to connect training programs with the needs of employers, increase the accountability of training programs, and provide opportunities for on-the-job learning for youth and adults alike. For individuals living in rural, territory, and frontier communities, the economic picture is varied; some towns host industry and work opportunity and others do not. The primary features of WIOA that will be discussed in this chapter are the regional nature of WIOA and the implications for rural residents, along with implications for transition youth and veterans.

Learning Objectives

By the end of this chapter, the reader will be able to:

1. Understand the changes to service delivery associated with WIOA and the implications for rural, frontier, and territory communities
2. Explain how special populations such as transition youth, veterans, and clients of the workforce system will be impacted
3. Identify the benefits of WIOA to persons with disabilities living in rural areas

A.R. Fleming (✉)
Pennsylvania State University, Rehabilitation and Human Services, University Park, PA, USA
e-mail: apf508@psu.edu

N.A. Ysasi
College of Health and Human Services, Rehabilitation Services and Rehabilitation Counseling,
Northern Illinois University, DeKalb, IL, USA
e-mail: nyyasi@niu.edu

Introduction

The Workforce Innovation and Opportunity Act (WIOA) was signed into law on July 22, 2014, by President Barack Obama, and it took effect

on July 1, 2015 (US Department of Labor, n.d.). WIOA supersedes several previous laws guiding vocational rehabilitation and workforce services provided under the Workforce Investment Act (WIA) of 1998, The Wagner-Peyser Act, and the Rehabilitation Act of 1973, as amended. President Obama's comments regarding the WIOA legislation underscored the purpose of helping people, including those with disabilities, enjoy greater access to education, training, and employment opportunities and supports that will result in better employment outcomes in the future (Hoff, 2014).

Public vocational rehabilitation (VR) was established by legislation and has continued to be legislatively regulated for the entire history of the program. The services of VR agencies are well defined, focused specifically in assisting individuals with disabilities to prepare for, obtain, and maintain employment. VR services are considered "short term" in that once a client maintains employment for 90 days, his or her case will be closed. However, many individuals with disabilities require longer-term support even after securing employment. Many of the updates associated with WIOA encourage greater cooperation between the VR agencies and other related service providers, most directly educational systems, workforce systems, Medicaid, and state services for people with intellectual and developmental disabilities. In addition, provisions were enacted to clarify the definition of "competitive employment," close loopholes allowing for workers to earn subminimum wage, and emphasize the importance of agencies working directly with employers (Smith, Dillanlung-Aspillaga, & Kenney, 2016).

The updated regulations associated with the WIOA legislation have implications for state-level services to individuals with disabilities across VR, workforce, educational, and intellectual disability settings. The focus of this chapter will be to review the major changes associated with WIOA and then discuss the implications for rural areas. Particular client populations (e.g., transition youth, veterans) will also be highlighted.

History of the Workforce Innovation Act and Current Reauthorization of WIOA

The Rehabilitation Act Amendments of 1998 marked the first time a vocational rehabilitation initiative was imbedded within a workforce program, specifically the Workforce Investment Act of 1998 (WIA; P.L. 105-220). The law was intended to increase employment, retention, and earnings of participants, decrease welfare dependency, streamline administrative and service delivery functions, earmark resources, and enhance services for job seekers and employers (United States Department of Labor [DOL], 1998). Moreover, WIA encompassed (a) a "one-stop" delivery system, (b) contained a "work-first" approach stressing job-seeking and labor market reviews to assess the job seeker's readiness and needs, (c) provided direct assistance for identifying employment opportunities and job training to prepare for occupational readiness (i.e., interviewing and resume building), and (d) aided in developing appropriate skills to sustain employment (e.g., understanding work culture, appropriate dress attire, punctuality, conflict resolution, etc.). Prior to the signing of the law by President Clinton in 1998 and ultimately becoming effective in 2000, the development of this Act required nearly a decade of negotiating to restructure and unify the legislation before its enactment. The US Department of Labor, Employment and Training Administration (1998), outlines five titles structured within WIA as indicated in Table 30.1.

Since the Smith-Hughes Act of 1917, legislative efforts to enhance services for individuals with disabilities have been a historical battle. Though it became apparent through the enactment of WIA and inclusion of Rehabilitation Act Amendments, PWDs were an underrepresented population in dire need of government involvement that expanded and refined its current policies. To date, rehabilitation legislation has taken a century to evolve, yet new Acts can often hinder the population it is intended to serve. As will be seen in the proceeding section, the

Table 30.1 Workforce Investment Act (WIA)

Title	Services provided
Title I: Workforce Investment System	“One-stop” service delivery system whereby state and local communities deliver employment and training services within one common location, required accountability measures to ensure needs are being met by consumers, and provided array of services for disadvantaged youths, adults, and dislocated workers
Title II: Adult Education and Literacy Act	Adults are provided assistance in improving their educational and employment needs, to be self-sufficient, and improving educational attainment for their children
Title III: Amended the Wagner-Peyser Act of 1933	Integrates job search, job matching, and a one-stop system approach
Title IV: Rehabilitation Act Amendments	Amends programs within the Rehabilitation Act of 1978 and merges with state and local workforce development programs
Title V: General Provisions	Incentive programs for states exceeding performance standards under WIA, Adult Education Act, Perkins III, and transitional services

Workforce Innovation and Opportunity Act has provisions that undoubtedly improved upon WIA while simultaneously regressing to a period where educational requirements for state vocational rehabilitation agencies are no longer mandated to employ individuals with a graduate degree.

Workforce Innovation and Opportunity Act of 2014

On July 22, 2014, the passage of the Workforce Innovation and Opportunity Act (WIOA) was officially signed into law and became effective on July 1, 2015. The Act supersedes WIA, amends the Wagner-Peyser Act and the Rehabilitation Act of 1973, and is the first legislative reform in more than 15 years. A bipartisan and bicameral

effort, WIOA was designed to provide job seekers with more access to employment, education, training, and support services to excel in the workforce while incorporating the traditional philosophy of a “best fit” model in which the job seeker’s skillset is matched with that of the employer. WIOA (2014) was established to refine the workforce system by strategically improving collaborative efforts of the core WIOA and other federally funded programs that provide employment services, vocational rehabilitation, workforce development, and adult education and literacy programs. The following includes key elements of WIOA:

- The number of workforce investment boards are reduced.
- Youth with disabilities have increased opportunities to improve their skills in the workplace, provided with opportunities for career advising; VR agencies indicate how program funds are allocated for transitional services from secondary school to postsecondary education programs and competitive employment.
- Requirement of state and local plans (unified or combined state plan – discussed in the proceeding sections).
- Accountability measures are held to a higher standard for all core programs (outlined in proceeding sections).
- Expansion of employment and training services.
- Statewide set-aside philosophy – WIOA restores the statewide set-aside, but at the discretion of the state how allocation of funds will be distributed.
- WIOA establishes a strict budget for each fiscal year.
- Workforce development programs and states are accountable for meeting standards (i.e., successful employment outcomes) and collaborative efforts of state and federal evaluation efforts.
- Stronger emphasis on employer engagement (matching employers with skilled workers).
- Emphasizes competitive integrative employment (i.e., VR state plan gives priority to at-

risk PWDs of becoming unemployed unless provided with post-employment services).

Similar to WIA, the Workforce Innovation and Opportunity Act of 2014 consists of five titles but expands their services and requirements for states (see Table 30.2 for an overview of each title).

On April 2, 2015, the Department of Labor (DOL), Department of Education (ED), and other

Table 30.2 (continued)

Table 30.2 Workforce Innovation and Opportunity Act of 2014

Title	Key provisions
Title I: Workforce Development Activities	Includes the adult, dislocated worker, and youth programs; primary emphasis is to increase access to, and opportunities for individuals to receive, the employment, education, training, and support services necessary to succeed in the labor market specifically for individuals who encounter barriers to employment (i.e., PWDs and low-income adults)
Title II: Adult Education and Family Literacy Act	Supports transition from adult basic education to postsecondary education, postsecondary training, or employment, assists immigrants toward the improvement of necessary skills (i.e., mathematics, learning to read, write, and speak English), includes civics education and workforce training; innovative supports for reentry into society by investing and developing programs for incarcerated individuals through education and career advancement and supports families and communities by encouraging educational and skill advancement of parents and their children to improve economic conditions for the family
Title III: Amendments to the Wagner-Peyser Act	Continuance of the current act, aligns with state employment services as outlined in the unified state plan, assessment of performance for agencies offering services, stronger emphasis on developing connections between service providers and employment agencies

Title	Key provisions
Title IV: Amendments to the Rehabilitation Act of 1973	Aligns VR programs with other core programs of the workforce development system, strengthens VR program's focus on competitive integrative employment, and expands VR services for students and youths with disabilities for the purpose of achieving competitive integrative employment through enhanced coordination between VR agencies and local education agencies for individuals transitioning from school to postsecondary education and employment, and agencies who have special wage certificates allowing subminimum wages for PWDs; VR agencies must provide these individuals with career counseling and information and referral services to achieve competitive integrative employment
Title V: General Provisions	Compliance with Buy American Act; purchases of equipment or any product should only be American-made equipment and products; the head of federal agencies provides notice of any American-made products purchased for persons receiving financial assistance; prohibiting falsely labeled products as "Made in America"; transitional provisions; reduction of reporting burdens and requirements; and reporting on data

federal partnering agencies released five notices of proposed rule-making (NPRM) that delineates program-specific requirements of WIOA (U.S. Department of Education, 2016). These five NPRMs were made available for review to the public with most provisions taking effect on July 1, 2015. The plans were initiated by the ED, DOL, or both and consist of the following changes:

- NPRM (joint plan [ED and DOL]): Focuses on unified and combined state plans, assessments, and aspects of the "one-stop" system that falls under Title I

(continued)

- NPRM (DOL only): Addresses the changes to the adult, dislocated worker, and youth programs as authorized under Title I
- NPRM (remaining three NPRMs under ED only): Addressed changes to the Adult Education and Literacy Act (outlined in Title II of WIOA), Rehabilitation Act of 1973 (outlined in Title IV of WIOA), State VR Services program and the State Supported Employment Services program, Section 511 (Limitations on the Use of Subminimum Wages), Client Assistance, American Indian Vocational Rehabilitation Services, Protection and Advocacy of Individual Rights, Independent Living Services for Older Adults Who Are Blind programs, and grant programs under Title II of the Rehabilitation Act

Unified and Combined State Plans

On March 2, 2016, the governor of each state was mandated to submit either a unified or combined state plan to the Secretary of DOL detailing the state’s 4-year strategic proposal of their workforce system, a network of federal, state, regional, and/or local agencies which provide employment, education, training, and other necessary services contributing to successful employment outcomes (Washington State, Employment Services Department, 2014). For a state to be approved and receive funding, they must, at a minimum, incorporate six core programs which include the following: Adult Program, Dislocated Worker Program, Youth Program, Adult Education and Family Literacy Program, Employment Service Program authorized under the Wagner-Peyser Act, and the Vocational Rehabilitation Program. The *unified plan* encompasses the minimum aforementioned six core programs under WIOA, while the *combined state plan* includes all six core programs but comprises at least one or more of the following combined state partner programs (Table 30.3):

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006

Table 30.3 Six core programs for unified plan

Core programs	Identified title
Adult program	Title I of WIOA
Dislocated Worker Program	Title I
Youth program	Title I
Adult Education and Family Literacy Act	Title II
Wagner-Peyser Act Program	Amended Title III
Vocational Rehabilitation Program	Title I of the Rehabilitation Act of 1973 – amended by Title IV

Note: Adapted from the Office of Management Budget (2016)

- Temporary Assistance for Needy Families Program
- Employment and Training Programs and the Supplemental Nutrition Assistance Program
- Work programs authorized under section 6 of the Food and Nutrition Act of 2008
- Trade Adjustment Assistance for Workers Programs
- Jobs for Veterans State Grant Programs
- Senior Community Service Employment Program
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant and training activities
- Reintegration of Ex-Offenders Program (Office of Management and Budget [OMB], 2016, p. 2–3)

To ensure the success of WIOA, a more collaborative and robust delivery system has been implemented, specifically the provisions of the unified and combined state plan. WIOA reforms planning requirements previously governed by WIA to promote collaborative efforts among programs, to expand service delivery efficiency, and to align employers with skilled individuals. Moreover,

This reform promotes a shared understanding of the workforce needs within each State and fosters development of more comprehensive and integrated approaches, such as career pathways and

sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans. (OMB, 2016, p. 2)

Increased Role of VR Agencies in Transition

Perhaps the most discussed aspect of WIOA in VR agencies has been the requirement to increase the role of VR services in transition. The new regulation requires VR agencies to spend 15% of their funds on transition youth. This includes providing preemployment transition services and coordinating with local high schools and workforce development programs to support transition (Smith et al., 2016). What is a preemployment transition service? A preemployment transition service is a training or support that will help students before they leave high school, such as self-advocacy training, counseling on postsecondary options, work-based learning experiences, and other related services. Prior to WIOA, agencies were required to work with educational systems and provide consultation, as well as open cases for transition youth prior to graduation. This new regulation, particularly with the funding mandate, represents a significant increase in responsibility for VR agencies. One concern noted by several advocates (c.f., Hoff, 2014; Schroeder, 2014) is the possibility that the preemployment transition services could be provided in segregated settings; authors have suggested that advocates and service providers carefully monitor how these services are provided and push for integrated settings.

Preemployment transition services are conceptualized along a continuum and should be provided in collaboration with local education agencies (LEAs, e.g., school districts). Another major change is that preemployment transition services should be provided to any student who has a disability, not just students who have

applied for and been made eligible for VR services. Students may choose to apply for VR when they need what is referred to as “individualized or intensive” services (Hoff, n.d.-a, n.d.-b; Hadsdell, Kisiel, Wiese, McVoy, & Wright, n.d.). These preemployment transition services are not a way to reduce the LEA responsibility for services or provide funding for services that are already provided by special education funds. Counselors or VR representatives should attend Individual Education Plan (IEP) meetings when invited, to allow for closer and more collaborative and seamless services for youth exiting high school. VR agencies and LEAs must update any agreements or memorandum of understanding documents to reflect these new requirements (Hadsdell et al., n.d.).

Discussion Box

Arguably, one of the most critical changes for VR service delivery associated with WIOA was the requirement of increased financial investment (15%) in services for youth and preemployment transition services (PETS). While investing in youth and young adults at a critical point in their career development trajectory is useful and important, the fact that there has been no additional funding for VR services in light of this financial requirement is somewhat controversial. Like so many other questions about investment of public funds, this mandate begs the question, “how do we decide the best way to invest our public VR funding? Which people or populations are we prioritizing?” Previously, in public VR agencies, the priority was on individuals with “most significant disabilities” (MSD) identified through order of selection policies (OOS). These policies came about when agencies recognized that they did not have sufficient resources to be able to serve all potentially eligible persons with disabilities. State agencies used federal regulations to devise methods for prioritizing

those with MSD first and then serving individuals with significant disabilities (SD) and, if resources permitted, those with non-significant disabilities (NSD).

However, with the passing of WIOA, agencies now have another mandate to prioritize. With no additional funding, the question of how to reallocate funds will be left to each individual state agency. If agencies were already meeting this funding mandate by spending 15% of their service dollars on PETS, then there will be no need to shift funds from other programs or priorities. For states that were not already meeting the minimum funding standard, decisions will need to be made as to where that money will come from. What will the ramifications of this legislative mandate be for adult consumers?

Limitations on Subminimum Wage

Section 511 of WIOA (effective July 2016) includes increased limits on work in segregated settings (e.g., sheltered) where workers earn less than minimum wage (Schroeder, 2014). Prior to the enactment of this limitation, under the Fair Labor Standards Act (FLSA; US Department of Labor, n.d.) some employers had special wage certificates (called 14c certificates) that allowed for paying workers less than minimum wage under specific circumstances. These circumstances included workers “whose earning or productive capacities are impaired by a physical or mental disability, including those related to age or injury, for the work performed” (US Department of Labor, n.d.). The regulations highlighted workers with disabilities, homeworkers, and student learners as those who were covered under the FLSA. Section 511 of WIOA requires documentation that individuals with disabilities under the age of 24 have had the opportunity to work in an integrated setting before being placed in a segregated setting with pay that is less than minimum wage. Additionally, schools are prohibited from

contracting with subminimum wage providers (Schroeder, 2014). Individuals who are placed in segregated settings (of all ages) must be offered services such as career counseling and referrals to promote competitive employment opportunities at regular intervals (Department of Labor, n.d.).

Formal Cooperative Agreements: VR-Medicaid-IDD Agencies

WIOA also requires that VR agencies enter into formal cooperative agreements with several of their key partners: Medicaid and those agencies providing services to residents with intellectual and developmental disabilities (ID/DD agencies; Hoff, 2014). The primary issue was that VR services are considered “short term” – with a case closure occurring once an individual has held a job for 90 days. Some individuals, particularly those with ID/DD, may need longer-term supports to maintain their employment. Often, these longer-term services were provided through alternative mechanisms such as Medicaid waivers or supportive services to individuals with intellectual and development disabilities (IDD) and severe mental illness (SMI).

Historically, VR agencies operated with relative independence, despite areas of overlap with other disability services and the workforce development service system. In many cases, workforce services were assisting individuals with disabilities, and Medicaid funds and staff in agencies serving individuals with IDD and SMI were supporting employment efforts. Relationships between these agencies ranged in levels of formality, from cooperative agreements to collaboration among providers at the local level. The unfortunate consequence was variability in the level of cooperation between VR service providers and those initiating long-term supports. With the new requirement, VR agencies must work more closely with agencies providing the long-term supports. Note that mental health agencies were not included in this provision, which is a point of contention with several advocates as this population also benefits from long-term supports (Hoff, 2014; Schroeder, 2014).

Role of VR in the Workforce System

The broad message sent from the legislature with the passing of WIOA to VR and the workforce system was to “be better partners” (Hoff, *n.d.-a*, *n.d.-b*). The primary service delivery mechanism under the workforce system is the One-Stop Career Centers (sometimes referred to as American Job Centers), where people can obtain access to employment opportunities and training programs in one place (Hoff, *n.d.-a*, *n.d.-b*). These services are overseen by local workforce boards and are available to those with and without disabilities. They are primarily individual-directed with staff acting as resources and providing minimal assistance. Historically, these centers were not accessible and not staffed in such a way to support the needs of job seekers with disabilities. For example, the centers were located in buildings with clear architectural barriers, without assistive technology to allow for use of the computers or communication devices (e.g., phones, fax machines), and staff were completely unaware of issues related to job seeking and career development for persons with disabilities. In fact, many people who identified with disabilities were directed to utilize VR or other special disability services instead, even if they had the skills and self-direction to benefit from what was available and did not necessary need additional assistance. To address this issue, in the early 2000s the department of labor began funding states to build the “disability program navigator” initiatives, and 42 states participated in demonstrations projects as of 2009 (Department of Labor, 2010). Disability navigators were intended to be employees within the workforce system who were available to help individuals with disabilities seeking services to navigate the centers, address accessibility issues, and expand the systems’ ability to serve customers with disabilities through creating linkages and leveraging resources (DOL, 2009). While this initiative was discontinued prior to WIOA, it represented action toward the value of building a closer relationship between the VR and workforce development systems that is a large part of the WIOA regulations. In addition, VR agencies were required to include workforce partners in their

Comprehensive Statewide Needs Assessments and State Plans to be filed with the Rehabilitation Services Administration. The new requirement is that the core programs (including VR agencies, workforce system, Wagner-Peyser, dislocated worker programs, youth programs, and other community partners) will develop a unified or combined state plan rather than separate plans as was the case before WIOA.

With WIOA, another key update is the strategic coordination of these two “core” programs (e.g., the workforce system and VR) in helping workers develop the skills necessary to succeed in our labor market (Department of Labor, *n.d.*). Local workforce boards must ensure sufficient services and providers for individuals with disabilities, accessibility of the One-Stop Career Centers (American Job Centers) must be assessed annually, and workforce boards must develop strategies to support career pathways for individuals with disabilities. These changes represent a major increase in the visibility and priority of disability in the workforce system. By ensuring that all systems are better situated to serve individuals with disabilities, it is anticipated that federal and state employment services can become more streamlined and efficient in helping all residents obtain high-quality jobs and careers. There will no longer be the need to separate out individuals with disabilities into special and segregated services unless they require higher intensity (e.g., supported and customized employment, funding for disability related services) only available through the VR agencies.

Changed Performance Measures

Another major theme in WIOA was the need to raise the level of accountability of employment and training programs (DOL, 2016). In 2016, core programs are subject to what are called “common measures” for measuring performance. These measures represent expanded data collection responsibilities, including specific indicators such as credential and skill gain of program participants and the effectiveness of services to employers. These common measures will be

shared by all programs authorized under WIOA, and there will be adjustments applied based on local economic conditions. While some of the measures are the same as the previous requirements, there have been a few additions, and the timing of some measures has been shifted.

What will be measured? Well, as was the case before, workforce boards will need to report on the number of program participants who entered into unsubsidized employment and their retention. As a result of WIOA, this information will be collected after a lag of an additional quarter (e.g., entry into employment will be collected two quarters after exit instead of just one). This will require additional follow-up with program exiters and allow for a longer-term picture of the outcome of services. New pieces of information required for reporting include those related to skill gain and employment credentials. Long-standing employment data shows a clear connection between educational credentials (e.g., postsecondary employment) and earnings and employment stability (DOL, 2013). Boards will now need to report the percentage of participants who are enrolled in education leading to credential or employment and the percentage who obtain a recognized credential within 1 year of program exit (National Association of Workforce Boards, n.d.). For youth, the measure of literacy and numeracy gains has been eliminated, but new information must be collected about enrollment in education leading to credentialing and employment, as well as median earnings, and retention in training or employment with a 1 year follow-up requirement after program exit (National Association of Workforce Boards, n.d.). Finally, an indicator of the effectiveness in serving employers is now required, which is a completely new area of assessment under WIOA. The vision is that this data will be used to drive services and increase accountability of public programs so that taxpayers, policy makers, and consumers can better understand the value and effectiveness of employment and training services (US Department of Education, 2014). Workforce boards will be able to make informed decisions about contracts and alignment with outcomes under these common measures.

State VRC Educational Requirements

The state VR counselor minimum education requirements have been tied to, and fluctuated with, legislation over the years (Leahy, Chan, & Saunders, 2003). The 1992 amendments to the Rehabilitation Act resulted in an increase from a bachelor's degree to a master's degree for VR counselors. Particular service and activities were mandated to be performed by a qualified counselor (at the master's level), such as determining program eligibility and development of Individual Plans for Employment (IPE). However, estimates of VR counselors who did not hold a master's degree were as high as 30–50% even a decade after program implementation (Chan, 2003). With WIOA comes another change in educational requirements. Now, a master's degree is no longer required; instead, a counselor must hold at least a bachelor's degree from a field of study that is "reasonably related" to VR, including previously accepted disciplines such as rehabilitation counseling, social work, psychology and counseling, special education, as well as more ancillary fields such as business administration, economics, and human resources. While some feel that this reduced requirement opens the door of opportunity for prospective counselors with disabilities who were not able to obtain a master's degree with the help of a VR agency because of training limits (National Council on Independent Living, 2014), others lament the reduced training requirement and raise concern over the impact of services provided by professionals with inadequate preparation (McClanahan & Sligar, 2015). Since decades of role and function studies (c.f., Leahy, Chan, Sung, & Kim, 2013; Leahy, Szymanski, & Linkowski, 1993) have revealed that counseling is among the most common functions of a public VR counselor, it is of particular concern that individuals without counselor training will be considered qualified to provide this important service. Particularly for those trained in business administration, economics, and human resources, disciplines that are now included but were previously con-

sidered unrelated, counseling is not a function that individuals are trained to provide, nor are they familiar with the ethics and best practices required for maintaining safe and professional counseling relationships (McClanahan & Sliger, 2015). Particularly for those in these fields, it is unlikely that their educational preparation included a detailed study of the interaction between disability and work, as is the case with those who studied rehabilitation, disability, and other closely related fields. Research that is now somewhat dated revealed that counselors with a master's degree in rehabilitation counseling or a related field had better outcomes with individuals with most significant disabilities (Szymanski, 1991, Szymanski & Danek, 1992; Szymanski & Parker, 1989; Wheaten & Berven, 1994). Additional research is necessary under the new requirements to investigate the possible impact of counselor education on outcomes for VR clients, particularly those with the most complex barriers to work.

Linked to minimum education requirements is the Comprehensive System of Personnel Development (CSPD) that each state VR agency previously incorporated into their system of recruiting and training qualified staff. States had particular budgetary earmarks that they had to apply to help staff who did not meet the minimum education requirement access the necessary education to become qualified. In their state plan, they had to report the number of staff who did not meet the minimum educational requirements and explain the steps being taken to bring the staff up to the standard. This system allowed states who could not find qualified candidates to hire a bachelor's level person and then provide resources for them to obtain the necessary credentials. Counselors for special caseloads, such as bilingual/bicultural, clients who are deaf or hard of hearing, and those in rural areas where recruitment is difficult, often benefited from this program, and of course the benefit to the agency was that they had a mechanism for filling these critical vacancies. This also allowed for a career ladder, with staff hired as aides or administrative professionals who desired to move up to a counselor position to do so with the requisite training. With

the lowered educational requirements, the CSPD program will not have the same importance and role within the VR agency.

Implications for Persons with Disabilities in Rural Areas

Even though the regulations and policies associated with WIOA are still emerging, there are several implications for persons with disabilities living in rural areas. Two populations that are particularly impacted are transition-aged youth and veterans, including those with disabilities and who are homeless. The following section highlights specific implications of WIOA for these groups.

Implications for Transition-Aged Youth

Leaving high school and transitioning to adulthood is a major undertaking for youth, particularly those with disabilities. This is true for youth living in all areas of the country, including rural regions. It has been widely acknowledged that youth with disabilities lag behind their peers in postsecondary educational attainment, employment, and independent living (Sanford et al., 2011). Studies of youth in rural areas indicate that their post-high school graduation aspirations are similar to their urban counterparts, but some of the environmental barriers serve as an additional level of complication for realizing their goals (Weiss, Hutchens, & Meece, 2012). For many, pursuing postsecondary education means they must leave their home communities. Just like other professions, there is a shortage of qualified teachers in rural areas and reduced opportunities for programming that provides an advantage for students when applying for college and qualifying for scholarships and other merit-based forms of assistance. Advanced placement, dual enrollment in college classes, career and college counseling, internship and work programs, mentoring, and a range of available math and science college preparation programs are some examples

of opportunities not available in all rural schools (Weiss et al., 2012). Compounding this gap is the finding that students with disabilities in rural communities are less likely to have access to these programs even when they are available; save that for career exploration where students with disabilities reported higher levels of participation than their peers (Weiss et al., 2012).

For rural youth with disabilities, the enhanced requirement for preemployment transition services provided by VR agencies represents a major opportunity. One drawback of lack of access to some of the programs and services discussed earlier is that youth who are in the later grades (i.e., 11th or 12th) may not have a clear plan for what they will do after high school. The preemployment transition services are designed to be available to all students with disabilities, and general services such as planning for the future, learning self-advocacy skills, and identifying work opportunities early on are exactly the sort of programs that are included in this legislation and may fill a major gap in rural schools. In rural communities, if transition youth plan to stay after only attaining a high school credential, they will likely have limited work options and may be more vulnerable to layoff or cuts in employment because they have less experience than their older counterparts. One common challenge stated by counselors serving rural youth is the high reliance on disability benefits by the youth and their families. Some families have come to depend on the youth's benefit to cover basic needs for the family, such as food, rent, or medical care. Reliance on social security benefits is linked with region, where higher unemployment rates and concentrations of dangerous or physically demanding occupations (e.g., mining, manufacturing, agriculture) are associated with rural areas (McCoy, Davis, & Hudson, 1994). For youth, the issue of benefits is particularly startling, where if a young person starts receiving disability benefits because he or she is medically unable to work at 18, they are potentially signing up for a lifetime of poverty, unemployment, and higher risk for developing secondary mental and physical health conditions. Appalachia and the Mississippi Delta are two areas with historically elevated rates of

poverty, disability, and reliance on public benefits (McCoy et al., 1994). Social Security, in recognition of this special risk for youth, has invested in special services and demonstration projects in an effort to help young people avoid dependence on benefits. Programs include job training and placement, as well as benefits and financial counseling so that young adults and families can understand the big picture of the impact of work on earnings, benefits, and overall financial self-sufficiency (Camacho & Hemmeter, 2013). WIOA provides additional opportunity to expand services to transition youth that are useful and culturally relevant in rural communities.

From the workforce side, there are additional efforts to increase the focus on youth. Specifically, "out-of-school youth" or those who have dropped out of high school prior to completion of a diploma are a special population noted under WIOA. The workforce system has increased priorities for helping these youth toward career pathways and opportunities for workplace learning and adopting these practices on a wider scale (National Association of Workforce Boards, n.d.). For youth with and without disabilities, increasing their ability to obtain meaningful employment opportunities at this important life stage is thought to set them up for greater financial self-sufficiency over the lifespan. Youth who can access useful job skills and connect with employers have much higher chances of staying in the workforce and

Case Study

Ms. Federline is a rehabilitation counselor working with Houghton County district in the Upper Peninsula of Michigan. The counselor has been tasked with collaborating with the local workforce board and neighboring schools to design and implement preemployment transition services (PETS) at the Houghton High School specifically for students with disabilities. The closest One-Stop Career Center is a neighboring town located in Hancock, MI. Approximately 400

students attend Houghton High School; however, the number of eligible students for vocational rehabilitation (VR) services has yet to be determined. Ms. Federline has been meeting with some of the school administrators and a representative from the One-Stop Career Center to decide what types of PETS programming might be most useful. The school already has a relationship with Michigan Technological University and offers advanced standing courses for students who qualify. Ms. Federline has been considering if perhaps additional programs might benefit noncollege seeking students, particularly students with significant disabilities.

The counselor and her service partners from the school and the One-Stop Career Center decide to offer career decision-making workshops to students and save most of the spaces for individuals identified as having a disability. However, WIOA requires programs to be available to anyone interested in attending. The One-Stop Career Center representative will come in to one of the sessions, explain what services are available for job seekers, and allow students to visit the center if school administration and parental consent are given. For students identified as having a disability attending the career decision-making workshops, school staff will work with the counselor to start the referral process for students and their parents for VR services.

Discussion questions:

1. What potential concerns may the counselor, school staff and administrators, and students with disabilities experience, if the workshop is available to anyone interested in attending?
2. Apart from workshops, what additional services can Ms. Federline implement so students with disabilities and their families may become aware of additional services available?

3. What programs might benefit noncollege seeking students with a disability?
4. What additional recommendations would you give Ms. Federline to enhance outreach and marketing services for students with disabilities?

earning reasonable wages than those who rely on low-wage, low-security positions.

Implications for Veterans

Frequently, veterans experience transitional difficulties post-discharge, and these challenges can be even pronounced for those residing in rural communities. Some of the more common barriers include finding employment that fits their military experience, adjusting to a newly acquired disability, and receiving credit for their educational benefits. Though veterans receive exceptional military training (e.g., supervising and training experience) which can prove useful in the civilian labor force, available employment opportunities remain elusive. This is often because veterans' qualifications do not translate well because employers do not understand military terminology used in resumes creating a situation of skill mismatch with jobs. As a result, many veterans frequently find themselves working in unskilled positions generating low pay. The new act has made significant efforts to improve transitional services for persons who have served in the Armed Forces and their spouses. To guarantee the outset of this Act, each state, as previously noted, submitted their unified or combined state plan. This plan outlined their strategic proposal, including a detailed explanation of how they will provide priority services for veterans through the collaboration of federal and local agencies to streamline their process and improve upon existing methods to ensure veterans are able to maximize their benefits. Specifically, including information on expanding state and local resources to support veterans in finding and maintaining employment and offering priority services for those that qualify. Priority service is a benefit which offers eligible

veterans an expedited application as their claim is moved ahead of others for all DOL-funded programs (including WIOA). Under the Adult and Dislocated Worker program, “services” are administered to enhance opportunities for competitive integrated employment (i.e., training, education, vocational rehabilitation, etc.). Eligibility requirements include (a) having at least 1 day of active duty in the military (Army, Navy, Marines, Air Force, and Coast Guard), including Reserve units or National Guard activated for federal service, and (b) a veteran who did not receive dishonorable discharge status and was not deficient in basic skills. Veterans and their spouses also receive priority status if they are determined to be low income and demonstrate a need of additional education, career, and technical education or training to obtain and retain employment. Though the Bureau of Labor Statistics (BLS) in 2015 reported the unemployment rate was significantly low at 495,000 or 4.5 and 5.4 percent for males and females, respectively (DOL, BLS, 2016), a substantial number (i.e., 458,000 in 2007) have been removed from the workforce as a result of service-connected disabilities and/or from entering a postsecondary institution.

Generally, veterans enter postsecondary education for two reasons. First, the financial incentive of receiving approximately \$1700 a month for those who served 3 years or more often operates as a source of income. Second, and as previously mentioned, veterans experience difficulties in finding employment related to their military work experience requiring the need to obtain a postsecondary degree for competitive employment. As a result, the Secretary of Labor and other federal agencies announced the new provisions under WIOA to conduct research and assess how previous work experience can translate into postsecondary education credit. This new provision will allow veterans to maximize their benefits through the Montgomery G.I. Bill and Post-9/11 Veterans Educational Assistance and potentially further their educational attainment to a graduate degree.

To further improve conditions for veterans, the Department of Labor released a statement indicating the requirement of enrolling programs which serve homeless veterans within the public

workforce system through American Job Centers (AJCs). The primary purpose is to connect this population of veterans with workforce programs to ensure successful employment outcomes and thus reduce homelessness. Programs which are federally funded through the Wagner-Peyser Act or any WIOA title program (i.e., services for adults and dislocated workers) are required to implement this policy and submit performance information (i.e., participant characteristics, services, and outcomes). Apart from the requirement of grantees tracking and reporting outcomes, (a) programs are to provide trainings to staff on the various AJC services offered and their enrollment criteria, (b) homeless veteran programs and AJCs are to facilitate strong working relationships and learn what each program offers, and (c) programs are to ensure counselors present during the enrollment of a homeless veteran into a workforce program (DOL Publication No. 03–16).

Broader Potential Impact and Additional Policies

A major impact for rural communities of the WIOA changes is the initiatives allowing flexibility to regions and local workforce boards. It is clear that the labor market of rural, frontier, and territory communities is drastically different than more populated regions. The increased emphasis on local workforce boards and their mandates are an important opportunity for rural areas. Specifically, boards are required to connect with local employers, create innovative strategies to engage employers and promote effective services for their local area, complete comprehensive labor market analyses with information that is specific to their local region, and engaging partners in their communities.

The process of performing a labor market survey is central to the scope of practice for a rehabilitation counselor (Commission on Rehabilitation Counselor Certification, *n.d.*). A labor market survey is the process of gathering information about the availability of a given job in general and in the local economy. It helps to answer questions about the existence of jobs, the availability, minimum requirements and eligibility, and the typical range

of pay and benefits offered for the job in question (Lee, 2010). Information is also collected about the rate of turnover and openings. For rural, frontier, and territory communities, it is essential to have this kind of information prior to pursuing skill or credential development, which can help with career decision making. The local labor market is often limited, and individuals may need to decide between available positions or relocating for a position if so desired. In addition, one can decide if the time and monetary investment in training is worthwhile given the expected pay range and benefits. Regional information, such as educational and skill levels of workers, will also become available as a result of these analyses. One potential benefit of having this information readily available is that it can be shared with businesses as a way to help them recognize the human potential that resides in a given region or community.

The mandate to connect with local employers and increase services directly to employers also represents a major opportunity for rural communities. There is a push for local workforce boards to connect employers and industry with education programs to produce workers with desirable skills and qualifications (National Association of Workforce Boards, n.d.). In communities with specific industry (e.g., agriculture, manufacturing, service), it is possible for employers to help educators understand what training and preparation they desire workers to have and even collaborate on building certificate programs and on-site job experiences so that both parties benefit. A direct outcome of these kinds of relationships is that graduating students are more qualified for available positions, and industry has a greater applicant pool to draw upon for hiring needs.

Summary and Conclusions

The Workforce Innovation and Opportunity Act (WIOA) took effect on July 1, 2015. It represents a significant update to previous legislation that guided workforce development and employment services for individuals with and without disabili-

ties in the USA. WIOA is based on the idea that in a changing economic landscape, we need to shift our approach to ensuring that American workers are prepared for real, paying jobs that are available in their local or regional community. In order to accomplish these goals, the emphasis is on data-driven decision making, accountability, and greater collaboration across systems that serve individuals with and without disabilities all across the country. The emphasis on regional workforce boards and connections with local employers represents a significant opportunity for rural residents. Stipulations to prioritize services to special groups, including veterans and youth and young adults with disabilities, are also very relevant to rehabilitation counselors and related professionals. At the time of this writing, the regulations are available, and agencies, boards, and the rehabilitation community are working to alter the way service is provided to accommodate the new priorities in WIOA. Additional data will allow for greater evaluation of the impact of this important legislation.

Resources

- Bird, K., Foster, M., & Ganzglass, E. (2014). *New opportunities to improve economic and career success for low-income youth and adults: Key provisions of the Workforce Innovation and Opportunity Act (WIOA)*. Washington, DC: Center for Law and Social Policy.
- Brustein, M., Wurzburg, B. K., Spillan, S., & Auerbach, E. (2014). *The administrator and provider's guide to the Adult Education and Family Literacy Act (2014)*. Washington, DC: PLLC Publisher.
- California Workforce Investment Board. (2015). *Follow-up: Federal workforce investment grants* (Report No. 2015-508).
- Workforce Innovation and Opportunity Act of 2014, Pub. L. No. 101-513, § 102-103, Stat. 1425 (2014).
- US Department of Labor: Employment and Training Administration. <https://www.doleta.gov/wioa/>

National Association of Workforce Boards:

http://www.nawb.org/wioa_resources.asp

National Skills Coalition: [http://www.national-](http://www.national-skillscoalition.org/federal-policy/workforce-investment-act)

[skillscoalition.org/federal-policy/workforce-investment-act](http://www.national-skillscoalition.org/federal-policy/workforce-investment-act)

Learning Exercises

Self-Check Questions

1. Discuss the implications of WIOA on the employment of VR counselors in rural areas. How do you think the changed educational qualifications might impact agencies? What about clients?
2. Explain 2–3 benefits of WIOA for youth and young adults with disabilities.
3. Explain 2–3 benefits of WIOA for veterans.

Field-Based Experiential Assignments

1. Explain the importance of the Workforce Investment and Opportunity Act (WIOA) to someone who does not know anything about the law. See if you can answer questions and help the person understand the significance.
2. Visit a One-Stop Career Center in your local area, and learn what services are available to job seekers.
3. Interview a VR counselor who was practicing at the time WIOA was passed. Ask him or her about what has changed since WIOA became law.

Multiple Choice Questions

1. What is the difference between a unified and combined state plan?
 - (a) Unified state plan includes all six core programs but comprises of at least one or more combined state partner programs.
 - (b) Unified state plan encompasses the minimum of six core programs while the combined state plan comprises of six core

programs and at least one or more partner programs.

- (c) The governor is only required to submit a unified state plan and not a combined state plan.
 - (d) Differences between the unified and combined state plan are determined by the type of core programs for each.
2. When was the Workforce Innovation and Opportunity Act signed into law?
 - (a) March 7, 2013
 - (b) October 21, 2014
 - (c) July 22, 2014
 - (d) July 1, 2015
 3. Why was the Workforce Innovation and Opportunity Act established?
 - (a) To refine the workforce system?
 - (b) Increase accountability among federally funded programs?
 - (c) Provide job seekers with greater access to employment, education, training, and support services?
 - (d) All of the above
 4. What is the minimum educational attainment for a vocational rehabilitation counselor employed in a state VR agency?
 - (a) Associate's degree.
 - (b) Bachelor's degree.
 - (c) Master's degree.
 - (d) State agencies determine the minimum educational attainment.
 5. According to the new provisions of WIOA, state vocational rehabilitation agencies are able to employ rehabilitation counselors with what type of degree?
 - (a) Associate's degree
 - (b) Bachelor's degree
 - (c) Master's degree
 - (d) Doctorate degree
 6. What is a common occurrence for veterans seeking employment?
 - (a) Skill mismatch
 - (b) Employers not understanding military terminology used in resumes
 - (c) Lack of skilled training
 - (d) Insufficient educational opportunities
 - (e) Both a and b

Key

1. B
2. C
3. D
4. D
5. B
6. E

References

- Camacho, C. B., & Hemmeter, J. (2013). Linking youth transition support services: Results from two demonstration projects. *Social Security Bulletin*, 73(1). Retrieved on October 4, 2016, from: <https://www.ssa.gov/policy/docs/ssb/v73n1/v73n1p59.html>
- Chan, T. (2003). *Recruiting and retaining professional staff in state VR agencies: Some preliminary findings from the RSA evaluation study*. Washington, DC: American Institute for Research.
- Commission on Rehabilitation Counselor Certification. (n.d.). *Rehabilitation counseling scope of practice*. Retrieved on October 20, 2016, from <https://www.dol.gov/Whd/specialemployment/index.htm>
- Hadsdell, M., Kisiel, L., Wiese, D., McVoy, S., & Wright, C. (n.d.). *WIOA: Implications of the new Workforce Innovation and Opportunities Act on vocational rehabilitation services*. MI-TOP Institute. Retrieved on September 20, 2016, from: https://www.mitransition.org/sites/default/files/user_uploads/presentations/MI-TOP%20Institute%20June%202015%20-%20Segal/WIOA%20Implementation%20in%20Voc%20Rehab%20MI-TOP%20Institute%20June%202015.pdf
- Hoff, D. (2014). *WIA is not WIOA: What the new bill means for people with disabilities* (Institute Brief). Boston, MA: Institute for Community Inclusion.
- Hoff, D. (n.d.-a) *WIOA: What it means for transition* (MI-TOP Institute). Retrieved on September 20, 2016, from: https://www.mitransition.org/sites/default/files/user_uploads/presentations/MI-TOP%20Institute%20June%202015%20-%20Segal/WIOA%20-%20David%20Hoff%20Keynote%20MI-TOP%20Institute%20June%202015.pdf
- Hoff, D. (n.d.-b). *WIOA: What it is and what it means*. Boston, MA: Institute for Community Inclusion. Retrieved on October 4, 2016, from: [http://www.explorevr.org/sites/explorevr.org/files/files/Explore%20VR%20-%20WIOA%20Presentation\[1\].pdf](http://www.explorevr.org/sites/explorevr.org/files/files/Explore%20VR%20-%20WIOA%20Presentation[1].pdf)
- Leahy, M. J., Chan, F., & Saunders, J. L. (2003). Job functions and knowledge requirements of certified rehabilitation counselors in the 21st century. *Rehabilitation Counseling Bulletin*, 46(2), 66–81.
- Leahy, M. J., Chan, F., Sung, C., & Kim, M. (2013). Empirically derived test specification for the certified rehabilitation counselor examination. *Rehabilitation Counseling Bulletin*, 56(4), 199–214.
- Leahy, M. J., Szymanski, E. M., & Linkowski, D. C. (1993). Knowledge importance in rehabilitation counseling. *Journal of Applied Rehabilitation Counseling*, 24(4), 36–45.
- Lee, G. K. (2010). Vocational rehabilitation for people with disabilities. In J. H. Stone & M. Blouin (Eds.), *International encyclopedia of rehabilitation*. Available online: <http://cirrie.buffalo.edu/encyclopedia/en/article/128/>
- McClanahan, M. L., & Sligar, S. R. (2015). Adapting to WIOA 2014 minimum educational requirements for vocational rehabilitation counselors. *Journal of Rehabilitation*, 81(3), 3–8.
- McCoy, J. L., Davis, M., & Hudson, R. E. (1994). Geographic patterns of disability in the United States. *Social Security Bulletin*, 57(1), 25–36.
- National Association of Workforce Boards. (n.d.). *The Workforce Innovation and Opportunity Act: Driving innovation, collaboration, and performance*. Author. Retrieved on October 4, 2016, from: http://www.nawb.org/documents/Publications/WIOA_Overview-090314.pdf
- National Council on Independent Living. (2014). *Workforce Innovation and Opportunity Act: Frequently asked questions*. Author. Retrieved on October 4, 2016, from: <http://www.ncil.org/wp-content/uploads/2013/04/WIOAFAQs.pdf>
- Office of Management and Budget. (2016). *Required elements for submission of the unified or combined state plan and plan modifications under the Workforce Innovation and Opportunity Act*. Retrieved from https://www.doleta.gov/wioa/docs/WIOA_State_Plan_ICR_OMB_Passback_Plus_Supplement.pdf
- Office of the Press Secretary. (2014, July 22). Remarks by the president and vice president at bill signing of the Workforce Innovation and Opportunity Act. Retrieved from <https://obamawhitehouse.archives.gov/the-press-office/2014/07/22/remarks-president-and-vice-president-bill-signing-workforce-innovation-a>
- Sanford, C., Newman, L., Wagner, M., Cameto, R., Knokey, A. -M., & Shaver, D. (2011). *The post-high school outcomes of young adults with disabilities up to 6 years after high school. Key findings from the National Longitudinal Transition Study-2 (NLTS2)* (NCSE 2011-3004). Menlo Park, CA: SRI International.
- Schroeder, F. (2014). *Summary of changes in the Workforce Innovation and Opportunity Act*. Alexandria, VA: National Rehabilitation Association.
- Smith, T. J., Dillanlung-Aspillaga, C. J., & Kenney, R. M. (2016). Implementation of customized employment provisions of the Workforce Investment and Opportunity Act within vocational rehabilitation systems. *Journal of Disability Policy Studies*, early online. doi: 10.1177/1044207316644412.
- Szymanski, E. M. (1991). The relationship of level of rehabilitation counselor education to rehabilitation client outcome in the Wisconsin division of vocational rehabilitation. *Rehabilitation Counseling Bulletin*, 35(1), 23–37.

- Szymanski, E. M., & Danek, M. M. (1992). The relationship of rehabilitation counselor education to rehabilitation client outcome: A replication and extension. *Journal of Rehabilitation*, 58(1), 49–57.
- Szymanski, E. M., & Parker, R. M. (1989). Relationship of rehabilitation client outcome to level of rehabilitation counselor education. *Journal of Rehabilitation*, 55(4), 32–36.
- U.S. Bureau of Labor and Statistics. (2014). Employment projections. Washington, DC: U. S. Department of Labor. Retrieved from http://www.bls.gov/emp/ep_chart_001.htm
- United States Department of Labor, Bureau of Labor Statistics. (2013). America's youth at 25: School enrollment, number of jobs held, and labor market activity: Results from a longitudinal study. Washington, DC: U.S. Department of Labor. Retrieved from http://www.bls.gov/news.release/archives/nlsyth_03012013.pdf
- United States Department of Labor, Bureau of Labor Statistics. (2014). *Employment projections*. U.S. Department of Labor: Washington, DC. Retrieved from http://www.bls.gov/emp/ep_chart_001.htm
- U.S. Department of Education. (2014). *The Workforce Innovation and Opportunity Act overview of Title IV: Amendments for the Rehabilitation Act of 1973*. Retrieved on October 4, 2016, from: <https://www2.ed.gov/about/offices/list/osers/rsa/publications/wioa-changes-to-rehab-act.pdf>
- U.S. Department of Education. (2016). *Workforce Innovation and Opportunity Act*. Retrieved from <http://www2.ed.gov/about/offices/list/osers/rsa/wioa-reauthorization.html>
- U.S. Department of Labor. (1998). *Implementing the Workforce Investment Act*. Retrieved from <http://www.usworkforce.org>
- U.S. Department of Labor. (2009). *Disability program navigator initiative: Fact sheet*. Retrieved on October 4, 2016, from: https://www.doleta.gov/disability/onepagereports/DPN_FACTSHEET_October2009.pdf
- U.S. Department of Labor. (2016). *WIOA & WIA performance related questions*. Retrieved on October 4, 2016, from: <https://www.doleta.gov/performance/guidance/qa.cfm#WIOA%29>
- U.S. Department of Labor. (n.d.). *Workforce Innovation and Opportunity Act: Limitations on use of subminimum wage notice of proposed rulemaking. 34 CFR Part 397*. Retrieved on October 4, 2016, from <https://www.dol.gov/odep/pdf/WIOALimitationsUseOfSubminimumWage.pdf>
- U.S. Department of Labor, Bureau of Labor Statistics. (2016). *Employment situation of veterans - 2015*. Retrieved from <http://www.bls.gov/news.release/pdf/vet.pdf>
- U.S. Department of Labor, Employment and Training Administration. (1998). *Workforce Investment Act of 1998*. Retrieved from <https://www.doleta.gov/usworkforce/wia/plaintext.pdf>
- U.S. Department of Labor, Employment and Training Administration. (2010). *Disability navigator program initiative*. Retrieved October 24, 2016, from https://www.doleta.gov/disability/new_dpn_grants.cfm
- Washington State, Employment Security Department. (2014). *Workforce Innovation and Opportunity Act: An overview*. Retrieved from <https://esdorchardstorage.blob.core.windows.net/esdwa/Default/ESDWAGOV/newsroom/WIOA-Overview-and-Appendices-9-15-14.pdf>
- Weiss, M. P., Hutchins, B. C., & Meece, J. L. (2012). The postsecondary education plans of rural youth with disabilities and their nondisabled peers. *Career Development and Transition for Exceptional Individuals*, 35(3), 180–189.
- Wheaten, J. E., & Berven, N. L. (1994). Education, experience, and caseload management practices of counselors in a state vocational rehabilitation agency. *Rehabilitation Counseling Bulletin*, 38(1), 44–58.
- Workforce Innovation and Opportunity Act of 2014. (2014). Pub. L. No. 101-513, § 102-103, Stat. 1425.