

i. Comprehensive System of Personnel Development.

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. Analysis of current personnel and projected personnel needs including—

A. The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and

B. The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;

C. Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

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WVDRS is committed to providing a comprehensive system of personnel development (CSPD) that complies with Section 101(a)(7)(A) of the Rehabilitation Act Amendments of 1998 and Section 721(a)(7)(A) of the Rehabilitation Act, as amended by the Workforce Innovation and Opportunity Act (WIOA) of 2014. Members of the State Rehabilitation Council are afforded the opportunity to review and comment upon this entire section, particularly the WVDRS plan for recruitment, preparation, and retention of qualified personnel, agency personnel standards, and staff development needs and activities.

Provisions of this section should assist in recruiting and retaining qualified staff members to ensure skilled personnel are available to provide rehabilitation services to individuals with disabilities. Furthermore, these endeavors will help ensure an improved level of competence and expand and improve vocational rehabilitation services for individuals with disabilities, especially those with the most significant disabilities, allowing them to reach employment.

The Human Resources Unit is primarily responsible for performing WVDRS personnel administration activities in keeping with guidance from the West Virginia Division of Personnel (WVDOP), Rehabilitation Services Administration, Social Security Administration, and other appropriate bodies. The Quality Assurance (QA) Unit also works closely with the Field Services Unit to ensure quality and timely training for new field counselors and rehabilitation services associates (RSAs).

The following narrative describes the WVDRS CSPD and policies, procedures, and activities relating to the establishment and maintenance of standards to ensure that personnel needed within WVDRS are appropriately and adequately prepared and trained for WVDRS operations.

WVDRS Data System on Personnel and Personnel Development Needs

Statistics and information utilized for personnel planning are maintained within the Human Resources Unit. WVDRS administrators can review salary, pay grade, job title, reporting unit, and personal employee information. Such information is available to WVDRS Assistant Directors and District Managers who use it for planning, hiring negotiations, and pay equity. WVDRS retiree information may also be obtained from these databases.

The Human Resources Senior Manager periodically (at least monthly) maintains and provides statistical data to the WVDRS Director. The data includes a list of the number of individuals under various classifications who are employed by WVDRS in the provision of rehabilitation services, as well as a ratio of the number of counselors to the number of consumers served each year. WVDRS estimates the ratio of consumers served (12,665) to the number of counselors (76) will be 167 in Program Year (PY) 2026.

Each year, the WVDRS Director receives a summary report that estimates and projects the number of such personnel that will be needed during the next five-year period. In November 2025, WVDRS had 76 counselors in various offices across the state. Of the 76 counselors, WVDRS had 29 Rehabilitation Counselors, 24 Senior Rehabilitation Counselors, 10 Certified Rehabilitation Counselors, and 13 Rehabilitation Counselor Trainees. WVDRS believes its existing counselors and field staff members are needed to provide services to consumers who are currently in the WVDRS system.

WVDRS had several unfilled positions as of November 2025: 5 Rehabilitation Counseling positions, 3 Senior Rehabilitation Counselor positions, 3 Certified Rehabilitation Counselor positions, and 2 Rehabilitation Counselor Trainee positions. Each unfilled position is being used to expand the number of field counselors, when needed.

A breakdown by personnel category, including the number of personnel in relation to the estimated number of individuals served in PY 2026, is as follows (information current as of November 2025):

- Rehabilitation Counselors: 29 total positions (including 7 vacancies, shared with Rehabilitation Counselor Trainee), and 12 projected vacancies over the next five years. The ratio of individuals to be served to the number of Rehabilitation Counselors is 437.
- Senior Rehabilitation Counselors: 24 total positions (including 3 vacancies), and 14 projected vacancies over the next five years. The ratio of individuals to be served to the number of Senior Rehabilitation Counselors is 528.
- Certified Rehabilitation Counselors: 15 total positions (including 3 vacancies), and 9 projected vacancies over the next five years. The ratio of individuals to be served to the number of Certified Rehabilitation Counselors is 844.

- Rehabilitation Counselor Trainee: 20 total positions (including 7 vacancies, shared with Rehabilitation Counselor), and 7 projected vacancies over the next five years. The ratio of individuals to be served to the number of Rehabilitation Counselor Trainees is 633.
- Fiscal personnel: 9 total positions (including 0 vacancies), and 4 projected vacancy over the next five years. The ratio of individuals to be served to the number of Fiscal personnel is 1,407.
- Administrative Services personnel: 6 total positions (including 3 vacancy), and 2 projected vacancies over the next five years. The ratio of individuals to be served to the number of Administrative Services personnel is 2,111.
- Field Services personnel: 161 total positions (including 7 vacancies), and 42 projected vacancies over the next five years. The ratio of individuals to be served to the number of Field Services personnel is 79.
- Support Services personnel (e.g., human resources, rehabilitation technology unit): 42 total positions (including 3 vacancies), and 15 projected vacancies over the next five years. The ratio of individuals to be served to the number of Support Services personnel is 302.
- Information Technology personnel: 6 total positions (including 1 vacancies), and 1 projected vacancies over the next five years. The ratio of individuals to be served to the number of Information Technology personnel is 2,111.
- Other personnel (e.g., vocational instructors, technical analysts): 19 total positions (including 1 vacancies), and 13 projected vacancies over the next five years. The ratio of individuals to be served to the number of other personnel is 667.

WVDRS expects to see an increase in the number of consumers in its caseload system, from 13,304 individuals in PY 2024 to a projected 13,932 individuals in PY 2029. WVDRS administrators believe that the expected future caseload size will be managed by existing counseling personnel and the gradual filling of the 7 vacant counselor positions over the next five years. Additionally, WVDRS employs 45 RSAs to assist Counselors with their caseloads in order to more efficiently meet the needs of the increasing number of consumers.

The following information presents a range of the number of counselors and other agency personnel projected to leave WVDRS employment after becoming eligible for early retirement under the West Virginia Public Employees Retirement System by PY 2029. Of the 15 counselors who will be eligible, there will be 3 Rehabilitation Counselors, 8 Senior Rehabilitation Counselor, and 4 Certified Rehabilitation Counselors; no Rehabilitation Counselor Trainees are projected to retire by PY 2029. WVDRS continues to experience a gradual retirement of counselors and other personnel. The agency expects this trend will continue over the coming years.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Counselor (includes four distinct counselor position categories, see narrative for detailed breakdown)	76	83	90
Administrative (includes fiscal and IT personnel, see narrative for detailed breakdown)	17	18	23
Support Services	39	39	38
Field Services	154	164	171
Other	15	17	19

D. Ratio of qualified VR counselors to clients:

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E. Projected number of individuals to be served in 5 years:

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2. Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:

A. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

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WVDRS annually collects information from higher education institutions that provide training to prospective rehabilitation personnel. Based on information provided by West Virginia University (WVU) and Marshall University, WVU reports 15 students enrolled in the Clinical Rehabilitation and Mental Health Counseling graduate programs in the Fall 2025 semester and 27 graduates in the 2024-2025 academic year. For the Counseling graduate program, WVU reports 109 enrolled students for Fall 2025 and 27 graduates during the 2024-2025 academic year. For the Social Work program, WVU has an approximate enrollment of 301 students in Fall 2025 and 132 graduates in the 2024-2025 period. Marshall University reported 120 students in its Social Work programs during the Fall 2025 semester and 45 graduates during the 2024-2025 academic year.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
West Virginia University	Clinical Rehabilitation and Mental Health Counseling	15	13
West Virginia University	Counseling	109	27

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
West Virginia University	Social Work	301	132
Marshall University	Social Work	120	45

B. The VR agency's plan for recruitment, preparation and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR agency and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

WVDRS Recruitment Efforts

WVDRS will continue its efforts to recruit and advance employees of traditionally underrepresented groups such as people with disabilities, seniors, women, and members of racial or ethnic minority groups.

In PY 2025, WVDRS continued efforts to recruit with several postsecondary institutions in West Virginia. Through a partnership with West Virginia University, WVDRS is providing unpaid internship opportunities for graduate students in several programs of study, including Clinical Rehabilitation and Mental Health Counseling. WVDRS is also working with West Virginia State University, one of the state's historically black colleges and universities, to provide internship opportunities for its students. WVDRS allows up to three interns per district for a total of 18 interns possible each semester (Spring, Summer, and Fall). Interns must express interest in vocational rehabilitation and be in a bachelor's- or master's-level program with a vocational rehabilitation-related degree to be considered. WVDRS works with each university to comply with their program requirements to the extent possible, while providing real-world training similar to what the Rehabilitation Counselor Trainee receives.

In addition to offering internships, WVDRS posts all permanent positions available to the public on Handshake (<https://joinhandshake.com/employers/>). Handshake is connected to each postsecondary institution in West Virginia and allows WVDRS job postings to be seen by current students and graduates.

WVDRS Re-training Efforts for Existing Rehabilitation Professionals

WVDRS is in full compliance with the CSPD requirement and its standard to employ only rehabilitation counselors who (1) possess a master's degree, or (2) are employees who have two years of full-time or equivalent part-time paid experience in the position of Rehabilitation Counselor Trainee. As stated above, WVDRS makes no exceptions to the state standard when hiring new rehabilitation counselors. Therefore, WVDRS provides for existing personnel to receive the training necessary to meet requirements of the state standard.

As part of its non-discriminatory employment practices, WVDRS ensures that all personnel are selected for employment without regard to race, color, religion, sex (including pregnancy, sexual

orientation, or gender identity), national origin, age (40 or older), disability, and genetic information (including family medical history), and the agency has formally adopted this policy of non-discriminatory employment practices.

C. Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:

- i. Particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and
- ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

Staff Development and Training Activities

The selection of WVDRS participants for training activities is based upon documented organizational, unit, or individual training needs. Training programs will be provided for all classes and types of staff members on an internally assessed priority basis. Particular emphasis is placed on programs addressing assessment, vocational counseling, job placement, policy and procedure, ethics, and rehabilitation technology. WVDRS does not discriminate in the selection of trainees for these programs based on age, sex, religion, disability, and national or ethnic origin.

WVDRS is committed to utilizing only institutions or training facilities that are accessible programmatically and architecturally free of other barriers with respect to trainees with disabilities. In addition, WVDRS will ensure that program materials are accessible in the most appropriate format for all participants with disabilities (assistive communication devices, interpreters, large print, audio tapes, Braille material, etc.). The technology to ensure these accommodations is available through various support units within WVDRS. Moreover, to promote equal access for individuals with disabilities in facilities of higher education, WVDRS houses a rehabilitation counselor on campus at Marshall University and West Virginia University.

Typically, the majority of the training needs are met through local training and the agency's annual State Training Conference. WVDRS staff also participate in other training opportunities, when appropriate, through institutions of higher education, particularly those receiving funds from the Rehabilitation Services Administration to train rehabilitation professionals. This is to ensure that personnel needed within WVDRS are appropriately and adequately prepared for employment. In 2022, 20 WVDRS staff participated in Pre-ETS training provided by West Virginia University Research Corporation through an RSA Innovative Training program grant.

Throughout PYs 2024 and 2025, WVDRS continued to utilize a group training approach for newly hired counselors and RSAs; 4 new counselors and counselor trainees and 14 RSAs were trained during PY 2024, and 1 new counselor no RSAs were trained during PY 2025 through October 2025. The training is led by QA Unit staff members and consists of multiple sessions, provided on an as-needed basis for new hires. The training begins with introductory materials, as well as training on

case management, service provision, and agency policies and procedures. Later sessions cover Decision Tree Training, detailing appropriate casework practices from referral to closure. In addition to the training, as part of their NCT/RSA module training, new hires receive a CRP services overview and information about the agency's Rehabilitation Services Programs Unit and a tour of their work area(s), including the Rehabilitation Technology Unit. This approach ensures that all rehabilitation counselors and paraprofessionals receive standardized and accurate training.

QA Unit staff members and branch office managers conduct regular case record reviews to ensure compliance with federal, state, and agency casework standards. Any deficiencies identified from the reviews are addressed through appropriate training.

All WVDRS-sponsored programs provide continuing education credits that assist WVDRS CRCs, Licensed Professional Counselors, and members of other certified groups to maintain or obtain their certification. WVDRS has received approval authority from the CRCC to provide CRC continuing education credits for training programs meeting CRCC criteria.

WVDRS managers and supervisors also attend management training events to meet the requirements for the West Virginia Division of Personnel Policy 18, which mandates specialized training for all supervisors and managers. New managers and supervisors are required to take eight classes in their first two years. During PY 2024, 32 Managers or supervisors participated in a total of 44 DOP-18 training courses.

In June 2022, WVDRS held a WIOA Partners Conference in Morgantown, WV. Thirty-three partner agencies were represented, including representation from WV Combined State Plan agencies, with a total of 216 participants. This conference was followed by the WVDRS State Conference, also held in Morgantown, WV, with 220 participants. In June 2023, WVDRS held a Statewide Conference in Morgantown, WV, with 200 staff members in attendance and with 16 exhibitors from around the state. In September 2023, WVDRS held a Clerical Conference at its Administrative Office in Nitro, WV; 52 staff members attended this conference. These conferences help ensure that all staff members are connected to the overall mission and vision of the agency.

WVDRS staff confront the challenge of refining and improving their skills and knowledge while dealing with the current explosion of knowledge, technology, and treatment modalities. WVDRS will continue to make intensive efforts to provide ongoing information that will ensure the skills of WVDRS employees are responsive to the needs of the people they serve.

With respect to training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998, WVDRS maintains a working relationship and a formal memorandum of understanding with the West Virginia Assistive Technology System (WVATS). In West Virginia, the WVATS, under the Center for Excellence in Disabilities at West Virginia University, is the administrator of the assistive technology grant. WVDRS is also represented on the West Virginia Assistive Technology Board and works with WVATS in a number of ways, including:

- Maintain an updated resource database for Assistive Technology services in West Virginia.

- Participate in special projects (i.e., finding and advocating for accessible recreational resources).
- Provide information resources, awareness, and training for consumers and professionals in assistive technology services and devices.
- Provide information to WVATS partners regarding WVDRS and other disability-related subjects; and
- Participate as a member on an interagency team, Partnerships in Assistive Technologies, with a focus of interagency collaboration for the provision of Assistive Technology training and conferences.

3. Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including—

A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

To ensure a high standard of competency and credentials for its qualified rehabilitation professionals, WVDRS has established job classifications. The lowest standard for Rehabilitation Counselors requires a master's degree; or two years of experience as a Rehabilitation Counselor Trainee. Senior Rehabilitation Counselors require: (1) a master's degree; and (2) two years of full-time or equivalent part-time paid professional experience in vocational rehabilitation counseling.

Certified Rehabilitation Counselors require: (1) a master's degree; (2) current national certification as a Certified Rehabilitation Counselor or Certified Vocational Evaluator or current West Virginia licensure as a Licensed Professional Counselor; and (3) at least three years of full-time or equivalent part-time paid professional experience as a rehabilitation counselor.

WVDRS has established the position of Rehabilitation Counselor Trainee. An employee in this position is under direct supervision and performs work at the entry level in a training capacity, which is intended to qualify the employee for specific duties for this position. The employee may become eligible for the position of Rehabilitation Counselor after two years of full-time or equivalent part-time paid experience in the position of Rehabilitation Counselor Trainee. The minimum qualifications for the Rehabilitation Counselor Trainee position are a bachelor's degree from a regionally accredited college or university.

WVDRS strives to recruit graduates of accredited master's degree programs in rehabilitation like the one at WVU, but it does not require the Certified Rehabilitation Counselor (CRC) credential as the minimum qualification for a new counselor. Graduates of accredited master's degree programs in rehabilitation counseling are eligible for certification by the Commission on Rehabilitation Counselor Certification (CRCC), which sets the national standards for quality rehabilitation

counseling services in the U.S. WVDRS encourages the achievement of CRC by existing counselors and gives special preference to applicants with the CRC credential and qualified applicants with disabilities and from minority backgrounds. The WVDRS standard is specific to rehabilitation counselors only and is consistent with registration requirements of WVDOP, the WV state hiring authority

To ensure that counselors and other personnel remain up to date with evolving labor force needs and the needs of individuals with disabilities, WVDRS provides ongoing training opportunities for its field staff in group and individual settings. This occurs through educational activities such as the State training conference, periodic district-level training sessions, continuing education credit opportunities (Certified Rehabilitation Counselor), and training sessions by WVDRS Quality Assurance Specialists and WVDRS Employment Specialists. These activities allow WVDRS counselors and field staff to enhance their knowledge of labor force needs and ultimately better serve individuals with disabilities.

Individuals not meeting the above personnel standards for rehabilitation professionals are ineligible to interview for vacant rehabilitation counseling positions. Classification specifications for each position utilized by WVDRS are available through the WVDOP website:
<https://www.governmentjobs.com/careers/wv/classspecs>.

When employing new rehabilitation counselors, WVDRS makes no exceptions to its standard and provides the training necessary to meet requirements of the state standard only to existing personnel. These efforts are described later in this section.

Should qualified candidates be unavailable, the WVDRS Director, Assistant Directors, Human Resources Manager, and the Unit Manager or District Manager may reassess staffing/consumer needs and reassign qualified employees to assume duties of the vacant position. Qualified WVDRS retirees may also be rehired on a contractual/intermittent basis until permanent qualified employees can be hired.

The career ladder for advancement within the rehabilitation counseling ranks requires additional experience and credentials as well as increased responsibilities.

WVDRS Requirements for Qualified Rehabilitation Paraprofessionals

In order to more efficiently meet the needs of its consumers, WVDRS upgraded several clerical positions to paraprofessional status. A Rehabilitation Services Associate must be a high school (or equivalent) graduate and have at least four years of full-time or equivalent part-time paid experience in paraprofessional or responsible clerical office support work, which requires familiarity with casework procedures and delivery of direct consumer services in a state vocational rehabilitation services agency. A bachelor's degree from an accredited four-year college or university may be substituted for the required experience. The WVDOP specification for the Rehabilitation Services Associate position may be accessed at
<https://www.governmentjobs.com/careers/wv/classspecs>.

A Rehabilitation Services Associate assists qualified rehabilitation counselors in several ways: providing information about the rehabilitation process and services available to interested

applicants and members of the general public; obtaining information needed to complete the application process; initiating vocational diagnostic interviews; arranging medical, psychological, and vocational evaluations for WVDRS consumers; and assisting consumers in applying for student financial aid.

WVDRS employed 45 Rehabilitation Services Associates as of November 2025. These paraprofessionals are assigned to WVDRS offices throughout West Virginia. To ensure statewide coverage, at least one is located within each WVDRS district.

System of Staff Evaluation

WVDRS requires that each permanent employee receive an annual job performance evaluation. The work performance of employees is reviewed periodically as determined by the WV Division of Personnel. This evaluation system enables WVDRS to monitor the job performance of all staff members and identify areas of weakness and skill deficiencies that need training or remediation, as well as areas of strong performance. The evaluation also provides a systematic method of determining training needs for all staff members.

4. Method(s) the VR agency uses to ensure that personnel are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

West Virginia does not have large populations of ethnic groups who speak a language other than English. Consequently, WVDRS has not experienced difficulties making its programs accessible and available statewide. In rare instances where non-English language interpreters are needed, WVDRS has obtained those services from interpreters at the local level. An additional resource for non-English language interpreters is through the Job Accommodation Network (JAN) housed at West Virginia University. If needed, there are interpreters registered with the State of West Virginia who also offer interpreting services for languages other than English. In 2023, WVDRS added multiple options for virtual language and American Sign Language (ASL) interpreting services available anytime on demand.

The agency's main language accessibility needs concern people who are deaf, and each WVDRS district is staffed with a specialist counselor providing full access to programs and services for people who have deafness or hearing impairments. If needed, virtual interpreting services are available anytime on demand.

WVDRS continues to work with the West Virginia Commission for the Deaf and Hard of Hearing to train and certify interpreters to strengthen the network of providers for people who are deaf, hard of hearing, or deaf-blind. Numerous workshops and seminars are conducted to increase the number of interpreters, improve their communication skills, and provide better statewide coverage. These coordinated efforts will continue as needed.

WVDRS also ensures that its employees and consumers with blindness or visual impairments receive information and materials in their preferred mode of communication through various accommodations. Upon request, various WVDRS support units provide such services as assistive

communication devices, large print and/or Braille materials, audiotapes, and electronic (computer) copies.

5. As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

WVDRS will continue to coordinate its system of personnel development with the West Virginia Department of Education's (WVDE) personnel development under the Individuals with Disabilities Education Act/No Child Left Behind Act of 2001. This coordination will include collaborative efforts to share information, liaison activities, and cooperative training endeavors for WVDRS school counselors, teachers, and WVDE employees, particularly those assigned to the Office of Special Education.

The WVDRS state level liaison attends WVDE training functions related to special education and disseminates information about education policy or law changes to WVDRS school counselors as needed. WVDRS school counselors also receive information during their annual meeting. WVDRS school counselors also participate in cross-training efforts. In some areas of the state, WVDRS school counselors and managers participate in local interagency planning groups where training issues are discussed and planned.