



April 6, 2021

Ms. Carol Dobak  
Office of Special Education and Rehabilitation Services  
U.S. Department of Education  
400 Maryland Avenue SW  
Room 5153, Potomac Center Plaza  
Washington, DC 20202-5076

**Re: Docket ID ED-2021-OSERS-04 (Proposed Guidance; Frequently Asked Questions: Criterion for an Integrated Employment Location)**

Dear Ms. Dobak,

The American Network of Community Options and Resources (ANCOR) is writing to express that we support the comments submitted by the Employment and training Task Force of the Consortium for Citizens with Disabilities, of which we are a member, on the proposed changes to the “Frequently Asked Questions – Criterion for an Integrated Employment Location in the Definition of ‘Competitive Integrated Employment’ and Participant Choice.”

ANCOR is a national trade association for disability service providers, representing over 1,600 private providers of disability community services for people with intellectual and developmental disabilities (I/DD) and 56 state provider associations. Collectively, ANCOR members support over one million individuals with disabilities. ANCOR’s mission is to advance the ability of our members in supporting people with I/DD to fully participate in their communities. ANCOR has historically supported the position that people with disabilities thrive in the community and supports and services should be funded to secure the best outcomes.

In addition to those comments, we also have concern that the criteria of “opportunities for advancement” could significantly limit an individual’s participation in the program. While we want to see people paid fairly in their chosen career, and we want to ensure that individuals with intellectual and developmental disabilities have the opportunity to work alongside their non-disabled colleagues in meaningful and productive ways, we are concerned that someone’s selected job may not have a clear path to advancement and/or that an individual could take a job without wanting to pursue advancement. To require “opportunities for advancement” as a criterion for competitive integrated employment will surely limit the number of people who will be able to access VR for support on their path to employment.

We appreciate the opportunity to provide comment on the proposed resource and believe that once the CCD comments are incorporated, it will help VR counselors, job seekers, and support organizations understand the guidelines and expectations associated with participation in the Vocational Rehabilitation program.

Sincerely,

A handwritten signature in black ink that reads "Shannon McCracken".

Shannon McCracken  
Vice President for Government Relations