



Commission for Case Manager Certification

November 6, 2019

To Whom It May Concern:

We are writing on behalf of the Commission for Case Manager Certification which oversees the process of certification for the Certified Disability Management Specialist (CDMS). We are recently in receipt of information regarding the proposed criteria for Vocational Expert Consulting Services from the Social Security Administration. Per the proposed criteria:

4.1 Qualifications to Provide Service as a VE

VEs must be individuals with the ability to provide impartial expert opinions relevant to the evidence contained in the claim file, other evidence provided by OHO, and testimony provided at an ALJ hearing. Areas of expertise must include current knowledge of working conditions and physical and mental demands of various occupations; transferability of skills; knowledge of the existence and numbers of jobs at all exertional levels in the national economy; and involvement in or knowledge of placing individuals with disabilities into jobs.

To ensure all individuals serving as a VE have the knowledge, skills and ability to provide expert opinions, all VEs must meet and maintain all of the following requirements:

- 1. At least five years of direct experience providing vocational rehabilitation services to individuals with disabilities,*
- 2. Current national certification as either a Certified Rehabilitation Counselor (CRC) by the Commission on Rehabilitation Counselor Certification (CRCC), or National certification as a Fellow or Diplomate by the American Board of Vocational Experts (ABVE), and*
- 3. Meet the continuing educational requirements of their national certifications from either the CRCC or ABVE.*

The Commission for Case Manager Certification oversees the Certified Disability Management Specialist (CDMS) credential. The credential has been in existence since 1984 and is obtained by meeting specific experience criteria as well as passing a research-based examination. The rigor of the examination is supported by the Role & Function study (job task analysis) that is conducted every five (5) years to gather specifics about the knowledge, skills and activities of currently practicing disability management specialists. This data is then utilized to inform the exam assuring currency and relevancy in the practice of the CDMS.

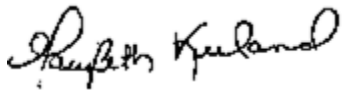
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Recognizing that the individual's ability to provide impartial expert opinions requires knowledge and experience in this field, the Commission would like to put forward that there are persons certified as Disability Management Specialists that would meet these criteria though their certification may not be in line with requirement #2. It is the opinion and recommendation of the Commission that the expertise of the individual, along with professional certification, be the priority in recognizing a vocational expert. We believe that other certifications such as the CDMS could be considered, for professionals with appropriate experience as vocational experts, in addition to those of the CRCC and ABVE.

Thank you in advance for consideration of this response. The Commission is happy to provide additional information to support this recommendation as requested.

Very truly yours,

A handwritten signature in cursive script that reads "MaryBeth Kurland".

MaryBeth Kurland, CAE

CEO

Commission for Case Manager Certification