

From: [Sunset Advisory Commission](#)
To: [Cecelia Hartley](#)
Subject: FW: Comments on the DARS Staff Report
Date: Friday, June 06, 2014 3:58:09 PM
Attachments: [AFB Specialized Services Overview.pdf](#)
[AFB Specialized Services Aging.pdf](#)
[AFB Specialized Services Employment.pdf](#)

From: Neva Fairchild [mailto:nfairchild@afb.net]
Sent: Friday, June 06, 2014 3:57 PM
To: Sunset Advisory Commission
Subject: Comments on the DARS Staff Report

To: Sunset Commission

From: American Foundation for the Blind Center on Vision Loss

Date: June 6, 2014

The Sunset Commission Staff report on DARS released in May 2014 includes two issues which we very strongly oppose.

Issue 1 Sunset recommendation - The Separation between DARS' Divisions for Blind Services and Rehabilitation Services Causes Unnecessary Duplication and Impedes Access to Service.

We know you are aware of how critically important specialized services, such as: vision rehabilitation teaching, orientation and mobility training, braille training, employer relationship development, and access technology training are to the successful rehabilitation of people who are blind or visually impaired. For specialized services to be truly effective, administration and management must have a clear understanding and be strongly supportive of the rehabilitation needs so critical for employment and independent living for Texans with vision loss.

This recommendation to merge the Division for Blind Services administration and management with the Division for Rehabilitation Services will weaken specialized services.

- Although blindness is a low incidence disability, there is a need for extensive and ongoing specific training to provide specific rehabilitation services that will match this population's needs. Managers need to be able to supervise the quality of the services and monitor that they reflect best practice. It is important to have leadership and administrative support from people who are informed and trained on the needs of people who are blind or visually impaired.
- Individuals with vision loss often require more comprehensive rehabilitation services to generate a successful employment outcome. Blind consumers might be overlooked in favor of less intensive non-blindness related cases if their services are merged into a more generic vocational rehabilitation system. There will be an incentive to get faster results to meet rehabilitation goals by serving those without longer term specialized training needs, such as orientation and mobility and instruction in access technology.
- There is current data to support separate structures: The primary conclusions of Mississippi State University 2010 research on the outcomes of separate blindness-specific versus combined agencies is highlighted below:

Consumer Outcomes - "....Separate agencies, compared with General/Combined agencies, close a higher percentage of consumers in employment in integrated settings and in self-employment."

Competitive Employment- "....Separate agencies, compared with General/Combined agencies, close a higher percentage of consumers in competitive employment..."

- Attitudes towards blindness and adjustment to blindness by consumers dramatically influence the need for

specialized services from rehabilitation professionals with in-depth knowledge and skills in blindness related issues. Distinctive needs of the population with vision loss will get overlooked in a larger administrative structure meeting more generalized needs.

- Often, specialized services are more costly and take longer because of the in-depth training required. We are concerned that management may not understand the importance and necessity of sufficient time and resources to achieve a successful rehabilitation outcome.

Issue 3 Sunset recommendation- DARS Offers Many Independent Living Services Consumers Could Easily Access Through Local Centers for Independent Living.

This recommendation might work for DRS consumers, but it **WILL NOT** work for the older individuals who are blind served by the Division for Blind Services. The services offered by the ILC, such as: advocacy, philosophy of independent living and financial management do not even begin to scratch the surface of the services needed by older individuals who are blind. They need to be taught by specially trained professionals the skills they need to live safely in their own home, performing tasks such as cooking, identifying and managing medication; reading mail with access technology; identifying clothing and money; traveling safely and communicating with others through the use of technology. Currently these services are provided in the individual's home because they don't have the ability to travel independently to a facility. We are not aware of any ILC in the state of Texas that is equipped to meet the needs of the older blind population. There is a specific federal funding stream to serve older individuals who are blind through designated state units which should stay with the Division for Blind Services.

- The number of seniors who are visually impaired is growing exponentially and services need to expand, not become more limited.
- Specific assistance to function with vision loss is critical for the increasing number of seniors who lose vision as they age.
- The Texas Silver Haired Legislature called for expanding funding and staffing for the older blind program as one of their top priorities.
- The need is growing - as of April, DBS exceeded the number of people served through the whole of last year already - their numbers are up by 25%.
- There aren't readily available independent living centers locally in all parts of the state. Their catchment areas are enormous and transportation to these centers is a real barrier.
 - There is limited expertise available at the centers to assist people who are blind or visually impaired.
 - There is a need for specialized assistance in the home (not at a center) for many newly blinded Texans who need training in independent living skills and orientation and mobility to remain safely at home.
 - Services for older blind people are even more critical because Medicare does not generally cover vision rehabilitation services.

Sincerely,



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The American Foundation for the Blind (AFB) is a national nonprofit that expands possibilities for people with vision loss. AFB's priorities include broadening access to technology; elevating the quality of information and tools for the professionals who serve people with vision loss; and promoting independent and healthy living for people with vision loss by providing them and their families with relevant and timely resources. AFB is also proud to house the Helen Keller Archives and honor the more than forty years that Helen Keller worked tirelessly with AFB. For more information visit us online at www.afb.org/cvl.