



**Rehabilitation Council of Texas**  
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Austin, Texas 78756  
(512) 424-4160

November 13, 2014

Sunset Advisory Commission  
PO Box 13066  
Austin, Texas 78711

Dear Commission Members:

On behalf of the Rehabilitation Council of Texas (RCT), we would like to extend our thanks for the detailed and comprehensive work of the Sunset Advisory Commission. The Rehabilitation Council of Texas is a federally mandated, governor-appointed advisory council for the state vocational rehabilitation services programs funded under Section 110 of the Rehabilitation Act of 1973, as amended, and included in Title IV of the Workforce Innovation and Opportunity Act of 2014.

We appreciate the opportunity to express our concern regarding Recommendation 1.1 of the Sunset Commission's Report on the Health and Human Services Commission, issued October 2014. Recommendation 1.1 proposes consolidating the five HHS agencies into one agency. The concern of the RCT relates to vocational rehabilitation eligible Texans with disabilities who are currently being served and those who may seek services in the future through the two state vocational rehabilitation programs. The two programs are the Division of Blind Services and the Division of Rehabilitation Services, and are housed within the Department of Assistive and Rehabilitative Services (DARS).

The RCT opposes recommendation 1.1. This recommendation would create a large, complex organizational structure that would make access to vocational rehabilitation services difficult. As the recommended structure combines vocational rehabilitation with medical and social services, we have serious concerns that Texans with disabilities would be confused as to the vocational nature of the services provided, and that the pivotal employment aspect of vocational rehabilitation services would be diluted.

We have further concerns that the recommended placement of the two vocational rehabilitation programs, funded under Section 110 of the Rehabilitation Act of 1973, as amended, would provide the necessary programmatic and budgetary control to ensure that quality and timely services could be provided to vocational rehabilitation

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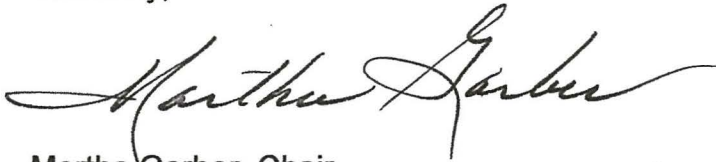
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eligible individuals with disabilities. For instance, the procurement and timely delivery of assistive technology needed for successful employment.

We encourage the Commission to further review the federal legislation for the organizational structure requirement for the vocational rehabilitation programs, funded under Section 110 of the Rehabilitation Act of 1973, as amended, to ensure that the structure recommended by the Sunset Commission staff report does not jeopardize Texas's eligibility to receive federal funds for these vocational rehabilitation programs.

Thank you for considering our comments.

Sincerely,

A handwritten signature in cursive script, reading "Martha Garber". The signature is written in dark ink and is positioned above the printed name.

Martha Garber, Chair  
Rehabilitation Council of Texas