

From: [Sunset Advisory Commission](#)
To: [Cecelia Hartley](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
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From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
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Agency: DEPARTMENT ASSISTIVE AND REHABILITATIVE SERVICES DARS

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Your Comments About the Staff Report, Including Recommendations Supported or
Opposed:

I thank you for the immense work you put into researching these recommendations. I understand this is an enormous undertaking and I appreciate your time and your dedication to ensuring services maintain integrity and efficiency for Texans.

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

I disagree with this recommendation and urge that Division for Blind services remain separate and distinct from Department of Rehabilitation Services. My personal and professional experience is that specialized blind services require trained management and leadership to ensure the continuation of the seamless and specialized service delivery system necessary for blind individuals in Texas to learn the alternative techniques needed to achieve a quality employment outcome.

I am a product of the blind children's program, and the transition program. I took advantage of specialized training in high school summers as well as an adult training program before college. I am positive these programs and services were key in my academic success and eventual employment.

Blindness is a low incidence disability but it requires in-depth understanding to administer appropriate training. A one-size fits all rehabilitation model will not work.

Rehabilitation training for those without vision loss is often less costly; there will be an incentive to get faster results

to meet rehabilitation goals by serving those without longer term specialized training such as orientation and mobility and instruction in assistive technology. There is a danger Blind consumers could be overlooked in favor of less intensive non-blindness related cases if services are merged into a more generic vocational rehabilitation system.

There is consistent and substantial 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.

Next, DRS has never had a children's program; the Blind Children's Program would lose the leadership and oversight of knowledgeable supervisors who meaningfully direct these critical support functions for families and young children.

The Blind Children's Vocational Discovery & Development Program prepares blind and significantly visually impaired children for the Vocational Rehabilitation Program, while also helping parents teach their children to become responsible and independent adults. Without these services, DRS will have to expend additional resources to prepare these consumers for employment. Some will be so far behind, employment will not be attainable and they will be dependent on government programs.

Next concern:

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

Again I strongly oppose this recommendation and structural shift in service delivery. The number of seniors experiencing vision loss is growing overwhelmingly and services need to be expanding, not decreasing. Specific assistance to function with visual loss is critical for the increasing number of seniors who lose vision as they age. The Texas Silver Haired Legislature advocated for expanding funding and staffing for the older blind program as a top priority.

Independent living centers are not available locally in all parts of the state. Transportation to these centers is a legitimate barrier.

Expertise at the centers to assist people who are blind or visually impaired is nonexistent to very limited.

There is a specific 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 at home safely with independence.

The funds that are now earmarked for blindness related services will be dispersed within the larger general community and services will suffer.

Conclusion: Consolidation of departments for the blind and blindness services in other states has not resulted in cost-saving, and the quality of services has consistently diminished. James H. Omvig, author and consultant on issues concerning blindness and a current board member of the National Blindness Professional Certification Board, articulates the issue as follows:

"There is, indeed, a need for coordination and integration of state services for the blind, but terminology should not be confused with reality. If, for instance, a state has a supervisor of highway construction, a supervisor of elementary education, a supervisor of pest control, and a supervisor of health and welfare, it does not follow that integration and coordination are achieved by creating a Department of Supervisors and lumping all of these people

and functions together. Nor is any real integration or coordination achieved by establishing a Department of Health and Highways. Health is one function, highways another, and they cannot be meaningfully integrated. If such a department is established, all that can be accomplished is to superimpose a costly administrative hierarchy upon the two departments. They will still remain separate functions whether they be called departments, divisions, sections, bureaus, or whatever. In fact, the administrative hierarchy will be detrimental and will only cause inefficiency and waste in such a situation.

Relating all of this to the blind, fragmentation is increased rather than helped by putting all of the services for the blind into a division of a super-department. What is needed is common sense rather than textbook theory and neatness of somebody's organizational chart. Sound reasoning tells us that the various services for the blind complement and supplement one another and form one unique entity. They are only very slightly and incidentally related to services for people with other disabilities or other disadvantaged groups despite the similarity of terminology."

Finally, several years ago an independent study (The Mallas Report) was made of service delivery systems to determine which type was best suited to provide quality rehabilitation and related services for the blind. The study concluded that the separate, independent agency with a lay board appointed by the governor is best. In an interview the researcher said, "Where reorganization of services for the blind has taken place on the basis of the economy-of-scale principle, its proponents have sold the legislature and the Governor on statements such as, 'This will be more efficient and economical.

It will let us get more mileage out of every tax dollar.' As a matter of fact, in every state where such reorganization has taken place, the prestige and level of operation of the agencies serving the blind have been downgraded." This study also makes another revealing finding. "In general programs for the blind which fall under rehabilitation departments and umbrella agencies have the least effectiveness in developing and utilizing necessary financial resources."

The decline of effective programs and services will result in lower employment, and prolonged dependence on public assistance: everyone will lose.

Please reconsider and reverse recommendations 1 and 3. The success, equality, and opportunity of blind Texans depends on it.

Any Alternative or New Recommendations on This Agency: Remove Recommendations 1 and 3. Keep the Division for Blind Services a separate agency and all management and leadership functions and services operationalized through that agency.

My Comment Will Be Made Public: I agree