

From: [Sunset Advisory Commission](#)
To: [Cecelia Hartley](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, June 06, 2014 8:13:26 AM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 06, 2014 4:47 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 6, 2014 - 04:47

Agency: DEPARTMENT ASSISTIVE AND REHABILITATIVE SERVICES DARS

First Name: Louis

Last Name: Maher

Title: Mr.

Organization you are affiliated with: The National Federation of the Blind of Texas

Email:

City: Houston

State: Texas

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

Dear Senator Nelson;

I am Louis Maher, secretary of the National Federation of the Blind of Texas (<http://www.nfbtx.org>). I wish to comment on the Sunset Commission's staff report on the Department of Assistive and Rehabilitative Services (DARS). I oppose the first and third recommendations in this report.

Recommendation One

Currently DARS has 2 designated units: the Division for Rehabilitation Services (DRS) vocational rehabilitation, and the Division for Blind Services (DBS). Recommendation one is to administratively merge these divisions.

The reasons why I disapprove of this recommendation are:

1. 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.
2. The training department at a large agency has to focus on training staff with varied job descriptions and duties. Currently, the Division for Blind Services (DBS) staff responsible for providing training focus solely on training DBS staff on the complex issues related to blindness. These staff are trained to be experts in the blindness field which takes significant time and knowledge.

3. 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. 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.
4. The purchasing department at the large agency will have no concept of the nuances related to purchasing services for consumers; the DARS purchasers understand consumers' needs and the importance of obtaining services quickly and efficiently.
5. There is current data to support separate structures (Cavanaugh, 2010):
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..."*
6. DRS has never had a children's program; the Blind Children's Program would lose the leadership and oversight of knowledgeable supervisors who can meaningfully direct these critical support functions for families and young children and for transition services.

Recommendation Three

Recommendation three is that DARS Offers Many Independent Living Services Consumers Could Easily Access Through Local Centers for Independent Living.

This recommendation would change the current system, where DARS directly provides many independent living services (ILS) in consumer homes, to a system where all state independent living services would be provided by or through centers for independent living in all areas of the state, except where no center is willing or able to provide services.

The reasons why I disapprove of this recommendation are:

1. The number of seniors who are visually impaired is growing exponentially and services need to expand, not become more limited.
2. 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 called for expanding funding and staffing for the older blind program as one of their top priorities. The need has grown - as of April, DBS exceeded the number of people served through the whole year already - their numbers are up by 25%.
3. 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.
4. There is limited expertise available at the centers to assist people who are blind or visually impaired.
5. 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.

Summary

If recommendations one and three of the report are followed, the funds that are now earmarked for blindness related services will be dispersed within the larger general community and services will suffer.

Reference

Cavanaugh, B. S. (2010). An update on services and outcomes of blind consumers served in separate and general/combined VR agencies. Prepared for the National Council of State Agencies for the Blind by the Rehabilitation Research and Training Center on Blindness and Low Vision, Mississippi State University. Mississippi State, MS: RRTC-MSU.
([http://www.blind.msstate.edu/research/nrtc-publications/download/questionnaire.php?id=187&f=An Update on Services and Outcomes of Blind and Visually Impaired Consumers Served in Separate and General/Combined VR Agencies&itk=bc7e6022c141e1b6096ab05d618d5f5b](http://www.blind.msstate.edu/research/nrtc-publications/download/questionnaire.php?id=187&f=An%20Update%20on%20Services%20and%20Outcomes%20of%20Blind%20and%20Visually%20Impaired%20Consumers%20Served%20in%20Separate%20and%20General/Combined%20VR%20Agencies&itk=bc7e6022c141e1b6096ab05d618d5f5b)).

Submitted by
Louis Maher

Any Alternative or New Recommendations on This Agency: Please leave the two DARS divisions (DRS and DBS) as separate administrative entities.

My Comment Will Be Made Public: I agree