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**Comments to the 2014 Sunset Advisory Commission  
Regarding the Division of Assistive & Rehabilitative Services (DARS)**

These comments are intended to address the Sunset Advisory Commission Staff Report on the Division of Assistive & Rehabilitative Services. I stand in opposition to recommendations 1 and 3 in the staff report.

**Recommendation 1**

The first recommendation in the staff report suggests that blind Texans would be better served by rolling all rehabilitation services into a single agency. I oppose this shift in policy for the following reasons:

- Labor statistics often cite studies that show unemployment among working-aged blind people hovering at or near 70%; however research conducted by the Rehabilitation Research Center on Blindness and Low Vision, at Mississippi State University, demonstrates that blind people who receive service from a separate agency for the blind have better employment outcomes than those who receive service from an agency serving all disabilities. That means more legally blind people find competitive employment, and we earn more money. While it is true that people with less severe visual impairments benefit equally from either a separate or combined agency, it is also true that people who are legally blind or who have additional disabilities are more likely to become competitively employed if they receive services from an agency established to serve the unique and specific needs of the blind.
- Separate agencies for the blind typically hire staff members who are exceptionally qualified to meet the needs of blind consumers. While it is simple for a combined agency to offer visually impaired consumers a pair of glasses or a piece of equipment designed to enlarge print and send them back to the workforce, it is more difficult to plan rehabilitation services that include training in the use of nonvisual techniques. These include cane travel, Braille, daily living skills (examples: cooking, cleaning, doing laundry, shopping, clothing selection and labeling, etc.), access technology training, and more. Therefore, combined agencies tend to provide more service, and close more cases, for those who are visually impaired versus those who are legally blind.

- People who are blind want to work. We do not want to sit at home and collect public assistance; however, if we cannot access quality, training programs many of us will be forced to do exactly that. Combining management, and essentially abolishing the Division of Blind Services will cost blind people employment opportunities. Why? Bureaucrats in a large, general agency will not understand the complexities of the rehabilitation process that is necessary for a legally blind consumer. There will be a giant learning curve for managers unaccustomed to acquiring adjustment to blindness training, access technology, and education resources for blind consumers. It will take years to master the intricacies of serving blind people, and research demonstrates that general agencies simply don't provide blind people with the services necessary to ensure positive, competitive employment outcomes.

Rather than dismantling the Division of Blind Services, I would recommend that the Commission establish a means by which advocates and consumers can offer real input regarding service delivery by DBS. I am aware that advisory councils already exist; however, blind Texans need to have the power to change policy or call agency staff to account when problems arise. Establishment of a policy making and advocacy board specifically for DBS would create a new opportunity for citizens to question decisions made by bureaucrats, and establish a mechanism for including successful, blind adults in the power structure of this agency.

The National Federation of the Blind works tirelessly to promote employment as an outcome for blind people who participate in the rehabilitation system. We believe in work, and unlike many other blind people, most of our members have jobs. To demonstrate this point, let me cite a recent study regarding employment outcomes for blind adults. Dr. Edward C. Bell, of the Professional Development & Research Institute on Blindness, at Louisiana Tech University, studied 1,056 blind and visually impaired people from across the U. S. regarding employment. His study concluded that blind and visually impaired people who receive training from a Structured Discovery training center (also known in the blindness field as NFB centers); use a long, white cane on a daily basis; read Braille daily or weekly, and participate actively in the National Federation of the blind have a 75% employment rate, with average annualized earnings of \$53,600.00 per person.

Texas does not operate a Structured Discovery training center, and there are problems to address regarding the operation of the Division of Blind Services, but I urge the Sunset Commission to stop the erosion of service to blind Texans so that we can work together to reach the ideal set out in Dr. Bell's study.

### **Recommendation 3**

The third recommendation in the staff report, advises that DARS utilize CILs to provide more independent living services. Presumably, this would include spending the IL dollars allotted through the Older Blind Program with CILs. While Centers for Independent Living provide excellent services to people with disabilities, they have

not traditionally provided training in nonvisual techniques for blind seniors. Therefore, I oppose the staff recommendation, as it applies to Texas' senior blind population, for the following reasons:

- People who lose their sight as they age are the predominant recipients of IL services in the blind community. We in the National Federation of the Blind believe that these seniors can learn to function effectively with training in the use of nonvisual techniques. The Division of Blind Services (DBS) currently provides these services to blind seniors through a network of rehabilitation teachers who travel to the consumer's home. This has been effective because most seniors aren't seeking employment, so their primary need is to learn how to travel independently in their communities and to perform daily living tasks. They are, however, often afraid to travel outside their homes prior to receiving this training, and the availability of these traveling teachers solves that problem. Centers for Independent Living have not traditionally provided these services, and most do not have the requisite staff to carry out adjustment to blindness training.
- I represent blind Texans who live in rural areas, and CILs are not usually housed in rural communities. That makes them inaccessible to a substantial population of blind seniors.
- Funds for the Older Blind Program, which allows the senior blind population access to independent living services are extremely limited, and dividing them among 27 CILs would diminish the return on investment for this program.
- Centers for Independent Living have a great track record of service to people with other disabilities, but few have extensive experience providing adjustment to blindness training. While DBS has cane travel instructors who can provide blind seniors with the skills necessary to navigate their neighborhoods and communities, CILs do not. While DBS can provide a teacher to train older blind people to cook without vision, CILs cannot. While, DBS has staff that can assist older blind Texans who want to remain independent in their homes, CILs do not currently have the resources to help them achieve the same level of independence.

In short, DBS currently has the infrastructure necessary to help Texas' older blind population remain independent, contributing members of society. Centers for Independent Living generally do not have that capability, and our parents and grandparents simply don't have time to wait until they are able to develop the requisite skill set to provide them with the services they need to live out their final years as active members of their families, churches, and communities.

For these reasons, I urge the Commission to leave funding for independent living services for blind seniors under the auspices of the Division of Blind Services.