

**From:** [Sunset Advisory Commission](#)  
**To:** [Cecelia Hartley](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Tuesday, June 03, 2014 4:54:13 PM

---

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

From: [sundrupal@capitol.local](mailto:sundrupal@capitol.local) [<mailto:sundrupal@capitol.local>]  
Sent: Tuesday, June 03, 2014 2:01 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Tuesday, June 3, 2014 - 14:00

Agency: DEPARTMENT ASSISTIVE AND REHABILITATIVE SERVICES DARS

First Name: Paul

Last Name: Hunt

Title:

Organization you are affiliated with: Austin Council of the Blind

Email:

City: Austin

State: Texas

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

Recommendation 1.1 The staff recommends that the Texas Legislature change the statute to Require DARS to integrate administration, management, and oversight of the divisions for blind services and rehabilitation services to eliminate duplication and better serve consumers. DARS would organize its services by functional need rather than the type of disability. For Blind and Visually Impaired people, functional needs would include the ability to travel independently, access information, use proper social skills and maintain a home independently. Many of these skills are intuitive for people with vision but have to be taught to people who are Blind or Visually Impaired. Functional Assessments would have to be done. This approach would provide the agency flexibility in working with people who have multiple disabilities and would enable counselors to be very flexible when developing rehabilitation plans. There are risks, however. If functional assesments are done by people who are not familiar with what Blind and Visually Impaired people need, the consumers will not get the proper rehabilitation services. To mitigate this risk, the legislature should direct DARS to implement controls to insure that the people doing functional assessments are properly qualified.

Although the number of counselor positions would not be decreased under this recommendation, it sounds like counselors could have a case load consisting of people with various disabilities. The risk is that counselors that are part of DVS are not familiar with the type of rehabilitation that Blind and Visually Impaired people need. To mitigate this risk, the legislature should direct DARS to train all of its counselors in the rehabilitation needs of Blind and Visually Impaired people.

Align regions and consolidate field offices I like the idea of consolidating offices to save money. the risk is that since Blind and Visually Impaired people normally do not drive, they may lose access to their nearest DVS office. To mitigate this risk, counselors and other service providers should continue to do field visits.

Specialize in different disabilities

DARS could ensure continuity of expertise and services by allowing its current vocational rehabilitation counselors

from the Division for Blind Services to continue to serve consumers who are blind or visually impaired. I like this recommendation. The medical profession uses this model all of the time. The Family Practice doctor or the Internist refers patients to specialists. I can see cases where several counselors work with a particular consumer. Perhaps these people would have a primary counselor like the primary care physician and other counselors who specialize in specific disabilities.

Consolidate planning, reporting, and policies I support this recommendation.

Update agency rules

The intent of the Sunset Commission Staff seems to be the integration of the management structures but to keep the services as they are now. To make this happen, an agency culture needs to be developed that encourages open communication and sharing. The culture should also value all of the employees and their specialties.

Recommendation 1.2 DARS should develop a transition plan for the integration of the administration, management, and oversight of the divisions for blind services and rehabilitation services, no later than March 1, 2016 A short-term timetable with specific steps and deadlines for the easier-to-integrate elements, such as consolidating policies, reporting, and staff, preserving expertise in serving consumers who are blind or visually impaired, and requesting designation as a combined state unit.

As the agency moves forward with these plans, it is imperative that it works with its advisory committees, the National Federation of the Blind and the American Council of the Blind. It is imperative that the agency preserve expertise in serving consumers who are blind or visually impaired.

Recommendation 1.3 Direct DARS to take immediate steps to insure access to services for people with multiple disabilities, no matter which division offers the services.

I like this recommendation because it would allow people with multiple disabilities to get concurrent services at the same time. This could be critical for persons when getting an education or applying for a job.

Fiscal Implications

The Sunset Commission staff recommends the elimination of twenty-one management positions. This would allow the agency to hire thirty-one new rehabilitation counselors, which would reduce their case loads. I like this recommendation.

Recommendation 2.1 Require DARS to create clear, validated guidelines for case workers to ensure better decision making for successful, cost effective outcomes.

I like this recommendation because it requires DARS to measure progress in cases and to measure case outcomes. This is important because DARS resources are limited.

Require the agency to create a robust and consistent case review system for direct services programs.

I support this recommendation because counselors and managers will get the guidance they need to ensure that cases are properly monitored.

Recommendation 2.3 Require DARS to designate staff to monitor performance across programs and regions.

I support this recommendation.

Recommendation 3.1 Define DARS' role in the provision of independent living services as supporting and monitoring the network of centers for independent living.

The Sunset Commission staff is recommending that all independent living services be provided by Centers for Independent Living. This sounds like a good idea. However, it will only work if DARS can implement controls to ensure that Blind and Visually Impaired people are fully integrated. I will be looking at the DARS response to this recommendation.

Recommendation 3.2 DARS should evaluate independent living services available in communities throughout the state.

This recommendation will provide a benchmark for further evaluation of the Centers for Independent Living.

Recommendation 4.1 Require DARS to build and maintain close coordination with the Texas Workforce System and employers to increase job opportunities for people with disabilities.

I support this recommendation.

Recommendation 4.2 Require DARS to partner with the Texas Education Agency to develop a mechanism To target schools with the highest need for transition services, and to develop policies to insure it provides consistent, minimum level of service.

I support this recommendation.

Recommendation 4.3 Direct DARS to consolidate its Employer Relations staff and give them responsibility over workforce system coordination and employer initiatives.

I support this recommendation.

Direct DARS to develop a strategy for assisting federal contractors to hire individuals with disabilities, and to task its Employer Relations staff with researching and anticipating similar federal or state initiatives in the future.

I support this recommendation.

Recommendation 5.1 Direct DARS to develop mechanisms to more effectively plan for, track, and evaluate the performance of its programs and staff.

I support this recommendation.

Recommendation 6.1 While DARS' services remain needed, delay decisions on the agency's structure until completion of the Sunset review of the Health and Human Services system overall.

I support this recommendation.

Any Alternative or New Recommendations on This Agency: I don't have any additional recommendations.

My Comment Will Be Made Public: I agree