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Kylee Hope, Director
Bureau of Rehabilitation Services
Division of Disability and Rehabilitative Services
Indiana Family & Social Services Administration
402 West Washington Street, W453
Indianapolis, IN 46207-7083

Dear Kylee:

Thank you for the opportunity to comment on the draft State Plan for Vocational Rehabilitation Services (VRS). INARF applauds the state agency for the importance it places upon obtaining public input from a wide range of stakeholders in developing the State Plan, and is confident that the feedback received will be carefully considered in the final development of the plan. Please know that beyond our written comments, INARF is dedicated to assisting the state agency in any way appropriate to improve VR systems and services to individuals with disabilities.

INARF is the principal statewide trade association representing agencies that serve Hoosiers with intellectual and developmental disabilities. INARF Members often play a lifelong role in the lives of those they serve by providing a continuum of services that in many instances stretches from birth to death and across all facets of life in their chosen community. Further, INARF and its members are committed to ensuring Indiana's system of services and supports for individuals with intellectual and developmental disabilities offers maximum options, access, and choice. To that end, we appreciate the opportunity to provide our feedback on the draft State Plan. INARF has also encouraged its member agencies to submit comments in response to your request. We appreciate in advance your thorough review and consideration of their feedback.

Overall, we are encouraged by the Plan's emphasis on quality outcomes and objective, measurable results. The proposed changes to the Vocational Rehabilitation Services staffing structure also appears to better match programmatic needs. In order to ensure that the State's goals are met, it is critical that adequate funding is available for existing services as well as innovative projects. With this in mind, INARF encourages the Family and Social Services Administration to make every effort to assure all available federal funding sources are matched. Additionally, INARF strongly recommends the adoption of the service and reimbursement models under development by the Vocational Rehabilitation Rate Reform Work Group. This model, when complete, will better align the funding approach with the outcomes proposed in the Plan.

In addition to these general observations, INARF offers comments on a few key areas that must be addressed to ensure seamless service coordination and collaboration, including school to work transition, internships, and Supported Employment Follow-Along (SEFA). Specifically, INARF recommends the following:

TRANSITION: INARF endorses the proposed shift in VRS staff and resources to transition-aged individuals with disabilities. Past experience has shown that having an active presence in high schools greatly improves outcomes for transitioning students. While having VRS staff in the schools is a step in the right direction, INARF recommends partnering with Community Rehabilitation Programs to provide direct services to students, including internships, job development, and individualized training. We suggest that the pilot programs currently being operated through a grant obtained by the Indiana Institute on Disability and Community (IIDC) represent an excellent model to consider state-wide.

INTERNSHIPS: INARF was pleased to note that internships are being evaluated as part of the menu of available service options. Internships are a valuable tool in securing valued employment opportunities, especially for transition-aged youth and those individuals with no or limited job history. As important as the work experience is in itself, there is also great value in learning the tangible benefits of work. For this reason, INARF strongly recommends that reimbursement for intern services cover the cost of service provision, as well as payment to the individual for the work performed.

SUPPORTED EMPLOYMENT FOLLOW ALONG (SEFA): For many individuals placed into competitive employment, follow-along services play a critical role in ensuring a successful long-term employment outcome. Individuals with the most significant disabilities can be stable in a job, while still requiring regular, on-going support – sometimes for the duration of employment. Although there has been increased coordination between the Bureau of Rehabilitation Services (BRS) and the Bureau of Developmental Disability Services (BDDS), the eligibility determination process remains a barrier to a smooth transition into SEFA services. It is recommended that BRS work diligently with BDDS to revise the eligibility and transition process to better accommodate individuals served by both bureaus.

Thank you very much for your consideration of our comments on the State Plan and the Vocational Rehabilitation Program. We hope you find that they are constructive and will assist you in planning and implementing a quality and coordinated program for Hoosiers with disabilities.

Sincerely,



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President/CEO



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Director, Research & Program
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cc: Nicole Norvell, Director, Division of Disability and Rehabilitative Services