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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 Proposed Hybrid Model under consideration 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 model, and is confident that comments will be carefully considered in the final development of the approach. INARF has greatly appreciated the opportunity to work with you and your staff on this important effort. Please know that beyond our written comments, we remain dedicated to assisting the state agency in any way appropriate as you consider modifications and implementation.

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 proposal.

Overall, we believe the proposed Hybrid Model represents an important step toward improving access and outcomes for Hoosiers with the most significant disabilities. As described, the model encourages an individualized approach to designing services and supports that are consistent with the individual's unique employment related needs and circumstances. Further, we appreciate the Model's emphasis of using an Employment Specialist throughout all phases of the employment process and engaging various specialty providers to work with the individual and their employment specialist as indicated by their expressed needs.

To maximize the model's opportunity for success, we recommend that policies and procedures must emphasize and support local decision-making. More specifically, we believe the Bureau should establish decision-making trees and similar supports that provide "trigger" points for the team to engage in critical discussions about the need and use of various supports. These decision-making supports should be supplemented with materials that provide suggestions for services and supports based on various characteristics and employment related

needs. We believe these supports encourage individualized service design through a consistent approach to the planning process.

In addition, we recommend that the Bureau design and implement processes to monitor system performance to ensure that the overall system experience is consistent with the model's underlying purpose and values. We believe this is critical for three key reasons. First, it establishes and communicates expectations to all stakeholders about the anticipated service experience for VR consumers. Second, it provides a systemic approach to monitoring the service delivery system so that support and correction (if needed) can be targeted to specific issues and/or areas. Third, a systemic approach promotes the development of positive team relationships as performance issues are addressed without significant reliance on stakeholders having to raise concerns on an individual basis.

Relative to the proposed rates, we believe the proposed milestone payments are sufficient for addressing these elements of the process. In particular, we appreciate the Bureau's recognition of the increased investment of time and resources needed early in the process. As to the hourly service rate, we appreciate the Bureau's efforts to restore the rate to its pre-2010 level and beyond. This is helpful, however concerns remain as to whether and to what extent the rate sufficiently covers the costs to recruit, train, and retain quality employment services staff. Additionally, we recommend that the Bureau consider adding a flat rate for internships that includes resources to provide a stipend to the individual. Internships are an important tool for discovery and for creating long-term job opportunities. The work performed through these activities should be compensated to encourage their use, when appropriate. Lastly, we recommend that the Bureau modify the on-going support tiers, so that the 26 hour+ tier is compensated on an hourly basis versus a flat rate. Consistent with the Milestone Payments, many individuals with most significant disabilities require a high level of support early in the process. We believe a flat rate may provide a disincentive to working with individuals with most significant disabilities. We appreciate the Bureau's willingness to continue to explore these important issues and their impact on the Model's goals and objectives. Through on-going dialogue and information sharing, we are confident that a mutually agreeable consensus can be reached.

Thank you very much for your consideration of our comments on the Proposed Hybrid Model. We hope you find that they are constructive and will assist you in planning and implementing a quality and coordinated approach to assuring high quality employment services for Hoosier with disabilities.

Sincerely,



Kimberly Opsahl
President/CEO



Christiaan Campbell
Director, Research and Program Development

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