**Public Comments – Proposed Updates to Vocational Rehabilitation Policies**

**The State of Connecticut, Department of Aging and Disability Services, Bureau of Education and Services for the Blind (BESB) requested public comments on proposed updates to the Vocational Rehabilitation Program policy on Personal Adjustment Training. The public comment period ran from October 14, 2020 through November 20, 2020. A public hearing was held on November 18, 2020. Below are transcripts of the comments received during the public hearing as well as written comments that were submitted during the public comment period.**

**Public Hearing November 18, 2020 Comments:**

**Introduction**

**“My name is Brian Sigman and I am the Director of The Bureau Of Education And Services For The Blind within the Connecticut Department of Aging and Disability Services. I am calling this Public Hearing officially to order at 2:30pm on November 18, 2020. This is a Public Hearing for the proposed changes to the Personal Adjustment Policies for the VR program. Currently on the phone please announce yourself: Mary Burgard- BESB Vocational Rehabilitation Supervisor, Daryl Pease BESB-VR Staff (recording), Tara Brown-Ogilvie, Marchelle Davis affiliated with National Federation of the Blind of Connecticut as a local Chapter President and newly-elected Secretary. All public comments will be recorded and transcribed to be part of the record. So, we’ve called the Public Hearing to order and this is an opportunity if anyone wants to make a public comment they can certainly do so, and those public comments will be recorded and transcribed. There is no obligation to make a public comment, people are welcome to stay on for the entire Public Hearing or are welcome to come in and make their comment and then leave the meeting. There is no formal presentation for a Public Hearing. With that said, if there is a public comment you wish to make about the proposed changes please feel free to do so.”**

**Comment 1**

**“My name is Tara Brown-Ogilvie and I represent the Hellen Keller National Center in the New England region and I wanted to share my comments in this public forum how the HKNC Program provides rehabilitation in a residential setting in the state of New York. It is unique in the fact that it serves people with dual sensory loss between deaf and blind in that spectrum and sometimes it’s really great to have all the specialists from all over the country to come into one place in New York to provide us out of state training. Currently, I understand there’s typically a cap that is about twelve weeks for this out-of-state training that’s not provided within the State of Connecticut. And currently, our program is nineteen weeks and so that allows us to provide a comprehensive assessment along with training on all areas including communication, orientation and mobility, technology, independent living, with communication being the most important for our clients that includes tactile sign language, braille and other forms of alternative communication.**

**So, I ‘m just sharing how I feel about it if there is a basis for extending the twelve week period per individual, say they are able to show progress, show there can be benefits for further training and reports and/or individuals from Helen Keller or another personnel adjustment type organization could provide justification for extending the twelve week period, I think it could be very beneficial for individuals with vision and hearing loss. Specifically, deaf/blindness in my case, but it could be helpful for other individuals for the purposes they need to be able to meet with others who have a similar affliction and are going through some of the challenges and navigating life with vision loss and potentially with some hearing loss on top of that as well.**

**So, to conclude again my name is Tara Brown-Ogilvie and I am the Regional Representative for New England for the Helen Keller National Center and we offer residential programming typically in nineteen week segments and so I feel that by increasing or having more flexibility in this twelve week period under consideration in the state of Connecticut it could benefit those who are deaf/blind consumers in the state of Connecticut.**

**Thank you so much for your time and I appreciate having this Public Forum. Thank you.”**

**Comment 2**

**“For the record my name is Nathaniel Wales and I serve as Treasurer for the National Federation of the Blind of Connecticut. I want to start by thanking Brian for your work putting together this Public Hearing and all of your outreach for letting people know about it and can submit comments….I, as an individual, am in full support of the changes to the Vocational Rehabilitation manual that have been proposed to remove time limits from residential blindness training and using the criteria instead to extend of how well the student is doing and meeting their individual goals for that program. So, I am calling in for full support and hope this can be implemented and gotten out into the field as quickly as possible so that customers in Connecticut can get whatever the best residential adjustment to blindness training that they need to continue that, as quickly as possible.**

**So, thank you.”**

**Closing**

**“Once again my name is Brian Sigman and I am the Director of the Bureau of Education and Services For The Blind within the Connecticut Department of Aging and Disability Services and this has been a Public Hearing for the proposed changes to the Vocational Rehabilitation Policy on Personal Adjustment Training. During the duration of this Public Hearing, there were two public comments that people called in and we have recorded those public comments. At this point in time we are nearing the close of the public comment period and want to check to see if there is anyone on the line who wishes to make a public comment to be sure we haven’t missed anybody …..hearing none, it is now 4:30 and I am officially bringing this Public Hearing to a close.”**

**Written Comments Received:**

**Comment 1**

**From: Tara Brown-Ogilvie <Tara.Brown-Ogilvie@hknc.org>
Sent: Wednesday, November 18, 2020 3:10 PM**

**Addendum to Comment 1 sent via email**

**If I could, I would also like to add to my oral comment in today’s public hearing.**

**RE: For increasing the amount of time and/or flexibility around the 12 week cap for out of state personal adjustment training for consumers with vision and hearing loss in the state of CT.**

**I would like to add that consumers with vision and hearing loss can often take more time to complete training due to communication challenges and the need for additional supports such as tactile techniques and hands-on demonstrations to circumvent loss of both distance senses. Under vision rehabilitation, often auditory methods are used as a replacement distal sense, which is not always possible in deafblind rehabilitation. Instead many times the equipment or instructor must be accessible at arm’s length requiring 1:1 support. For example, instead of teaching an entire classroom about braille letters simultaneously with verbal instructions, a 1:1 session would need to be provided by specialists who understand deaf/blindness and tactile methods such as Tactile America Sign Language (TASL) or use of assistive listening devices. Often with repetition to increase comprehension and retention.**

**In 2020, there was one consumer with vision and hearing loss from CT who attended training at the Helen Keller National Center in New York on a reduced schedule (as the full program is 19 weeks long) but then had to return home to CT due to the closure of the HKNC campus from Covid restrictions. Meaning her time had already been cut short and then her skills and adjustment disrupted in which even more time may be necessary to close the gap in her training. This individual holding a college degree with much promise for employment in the state of CT, may be at a loss when her 12 weeks are depleted. In sum, I would like to see more flexibility around the 12 week allotment, with justification through reporting appropriate progress and detailed reasons for further personal adjustment training.**

**Thank you,**

**Tara Brown-Ogilvie, M.S.Ed., COMS**

**New England Regional Representative**

**Helen Keller National Center**

**Comment 2**

**From: Eileen Akers
Sent: Friday, November 20, 2020 2:22 PM**

**Since documentation regarding the appropriateness of an in-state option is referenced in the proposed policy, I am suggesting that documentation should be similarly referenced where no feasible in-state option exists.

Eileen Akers

Services available through an in-state option as documented in the rehabilitation teaching evaluation or mobility evaluation shall be provided by staff of the Bureau. In situations where ininx is documented that\* no feasible in-state option exists to address the client's employment outcome, the Vocational Rehabilitation Counselor and client shall review the options available for residential personal adjustment programs in order for the client to make an informed decision.**