

Department for the Blind and Vision Impaired

Public Comment and Agency Responses 2023

During the summer and fall of 2023, the Department for the Blind and Vision Impaired (DBVI) received public comment in three formal settings including the June State Rehabilitation Council Meeting, in conjunction with the L.I.V.E program held at the Virginia Rehabilitation Center for the Blind and Vision Impaired, and in collaboration with the National Federation of the Blind State Convention. In addition to these formally announced comment opportunities, DBVI invites input from the public at any time during the year including quarterly State Rehabilitation Council meetings.

The purpose of these meetings was to provide agency stakeholders with the opportunity to comment on DBVI programs and services, to assist with strategic planning, development of agency policies and procedures, and implementation of services and supports to potentially eligible and eligible individuals who are blind, vision impaired, and deafblind. DBVI was interested in receiving comment regarding its three divisions: Services, Enterprises, and Administration.

“DBVI”, “agency”, and “department” means the Department for the Blind and Vision Impaired.

“RT/IL” means the Rehabilitation Teaching/Independent Living program.

“SRC” refers to the DBVI State Rehabilitation Council.

“VIB” means the Virginia Industries for the Blind.

“VR” means the Vocational Rehabilitation Program.
“VRCBVI” and “Center” means the Virginia Rehabilitation Center for the Blind and Vision Impaired.

Information regarding DBVI programs and services can be found at <https://vdbvi.org/> or by calling 804-371-3140, toll free at 800-662-2155.

Comment 1: I am receiving services and am concerned as a potential customer and trainer for technology. I am concerned that people are being trained on Narrator when their employment actually requires JAWS in order for them to maintain their job. I find this most concerning because if I had to use Narrator, it would be ineffective for my employment. It would make work non-accessible.

Agency Response 1: Thank you for your comment. DBVI provides training to individuals to use JAWS and/or Narrator based on the individual’s needs. The agency does train both Narrator and JAWS.

Comment 2: I am an advocate for an individual currently receiving DBVI services. There is significant lack of communication with DBVI staff in the Norfolk Office. In March 2020, the individual completed a referral and due to changes in Norfolk Office counselors, the individual did not get a counselor until March 2023. The counselor went to the individual’s home to develop a plan which would have been initiated in April

2023. By the end of March 2023, the counselor had left the agency and on April 1st, the DBVI denied that the plan had been recorded. The individual contacted the VR Director who confirmed that the plan had not been entered into the individual's record. On April 12, the VR Director called the individual having located the written plan. The individual requested a Victor Reader Stream and DBVI provided a Sony Dictation device which is not acceptable to the individual. On April 16, the individual needed to register for a class and paid for it themselves. By June 8, the individual still had not been reimbursed for the class. DBVI has not tried to help her and the DBVI local office in Norfolk does not receive as much funding as the offices in Richmond, Northern Virginia, or Western Virginia. The individual reported a lack of communication that resulted in a rush to get a plan developed. The Norfolk office is not capable of managing blind people or people with low vision. Everyone in the Norfolk office is sighted and maybe they don't understand people with visual disabilities.

Agency Response 2: The Norfolk DBVI Field Office has experienced turnover in VR Counselors over the last three years and though the agency has tried to ensure that individuals receive services in a timely manner, in some instances, that was not the case. The agency took steps to remedy the situation by having Vocational Rehabilitation Program administrators carry caseloads until VR Counselor Positions could be filled. It should be noted DBVI is not required to purchase an exact piece of assistive technology (service) that an individual may request.

The agency is required to provide assistive technology that will meet the individual's needs in the most cost-effective manner if the service is on the person's Individualized Plan for Employment. Services have been provided to this individual.

Comment 3: I am commenting on the termination of my wife which was unjust because there were multiple mistakes made by the Norfolk manager and the Senior Manager, but the buck really stops with agency Commissioner. My wife has documentation to support that the action by the agency was discriminatory and the agency is going to be held accountable. I have concern about the Commissioner and his recruitment of or interest in hiring blind employees. Many years ago, the agency was a welcome place for blind employees, but now DBVI is basically like the Department of Aging and Rehabilitative Services (DARS), it is a clone of DARS. The Commissioner is more interested in hiring people from DARS than he is hiring folks that are very well qualified blind individuals. There is a conflict-of-interest issue involving the Commissioner, his brother, and his daughter which stinks to high heaven. The Mitchell family has earned about \$250,000 working for the agency during the past year and who is going to complain? The clients can't complain, what are they going to say, "We don't want to work with the Commissioner's brother?" They cannot complain if they feel there is a conflict of interest because from what I understand from DBVI Headquarters and other DBVI staff, the Commissioner rules by fear. His arrogance causes him to have staff refer to him as Dr. Mitchell, but Dr. Mitchell's

degrees are in pastoral counseling. His degrees are not in any agency programs that are recognized, such as VR. That just shows his opinion of himself as far as the Norfolk Office. This is the way things have been handled in the Norfolk area for the past 12 years. It's pretty much a joke.

Agency Response 3: This comment has been addressed privately with the commentor and has been brought, by the DBVI Commissioner, to the attention of Virginia Secretary of Health and Human Resources.

Comment 4: So, \$88,000 a year is what some brilliant person decided to pay the Norfolk Regional Office Manager. Every day I was there, she said one of four things to me, "I know nothing about blindness. I know nothing about technology, adaptive technology. I know nothing about the database. My bosses lied to me every day. I promise you; I won't ever lie to you. Please trust me.". Those are the things she said to me every day, and I think to myself, "How does that happen? How does that happen? And it stems from the top.". I think it was David Bowie that said the worst part of a human being is somebody who strives for and gravitates towards mediocrity. And that's with the Commissioner, in a nutshell. Hmm! Never will be great, he just stays in the middle, buries his head in the sand, and surrounds himself with a bunch of mostly white women who probably make him feel good when obviously he does not. All I want to say is that I hope that today may start the beginning of people finally starting to speak up for any blind, or vision

impaired person the State of Virginia, especially in the Hampton Roads. It is so obvious what has happened there. DBVI is on the fifth Regional Manager right now and there is probably going to be a sixth manager soon and I'm thinking at some point you got it, do I? Pay attention to the person who has done this. Then I can't even say this. Please look at it as the SRC. You have a responsibility to be able to look at the issues. And if you want this DBVI to be DARS, then keep on going. Keep on doing what you're done. If you actually want to have an agency defined by what do did, you do something different. Thank you.

Agency Response 4: Thank you for your comment.

Comment 5: I have been blind since 2017 and have had five counselors. I have not received good service and have been referred to the Choice Group. I have not been able to talk with anyone until recently when the VR Director began serving me. I am concerned that she won't have adequate time to provide services because of her job. This is concerning and disheartening. Why don't people stay employed in the Norfolk Office? Making public comment goes nowhere.

Agency Response 5: Please see Agency Response 2 regarding VR Counselor turnover in the DBVI Norfolk Field Office. Please note that since these comments were made, staffing in Norfolk has stabilized. DBVI welcomes public comment and indeed does act whenever possible to address concerns, especially individual concerns, when issues are brought to the attention of the agency.

Comment 6: I am providing feedback regarding the public comment portion of the June 9th SRC Meeting. I also request that you share this communication with the members of the SRC. The DBVI did a nice job publicizing the meeting and informing consumers of the process for making comments to the Council. I am concerned that some who wished to speak did not get an opportunity to do so. I believe that five individuals spoke, but there were at least four individuals who were turned away due to time constraints, and I heard from at least four consumers in the Hampton Roads area who couldn't figure out how to access the meeting.

To clear up the backlog of consumers who want to address the SRC, I request that the SRC expand the time for making public comments to 15 minutes. After all, the SRC serves as the voice for agency consumers, so members need to be aware of the issues that some consumers experience while participating in VR, especially clients in our region (Tidewater).

It would also be helpful for consumers to be advised in the meeting notice that time for public comment is limited so it is necessary to log on early to ensure that they have an opportunity to speak.

Also, please keep in mind that while some blind folks are very capable users of Zoom, there are some who are not well versed concerning the use of the application, and those individuals should still have the opportunity to comment. A simple

solution to this problem is to ask if anyone joining by phone wishes to make a public comment.

These suggestions would enrich the public comment process for consumers.

Finally, the DBVI and the SRC must recognize that the DBVI has not provided quality services to a lot of folks in our region and make a concerted effort to improve the service delivery model in this area. If services improve, consumers are less likely to need to comment through a public forum.

Thanks to the DBVI and the Council for considering this input.

Agency Comment 6: Thank you for your comments. These comments will be shared with the SRC to help them determine whether a longer public comment time is needed during SRC meetings. DBVI SRC meetings, agendas, and minutes are posted on the Virginia Town Hall no later than two weeks prior to each meeting. The Public Comment portion of the meeting is announced in the agenda as are the zoom link and telephone numbers for individuals who wish call into the meetings. Additionally, SRC meetings are announced on the agency Facebook page and on the DBVI at www.dbvi.virginia.gov .

Comment 7: I was referred to DBVI by a physician after losing vision in one eye because of retinopathy. The physician helped me get a long white cane. I heard about the L.I.V.E program through a DBVI Rehabilitation Teacher. I have been out of work for six months. I receive SSDI. I want to go back to work, I am

only 55 years old. I have gotten glasses and now can read again after receiving vision services. I have learned about rehabilitation technology and low vision aids. I now see hope because of DBVI. I will receive vocational rehabilitation services and I have enjoyed seeing individuals with no vision learning independent living skills.

Agency Response 7: Thank you for your comment.

Comment 8: I would like to have information about budget and how the agency is funded. There needs to more funding at the VRCBVI. I am concerned about lack of services because of lack of resources. I was told there was not enough money, and I could not come to the Center sooner because of funding.

Agency Response 8: DBVI receives a combination of state and federal funds. During 2023, the agency budget for overall service delivery and administration was approximately 23 million dollars and included funds for Rehabilitation Assistance Services (services to individuals through and including VR, RT/IL, Low Vision, Rehabilitation Technology, Deafblind Services, Orientation and Mobility Instruction), Administrative and Support Services, Regional Office Support and administration, State Education Services, and Statewide Library services. Based on federal requirements, if the agency does not have sufficient financial resources to provide services to all eligible individuals applying for VR services, that program closes categories according to requirements of the Order of Selection meaning that a person could be placed on a waiting list. At the time

DBVI was developing these agency responses to 2023 public comments, DBVI had adequate resources to provide services to all eligible individuals; there were no waiting lists for services in any agency program or for any discrete service.

Comment 9: I love the services at VRCBVI and would like to come for training full time. As a Senior Citizen, I was surprised I could come to the Center. Mobility services are excellent in just a couple of days. All the trainers are excellent. How many offices does DBVI has across the Virginia?

Agency Comment 9: Thank you for your comments. The L.I.V.E. program is good at helping older adults with vision loss to learn independent living skills. There are six Regional Offices across Virginia with one each in Norfolk, Fairfax, Richmond, Staunton, Roanoke, and Bristol.

Comment 10: I was so worried when I first found about being blind. I had low vision and could not read. I had car accidents. I learned about VRCBVI through someone at the grocery store. Dr. Baldwin provided me with low vision services. Coming to the Center I have learned a lot but have been overwhelmed with all of the programs. I would rather be able to focus on individualized services than participating in all the services at VRCBVI as required. I want individualized services rather than all of the required services.

Agency Response 10: In general, services provided by DBVI are designed to meet the specific needs of individuals receiving services and delivered through an individualized plan developed

between the person and a counselor or teacher. When more intensive services/training are needed, the person may attend VRCBVI. Provided in a residential setting that also includes commuter students for six-to-nine-months, the VRCBVI curriculum includes orientation and mobility, personal home management, braille, keyboarding and access technology, conversations about blindness, vocational services, health education, wellness instruction, recreation, case management, and low vision services. Students to attend the Center are generally expected to participate in the full curriculum.

Comment 11: Are these public meetings open to the general public? The question is, what happens next?

Agency Response 11: DBVI and the State Rehabilitation Council use public comments to help develop the VR State Plan and to improve services in general.

Comment 12: How does the CARE Van system in Richmond works.

Agency Response 12: According to their website, information regarding the Greater Richmond Transit Company (GRTC) CARE and CARE Plus services provide origin-to-destination services under the guidelines of the Americans with Disabilities Act (ADA). Further information about CARE and CARE Plus can be found at the GRTC website

<https://ridegrtc.com/services/specialized-transportation/care/>
or by calling 804-358-4782.

Comment 13: Can DBVI help people set up support groups in their home communities.

Agency Response 13: DBVI does not establish or facilitate support groups but does share information about such groups with individuals served by the local Regional Offices.

Comment 14: Does DBVI have enough funds to serve everyone? There are not enough providers of vision services in local communities. Why isn't there enough money to serve everyone?

Agency Response 14: Thank you for your comment. See Agency Response number eight regarding agency funds.

Comment 15: I have three years of experience trying to get services. It has taken too much time and I have not gotten enough services in timely enough fashion. It has been a long-time receiving service. I never heard back from the agency.

Agency Response 15: DBVI staff at the public meeting where comment 15 was made met with the individual to make sure necessary connection was established with the Regional Office in the individual's locale.

Comment 16: How come a lot of physicians don't really know about this type of organization when the services are fantastic.

Agency Response 16: Unfortunately, not all physicians know about DBVI. The agency does make efforts at the Regional Office level to establish contact with local ophthalmologists and

optometrists so individuals receiving treatment or glasses can learn about DBVI.

Comment 17: I have heard numerous complaints about the lack of prompt services from the field offices, especially Roanoke and Staunton. I am concerned that there isn't enough money; this is the message that has been given from the field.

Agency Response 17: Thank you for your comment. DBVI has had some staff changes in the Roanoke and Staunton offices that may have caused delay in services in some instances. These delays should no longer be occurring. Please see agency response eight regarding budget.

Comment 18: Clarify how information will be shared in the future. I would like a recap in writing of what the training days includes and what I have learned. Please explain acronyms.

Agency Response 18: Agency acronyms are included near the beginning of this document to help readers. Public Comment and Agency Responses are available to the public upon request and are posted on the agency website. Additionally, this information is shared with the State Rehabilitation Council.

Comment 19: There is loneliness that people feel by themselves in the community, we don't even know what to ask about. Losing my sight was overwhelming. It would be helpful to provide people with information about resources and contacts and information from the very beginning. More resources in the very beginning to help with the confidence. Emotional and psychological support in the

beginning would help. How to adjust to the loss of blindness – like counseling support to adjust to blindness. Understanding of blindness. Resource list of community supports. Provide information about the supports in the community.

Agency Response 19: Thank you for this comment. DBVI tries to provide resources and supports to adults and students through the Regional Offices, VRCBVI, websites, and newsletters. The agency website, <https://www.dbvi.virginia.gov/>, includes extensive information about services, resources, publications, boards and councils, job opportunities, and other interesting information. Additionally, once entering the site, a pop-up appears that provides readers with the opportunity register to receive email updates from DBVI. VRCBVI has its own website at <https://www.vrcbvi.virginia.gov/>. Information about DBVI's Enterprise division can be found at <https://www.vibonline.virginia.gov/>. The agency toll free number is 800-622-2155.

Comment 20: People need connections with other people going through the same experience. There is not enough time to connect with staff about things other than services. We need to hear about resources more than once. It takes time for older people to learn new things.

Agency Response 20: Thank you for your comment. Thank you for the reminder that it is helpful to provide resources more than once. Also, please see Agency Response 19.

Comment 21: How about virtual brown bag lunch topics – get the experts to be available to provide support and access to experts. Consider doing podcasts about some of the topics that are interesting to older adults.

Agency Comment 21: Thank you for these good ideas.

Comment 22: This commentor noted that they have been active as a client for three years and have been happy with services received by their Rehabilitation Teacher, Orientation and Mobility Instructor, and the Health Educator at VR CBVI. The commentor also expressed having had three mobility instructors and would like something done about that.

Agency Response 23: Thank you for your comment. DBVI has had turnover in Orientation and Mobility Instructors and is actively recruiting for individuals to fill those positions.

Comment 24: For seniors trying to get service from DBVI, it takes six weeks and a whole lot of paperwork. How can DBVI make it faster and easier for seniors to receive services? Several months ago, a consumer asked her RT for an OM referral, was told it was very easy to do, and this was back in May 2023, but still waiting. The consumer is concerned because she is beginning to lose more vision and anxious about going out at night. Wondering how much longer she'll have to wait and what else can she do?

Agency Response 24: This comment is very timely as DBVI reviews the need for rapid response across programs and how the agency can expedite services by using qualified staff to make eligibility decisions without as much supporting documentation. DBVI has been selected for intensive technical assistance with Mississippi State University which will include focus groups and a needs assessment. The NFB, the Silver Bells, and other advocacy groups will be included in the focus group activities associated with the technical assistance project.

Comment 25: This commentor, who had previous experience working with the Client Assistance Program, had comments about when individuals receive paperwork from DBVI. One person told the commentor that the VR counselor interviewed the person and sent paperwork for the person to sign. Individual had no mechanism to read the documents. The commentor hopes it was an isolated incident and wants to make sure that isn't common practice because the practice is totally unacceptable. VR Counselors need to fully explain paperwork so that individuals can understand. The Regional Manager was very helpful in addressing the issue for the person.

Agency Response 25: Thank you for your comment. DBVI agrees that agency staff should explain paperwork and strives to ensure that individuals have any assistance they might need to sign required documents.

Comment 26: We are thrilled that you are here. We recognize that DBVI staff have connections with positive role models and people with expertise. DBVI leadership have been attending NFB national conventions and found that valuable and including the ability to recruit throughout the county. We think it would be valuable for every DBVI employee to attend at least one state advocacy meeting to network and build relationships, and also create opportunities for individuals to attend the national convention.

Agency Response 26: Thank you for your comment. DBVI values the relationships it has developed with the NFB over the years. While it is not always feasible for DBVI employees to attend state advocacy group meetings, the agency values the opportunities that staff do have to participate in national conventions and to conduct public meetings in conjunction with the NFB state convention.

Comment 27: DBVI has supported me as a working adult, both VR and VRCBVI. I work for the military and been able to get JAWS tutoring at home and O&M. This has been very helpful that I've been able to continue to work, haven't had to quit work for 6-9 months. I appreciate it very much and have met so many blind people from across the country. I hear stories of so many blind people who lose their jobs and drop out of the workforce. I'm grateful the department has been here to help me, and I would like to know if there are any programs that can

be promoted to keep working adults in the workforce while they learn the skills of blindness and provide for their families.

Agency Response 27: Thank you for commenting and DBVI is glad you've had a good experience. The VR program continues to evolve, particularly when the federal law changes. Job retention is very important and with the Workforce Innovation and Opportunity Act, we talk about survival jobs someone needs to support their family, but that may not be the end goal. The VR program can help with that as well by helping people transition into different jobs while still working.

Comment 28: Concerned about VR, and wonders if there would be hours that are more feasible for seniors to work. Maybe six hours/day instead of eight and not every day of the week.

Agency Response 28: DBVI works with eligible individuals, including seniors, in the VR Program to find the work opportunities that best meet the skills, interests, and abilities of the individual. Some people work part-time jobs if that is what best suits their needs.

Comment 29: Good evening and thank you for being here. I have been approached by several people today. How does DBVI define a senior citizen?

Agency Response 29: DBVI provides services to older individuals aged 55 or over through the Older Blind Grant, RT, and can provide Orientation and Mobility services, as well. VR

Services are also available to eligible individuals aged 55 and older.

Comment 30: What an amazing agency. Thank you for what you do. I've been learning the difference between integrated and not integrated environments. Could you give some clarity and understanding of that guidance.

Agency Response 30: The DBVI VR program primarily provides services to assist individuals to obtain, maintain, or regain competitive integrated employment based on federal requirements. Integrated means that people who have disabilities and people who don't work the same types of jobs in the same settings; it isn't just people with disabilities in a separate setting away from people who don't have disabilities. Competitive integrated means employment in the community for which anyone can apply. Jobs that are not competitive integrated include some positions with the Virginia Industries for the Blind (VIB) that only individuals who are blind, vision impaired, or deafblind can hold. Some of the jobs at VIB are competitive and integrated and others are not but still pay a competitive wage. Sometimes, there are also jobs in the community that may or may not be competitive integrated employment opportunities. What is important to remember is that individuals receiving services from the VR program have the right to make informed choices about the kind of employment they want whether it is competitive and integrated or not.

Comment 31: The Lions Club of Virginia Beach is having a resource fair on November 11, 2023. I think our needs are a little different as seniors; I'm never going back to work.

Agency Response 31: Thank you for your comment. DBVI provides services to people aged 55 and older who are not interested in employment and who want to live independently. These services are provided through the Rehabilitation Teaching Independent Living Program which includes the Older Blind Grant. DBVI works very closely and collaborates with the Mississippi State University Older Individuals who are Blind (OIB) Technical Assistance Center (TAC). The entire focus of the OIB-TAC is providing resources, training, and courses that focus on serving older individuals who are blind or have low vision. Further information about that program can be found at <https://www.oib-tac.org/>.

Comment 32: Does DBVI provide services to undocumented individuals? If so, would it be first come first serve, or would citizen go first?

Agency Response 32: Based on federal requirements, the VR Program can only serve individuals who are eligible to work, and it is the responsibility of the individual applying for services to demonstrate that they can work in the United States. In some instances, other programs through DBVI can serve individuals who are not eligible to work in the United States. DBVI has not been in and does not anticipate being in a position where individuals are unable to receive services based on their

immigration status except in the VR program where proof of ability to work in the United States is required. Currently, there are no waiting lists for services in any of the agency programs.

Comment 33: Thanks to the Commissioner and staff for email blasts and publicizing events sponsored by the agency. The Coordinator of Senior Bells Program notes that the program is not designed to take the place of DBVI, but to supplement services.

Agency Response 33: Thank you for your comment; DBVI appreciates programs that support individuals who are blind, vision impaired, or deafblind.

Comment 34: There is a need for more assistive technology training for employment and other reasons. I've heard DBVI has contracted a pilot program for assistive technology training. How do we get access to this training?

Agency Response 34: The pilot program referenced in this comment was a program offered through the DBVI VR program by Clusiv. Unfortunately, since the time of this comment, the pilot with Clusiv ended and the company has since closed.

Comment 35: This commenter would like more information on Clusiv. He signed up for webinar on 11/07 and is also interested in something NIB has to offer, where you get CCNA certified- would like information on that. Does DBVI have any resources where blind people can get computer certifications for free?

Agency response 35: DBVI is always looking for additional resources for training and certifications. DBVI will consider sponsoring training and/or certifications for individuals when those services are required for the individual to accomplish the vocational goal on their Individualized Plan for Employment. For information about computer certification programs, please contact your VR Counselor or DBVI's Director of Rehabilitation Technology.

Comment 36: DBVI has a college sponsorship program and sometimes compares the cost of an out-of-state program to the cost of an in-state program. There should be a consistent practice for how the agency supports students participating in programs out of state. There shouldn't be any incentive to choose one university over another.

Agency Response 36: Thank you for your comment. The DBVI VR policy on college sponsorship is detailed and complex and includes consideration of whether a student's academic needs to accomplish their vocational goal can be met at an in-state school; it also includes whether the student's academic needs can only be met at an out of state school. The VR program will pay up rate of the public in-state school college closest to the college the student wants to or is attending out of state with the student being responsible for the remaining amount unless the student's academic program can only be found at an out of state college in which case, the agency will pay the full cost. The agency is open to reviewing this policy regarding the

sponsorship of out of state programs. The internal agency review would be to determine whether revision is warranted, ensuring the policy conforms to federal requirements, and review and approval by the Commissioner. A substantial change in policy could also include formal public comment on the Virginia Town Hall and review and approval by the Secretary of Health and Human Services.