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June 4, 2019

[VIA EMAIL OVRFeedback@pa.gov](mailto:OVRFeedback@pa.gov)

Ms. Cindy Mundis
Office of Vocational Rehabilitation
1521 North Sixth Street
Harrisburg, PA 17102

RE: Proposed Amendment to Close All Categories to the Order of Selection of the Vocational Rehabilitation Services Portion of the Commonwealth's Workforce Innovation and Opportunity Act Combined State Plan

Dear Ms. Mundis:

The Institute on Disabilities at Temple University (IOD) is one of the sixty-seven University Centers for Excellence in Developmental Disabilities Education, Research and Service funded by the Administration on Developmental Disabilities, U.S. Department of Health and Human Services. In this capacity, we believe that, everyone deserves the opportunity and support to lead a self-determined life in inclusive communities. This includes the opportunity to choose work in a competitive, integrated setting.

We appreciate the opportunity to comment on OVR's proposed closure of the Order of Selection (OOS). As you know, OOS is the manner in which Pennsylvania prioritizes individuals who are seeking OVR services. OOS is used to ensure that individuals with the most significant disabilities are served first. Thus, we are very concerned about how this closure will

impact Pennsylvanians with disabilities who want to work. Our comments are as follows:

The IOD opposes closure of the current Order of Selection. We believe that this is a rushed decision that was made without an opportunity for adequate stakeholder input.

Stakeholder Engagement: While OVR's justification includes that the decision was shared at public meetings with stakeholders, the information was not disseminated widely enough prior to the OVR Board voting on the closure of the Order of Selection. Stakeholders would have had to have known to seek out the agendas for these meetings or obtained a copy of the agendas in advance in order to know that this was being considered and then plan to attend the meeting. We do not believe that the Stakeholder engagement was robust enough on a decision as important as this.

In addition, robust stakeholder engagement would involve more in-depth analysis and data as to how OVR ended up in this position, and stakeholders could propose alternative solutions. For these reasons, we respectfully request that OVR engage in a transparent and robust stakeholder process prior to implementing any changes to the Order of Selection. It is not appropriate to move forward at this time with the closure, especially with the closure being announced for implementation on July 1, 2019.

July 1st Implementation date: Under the current proposal, the Order of Selection will be closed on July 1, 2019, if approved by RSA. While OVR continues to encourage people with disabilities to apply for services, this serves no purpose because of the proposed implementation date.

The closure was announced in the PA Bulletin on May 4, 2019. An interested individual would not have adequate time to apply, receive an eligibility decision, and get an approved IPE in order to be eligible to receive services prior to the closure of the OOS on July 1. Thus, the message OVR is sending with this rush to close the order is "we are not open for business".

Contrary to "Employment First" Legislation: As you are aware, Pennsylvania law makes Pennsylvania an "Employment First State". "Employment First" is more than just a catch phrase. It sets forth a change

in thinking, and a mandate that all people have the option to choose work, regardless of disability. OVR is a vital partner in ensuring that the Commonwealth is successful in ensuring that people with disabilities have access to employment supports and services to obtain competitive integrated employment. Closing the Order of Selection defies those principles and makes obtaining employment supports more difficult for citizens with disabilities.

Recommendations: Rather than close the order as of July 1, 2019, we recommend that OVR:

1. Convene an open, transparent workgroup of interested stakeholders who will engage with OVR to discuss all possible options to address OVR's current financial situation;
2. Delay any closure of the OOS until such time as OVR publishes a summary including its analysis and data to explain all options considered, and why closing the order is the best option for OVR and Pennsylvanians with disabilities;
3. Delay any closure of the OOS until such time as OVR provides an additional thirty day public comment period in response to OVR's published summary and data, and;
4. Engage with the state legislature to urge allocation of additional state funds so that OVR services may continue as they currently are.

Very truly yours,



Celia S. Feinstein
Executive Director



Jamie Ray-Leonetti
Policy Director