

NEW MEXICO COMMISSION FOR THE BLIND

STRATEGIC PLAN

September 1, 2019 through October 1, 2022

(1) EXECUTIVE SUMMARY

The Commission for the Blind (“Commission”) develops the strategic plan through discussion and input from a variety of Key stakeholders, including the State Rehabilitation Council. The State Rehabilitation Council (SRC) is established by the Rehabilitation Act of 1973, and is required to be comprised of a majority of individuals who are legally blind, and who represent a variety of stakeholders. As part of this process, town forums and public meetings were held throughout the State. The purpose was to gather information and provide the public with an opportunity to offer input on the Strategic Plan. The Strategic Plan was discussed and reviewed by the Council on August 8, 2019. The Commission for the Blind met on August 29, 2019, and approved a revised Strategic Plan through September 30, 2022.

(2) INTERNAL AND EXTERNAL ASSESSMENTS

a. Situation Inventory

The Commission is the key state agency for providing and integrating services for adults who are legally blind. The Commission has historically produced a very high level of quality employment outcomes achieved by Commission consumers, and the Commission continues to place a high emphasis on quality employment outcomes.

The Executive Director serves on the State Workforce Development Board, and the Deputy Director serves on the Central Area Local Workforce Development Board. Commission employees also serve on numerous other councils and entities, including the New Mexico Council for Purchasing from Persons with Disabilities, the Statewide Transition Coordinating Council, the Deaf-Blind Task Force, and the New Mexico Technology Assistance Program. The Executive Director also has the national perspective as a Past President of the National Council of State Agencies for the Blind (NCSAB), and his continued service on the NCSAB Executive Committee.

b. Environmental Scan

The Commission is governed by the Rehabilitation Act of 1973. On July 22, 2014, President Obama signed the Workforce Innovation and Opportunity Act (WIOA). WIOA reauthorized the Rehabilitation Act of 1973, and imposed a new requirement that 15 percent of the Vocational Rehabilitation grant be reserved and spent on provision of Pre-Employment Transition Services (Pre-ETS) for students who are age 14 to 21. The Commission is also governed by regulations and subregulatory guidance issued by the Rehabilitation Services Administration (RSA), which is a program within the United States Department of Education. RSA issues regulations, policy directives, and technical assistance circulars which interpret the Rehabilitation Act and the Randolph-Sheppard Act. RSA is also covered by fiscal regulations, specifically the Uniform

Guidance, 2 CFR Part 200. 2 CFR Part 200.407 requires that Vocational Rehabilitation agencies obtain prior written approval from RSA for 25 different federal cost categories. As a result, the Commission must now obtain federal prior approval for many items of assistive technology that are commonly purchased for consumers. RSA strictly applies these applicable fiscal and program rules, some of which only apply to the Vocational Rehabilitation program. This includes 34 CFR 361.63(c)(2), which requires Vocational Rehabilitation agencies to first spend program income before other sources of federal funds. This is a requirement that applies uniquely to the Vocational Rehabilitation program. The federal vocational rehabilitation grant is also subject to a maintenance of effort (MOE) requirement. The Commission is obligated to observe these very complex regulations, policy directives, and technical assistance circulars.

The Commission provides its services in partnership with the State Rehabilitation Council (SRC), whose members are appointed by the Governor. The Commission also works with a committee of blind vendors, whose members are elected by the licensed blind managers who run vending facilities pursuant to the federal Randolph-Sheppard Act, as well as the companion state vending law at NMSA 22-14-24. Additionally, the Commission is governed by various state statutes and regulations, including the Commission for the Blind Act which established the Commission and created a three-person board of directors appointed by the Governor. The Commission is also a partner under the Workforce Innovation and Opportunity Act. The Commission must also operate pursuant to other applicable law, including the state Human Rights Act, the Governmental Conduct Act, the Open Meetings Act, the Per Diem and Mileage Act, the Procurement Code, Section 102 of the Rehab Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act.

The recovery of oil prices and expanded drilling for gas and oil have significantly increased state revenues, and New Mexico is now experiencing large budget surpluses. The prior decrease in oil prices had previously resulted in state budget deficits and a reduction in the Commission's state general fund appropriation of approximately \$250,000. In addition, the federal requirement to reserve and spend 15 percent of the Vocational Rehabilitation grant on Pre-Employment Transition Services has reduced the amount of federal vocational rehabilitation funds that are available to serve the Commission's adult vocational rehabilitation consumers. Across the nation, the 15 percent reserve has forced many Vocational Rehabilitation agencies to implement waiting lists for adult services due to a lack of funding for those services. This was an unintentional consequence of the Pre-ETS reserve.

c. Anticipation or Foresight

Population Served

The Commission serves populations which can be placed into two basic groups;

- *Persons who receive vocational rehabilitation services and have an employment goal
- *Persons who receive independent living services and have an independent living goal

There are significant trends that can be identified in regard to both population groups.

Employment and Vocational Rehabilitation

Transition Services

The Commission helps young persons who are preparing to leave the school setting, including students aged 14-21 who are in transition either immediately to work, or to college or vocational training settings. Within this population of young person's there are several important trends which can be identified, including:

- *Increasing numbers of students with Optic Nerve Hypoplasia and multiple disabilities;
- *Decreasing rates of literacy, including in both print and Braille;
- *Increasing numbers of students who require assistive technology services;
- *Increasing numbers of students with delayed maturation resulting in "failure to launch;"
- *Increasing numbers of students with inadequate academic social, and independent living skills.

The Commission is seeing a dramatic increase in the number of consumers with Optic Nerve Hypoplasia. Optic Nerve Hypoplasia (ONH) has increased significantly over the last thirty years, and ONH is now the leading cause of blindness in children. There is also a significant increase in the rate of diabetes in children. According to the National Institutes of Health, from 2002 to 2012, there was an annual increase of type I diabetes in youth of 1.8 percent, and an increase in youth of 4.8 percent for type 2 diabetes. This increasing prevalence of diabetes in children will likely result in a growing number of consumers with blindness due to diabetic retinopathy. These consumers will likely have other diabetic complications that will need to be addressed. The rate of blindness due to prematurity continues to be a concern, and infants born prematurely have higher rates of disabilities in addition to blindness.

The reduction in Braille proficiency is resulting in a corresponding decrease in overall reading skills and literacy, as well as decreased skills in Braille math. Persons who have strong Braille skills have also been shown to have a better chance of becoming successfully employed. This trend is primarily due to decreased use of residential schools for the blind, the trend within local schools to mainstream blind students, the shortage of qualified teachers of the visually impaired, and the use of audio books, magnification, or other reading methods which are sometimes substituted inappropriately for Braille. The Commission will need to provide these students with additional support and training for them to achieve a successful employment outcome, including through services provided at the Orientation Center in Alamogordo and at the Skills Center in Albuquerque.

The advent of the internet and computer revolution has caused a corresponding increase in the need to provide transitioning students with assistive technology that is adapted for use by the blind. Many school districts lack both the expertise and resources to provide this assistive technology. In addition, there exists a serious gap with respect to technology that is used at home, with many parents being unable to afford the needed assistive technology. Where appropriate, the Commission attempts to provide this assistive technology to assure that the transitioning student has the greatest opportunity for a successful employment outcome. The Commission receives "Technology for Children" funding through a memorandum of understanding with the Department of Health. The Technology for Children program serves as an outreach activity to build and strengthen relationships with school districts, to provide information about vocational rehabilitation services to

schools and parents, and to remove barriers that might otherwise impede the employability of vocational rehabilitation consumers. The Technology for Children program also identifies visually impaired students who are eligible for Commission services, helping to prepare these students for participation in the Commission's vocational rehabilitation program.

The Commission is also seeing a greater number of young persons who are delayed in their social skills and maturation, and who lack academic and independent living skills. Some of this is due to the increased prevalence of conditions that include multiple impairments, and some of it is due to the national "failure to launch" trend that applies to many young persons in general, it is resulting in greater numbers of Commission consumers who are less prepared to participate in their vocational rehabilitation programs, including programs provided at the Orientation Center in Alamogordo and at the Skills Center in Albuquerque.

To further enhance transition services, the Commission has established written agreements with the state's school districts. The Commission has focused the initial effort on the medium-sized school districts that are most likely to have blind and visually impaired students, and that also have greater challenges due to their individual rural and socio-economic factors. To date, the Commission has signed Memorandum of Understanding with Las Cruces Public Schools; Farmington Municipal Schools; Carlsbad Municipal Schools; Portales Municipal School District; Clovis Municipal School District; Deming Public School District; Roswell Independent School District; Taos Municipal Schools; Española Public School District, Aztec Municipal School District, Los Lunas School District, and Gallup-McKinley County Schools, Bloomfield School District, Cloudcroft Municipal Schools, Pecos Public Schools, Gadsten School District, and Moriarity-Edgewood School District.

The Pre-Employment Transition Services requirements of the Workforce Innovation and Opportunity Act (WIOA) have placed a significant financial and administrative burden on vocational rehabilitation agencies, including the Commission. WIOA requires that vocational rehabilitation agencies reserve and spend 15 percent of the Vocational Rehabilitation grant on specified transition services for students aged 14 to 21. The Rehabilitation Services Administration has issued regulations and subregulatory guidance that do not allow the reserved funds to be spent on services such as college tuition and computers. In addition, administrative costs cannot be charged to the reserve. While some transition services are expanded, some very important transition activities can only be met using the regular portion of the Vocational Rehabilitation grant. The net result is that fewer funds are available to serve adults, and ironically fewer funds are available to pay for transition services such as tuition and computers.

Adult Vocational Rehabilitation

There are six primary trends which can be seen in the vocational rehabilitation services that are provided to adults:

- *Fewer persons are electing to participate in the workforce;
- *More consumers are graduating later in life and being employed at older ages;
- *More consumers have multiple disabilities;
- *More consumers lack Braille skills;

- *More consumers need proficient computer skills to graduate and become employed.
- *More adults are remaining employed beyond the traditional retirement age.

To a large extent, the trends that are seen in the area of transition services will very much shape the face of the vocational rehabilitation services that will be provided over the next 3 years to adults. The most significant of these is probably the increasing rate of Optic Nerve Hypoplasia, which will result in an increasing number of consumers needing greater amounts of vocational rehabilitation services. Another factor is the increasing prevalence of diabetes. The lifetime risk of diabetes has doubled in the last 20 years, with males born in 2000 having a 32.8 percent lifetime chance of developing diabetes, and females born in 2000 having a 38.5 percent lifetime chance of developing diabetes. For Hispanics born in 2000, the lifetime risk for males is 45.4 percent, and 52.5 percent for females. The increasing prevalence of diabetes will likely result in a growing number of consumers with blindness due to diabetic retinopathy. The “failure to launch” trend that is seen in the “20-Somethings” generation is also present in the population of persons who are blind and visually impaired. These consumers will also require more vocational rehabilitation services, including services provided at the Orientation Center in Alamogordo and at the Skills Center in Albuquerque.

The Great Recession reduced both the number and quality of the employment outcomes achieved by Commission consumers. With the state economy growing and generating improved rates of employment, the Commission is starting to see improvement in the number and quality of employment outcomes. However, the federal government remains a major employer in New Mexico, and Sequestration continues to result in significant reductions to the number of federal employees, as well as to persons employed by federal contractors. State and local governments have historically been a significant source of employment for persons who are blind or visually impaired, and it is anticipated that the improved state economy will also result in additional employment outcomes.

The “graying of the population” is resulting in increased numbers of persons electing or needing to remain employed beyond the traditional retirement age of 65. Approximately 20 percent of persons 65 and older are currently working. According to an Associated Press poll, 23 percent of persons say that they will never retire, and approximately 25 percent say that they expect to work beyond the age of 65. There is a strong correlation between age and blindness, and the Commission can expect that many of these older workers will require vocational rehabilitation services.

Independent Living and Older Blind

There are two primary trends that are identified in the area of independent living:

- *Increasing numbers of consumers due to the aging of the population; and
- *Increasing use of technology by seniors and other persons who are blind or visually impaired.

The Commission provides independent living services which help blind persons to live in their own homes and communities. Most of these persons are newly blind and over 55 years of age (older blind). Because of the aging of the population, the number of older blind Americans is predicted to increase dramatically. According to the American Community Survey, there are 31,092 seniors in

New Mexico who are 65 and older and who report having serious difficulty seeing. In addition, 3.5% of Americans over 65 are legally blind. The aging of the population is also resulting in an increase of the number of persons who are deaf-blind.

The Commission had responded to the need for additional independent living services by adding a second independent living teacher to serve the Las Cruces area. Las Cruces was selected because of the high number of retirees in southern New Mexico. The Commission hopes to increase the number of independent living teachers as the economy recovers.

(3) SUCCESSION PLANNING

Succession planning is a critical need for vocational rehabilitation agencies. It is even more urgent for state agencies for the blind as such agencies concentrate management, fiscal, and administrative functions in fewer individuals, making each individual critically important to the overall operation of the agency. There is also a shortage of professionals who are qualified to hold many of these positions, and most especially of qualified professionals who are blind. In addition, state budget reductions have further concentrated critical duties in key staff. At the same time, regulatory and administrative burdens have significantly increased. To prevent knowledge collapse, the Commission must anticipate the departure of key employees and plan accordingly.

The Commission has only had four executive directors in its 32 year history. The current executive director has served since 1999. Changes in administration in Santa Fe have never resulted in removal of the agency director.

The Commission will maintain an awareness of the possible and likely departure schedules of key employees, as well as the departure of other staff which may engender succession difficulties. Maximum effort will be undertaken to seek exceptions to any hiring freeze, and to cross-train and mentor key employees. The Commission will also seek to find ways to insulate vital computer systems from staff departures. To the maximum extent possible, the Executive Director and Deputy Directors will work to time retirement or departure schedules to lessen the impact.

(4) DISASTER RECOVERY

The post-911 environment requires additional consideration of disaster and threat assessments. The Commission maintains a disaster recovery plan wherein a backup of the information on the Commission's computer network is maintained outside the Commission's physical office space. The Commission's email accounts are also protected from the increasingly sophisticated spear-phishing attacks. The Commission will continue to monitor risk levels, and will implement new procedures or otherwise modify the disaster recovery plan accordingly.

(5) BENCH MARKING

The Commission seeks to provide persons who are blind with meaningful employment, consistent with their "strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice." The Commission's vocational rehabilitation program consistently has a high average starting wage of consumers compared to the average state wage, and has a high percentage of

consumers with competitive employment outcomes. With the passage of the Workforce Innovation and Opportunity Act, the Commission will now be measured in the same fashion as other workforce programs. The independent living and older blind programs are more difficult to measure as quantifiable measurements such as starting salary and employment outcomes are not available. The Commission continues to serve an increasing population of persons who are older blind. The Commission has implemented measurements which will provide information as to how services are delaying or avoiding placement in a nursing home, as well as reducing or eliminating reliance on Medicaid services.

(6) AGENCY GOALS AND PRIORITIES

The following goals and priorities were jointly developed and agreed to by the Commission for the Blind and the State Rehabilitation Council. They were discussed and approved at a regular meeting held on February 22, 2018.

- a. Enhance the number and quality of employment outcomes by partnering and working with community colleges and One-Stop centers to more effectively utilize services available through the Adult Education and Family Literacy Act, Adult, Dislocated Worker, Youth, and Wagner-Peyser programs.
- b. Enhance the number and quality of employment outcomes by working cooperatively with the New Mexico Department of Health so as to develop opportunities for competitive and integrated employment for persons who are blind or visually impaired, which will be accomplished by working in partnership with the Medical Assistance Division, the Developmental Disabilities Supports Division, and the Behavioral Health Services Division.
- c. Enhance the number and quality of employment outcomes by using the Orientation Center to provide employment preparation training for adults and transition students, including through the addition of an apartment training facility to be constructed adjacent to the Center. The proposed apartment facility will increase the capacity of the Orientation Center, will enable the Orientation Center to provide more realistic training, will eliminate the need to rent costly and less appropriate private apartments, and will reduce the number of instances in which costly out-of-state training will be necessary to meet the needs of consumers.
- d. Increase the number of consumers served through enhanced Outreach Activities; including media outreach, use of paid advertising, through increased collaboration with ophthalmologists and optometrists, and through the use of the Technology for Children program to conduct outreach to school districts.
- e. Enhance the number and quality of employment outcomes of transition consumers by providing enhanced Pre-Employment Transition Services, including assistive technology where appropriate as a part of an Individualized Plan for Employment, by providing assistive technology through the Technology for Children Program, by conducting increased outreach activities, by conducting educational activities to meet the specific needs of transition students, and by increasing proficient use of Braille and Braille math.

f. Enhance the number and quality of employment outcomes achieved by consumers by providing services in a way that genuinely honors the "informed choice" provisions of the Rehabilitation Act, enabling Commission consumers to have the opportunity to obtain employment at higher levels of compensation.

g. Enhance the number and quality of employment outcomes achieved by consumers by providing a quality and expanding Newsline system that gives consumers access to employment listings, business news, and other important information, including through both local Newsline and through NFB-Newsline.

h. Enhance the number and quality of employment outcomes by innovatively using the Skills Center to meet the needs of vocational rehabilitation consumers and potential vocational rehabilitation consumers, including using it for provision of services to transition students.

i. Enhance the number and quality of employment outcomes through the provision of independent living training to vocational rehabilitation consumers, including through the proposed apartment training facility at the Orientation Center.

j. Enhance the number and quality of employment outcomes for consumers who are Deaf-Blind through collaboration and partnership with the Division of Vocational Rehabilitation, with the Community Outreach Programs for the Deaf, and with the Commission for Deaf and Hard of Hearing, including through the delivery of assistive technology to consumers who are Deaf-Blind.

k. Enhance the number and quality of employment outcomes through the Business Enterprise Program (BEP) by shortening the time required for vendors to complete the required training, including by using Randolph-Sheppard Act training offered by the Hadley Institute for the Blind and Visually Impaired.

l. Enhance the number and quality of employment outcomes by strengthening administrative services so as to timely and accurately submit federal reports, to assure compliance with all applicable fiscal regulations, and to comply with all applicable accounting standards.

m. Enhance the number and quality of employment outcomes by enhancing overall performance and productivity by engaging in activities designed to mitigate and ameliorate the impacts of blindness and visual impairment, and by engaging in outreach and other activities designed to identify additional potential consumers, and by making the public and medical community more aware of Commission services.

n. Enhance the number and quality of employment outcomes for consumers by providing enhanced benefits counseling and guidance to reduce concerns related to the loss or reduction of benefits.

(7) AGENCY MISSION STATEMENT and OVERVIEW

Mission Statement

Our mission is to enable persons who are blind to achieve vocational, economic and social equality by providing career preparation, training in the skills of blindness and above all, promoting and conveying the belief that blindness is not a barrier to successful employment, or to living an independent and meaningful life.

Overview

The Commission was created in 1986 with the passage of the "Commission for the Blind Act" Section 1 through 9 {28-7-15 to 28-7-23 NMSA 1978}. The Commission provides services to any qualifying legally blind and visually impaired citizen residing in the state of New Mexico.

The nature of the Commission's work is determined by the federal Rehabilitation Act, as well as the powers and duties set forth in The Commission for the Blind Act. The Commission for the Blind Act states that the Commission shall:


- a. apply for and receive money from any state or federal agency to be used for purposes relating to blindness and receive on behalf of the state any gifts, donations or bequests from any source, to be used in carrying out the Commission's duties;
- b. maintain a complete register of blind persons domiciled in New Mexico;
- c. maintain bureaus of information and industrial assistance to help blind persons find employment, train them in work which may be pursued in their own homes and assist them in merchandising and marketing their goods;
- d. establish, equip and maintain a center with qualified instructors for vocation, industrial and other training of eligible blind persons. The Center shall also provide for orientation and assistance for the adjustment of blind persons;
- e. research and study the causes of blindness and its prevention in cooperation with the state or any other entity which the Commission deems appropriate;
- f. cooperate with appropriate state agencies in the adoption and carrying out of preventive measures relating to blindness;
- g. promulgate rules and regulations necessary to effectuate the provisions of the Commission for the Blind Act; and
- h. publish an annual report on the activities and services of the Commission.

(8) AGENCY PROGRAM LISTING


Program Description:

Consistent with the federal Rehabilitation Act, the purpose of the Blind Services Program is to assist blind or visually impaired citizens of New Mexico to achieve appropriate employment and independent living outcomes.

Approved this 29th Day of August, 2019:



Arthur A. Schreiber
Chair
Commission for the Blind



Greg Trapp, J.D.
Executive Director
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