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Sent: Friday, January 15, 2021 12:16 PM
To: Marchi, Shirley <shirley.marchi@ood.ohio.gov>
Cc: Geoffrey Collver <collver@theohiocouncil.org>
Subject: Public Comment for OOD Council Meeting

To the OOD Council,

We would like to ask the Council to consider offering input and guidance on four rules being revised by OOD through the public rule-making process. OOD is holding a public hearing on these rules on February 2nd.

The OOD Council is charged with examining the impact of OOD's actions on the ability of individuals with disabilities to achieve employment outcomes through the program. It is also a body that represents a wide range of constituents and stakeholders for the VR program. We believe that your informed perspective, either as a Council or as individual members, would be especially helpful in guiding OOD's position on the proposed rules in question.

Background

OOD is currently moving through a process to revise four sections of the Ohio Administrative Code that pertain to the scope of VR services, eligibility for services, individual employment plans, and training programs ("the rules"). Our Associations are troubled by the proposed changes and have shared these concerns with senior OOD staff.

The proposed four rules remove basic information about the VR program and instead refer the reader to the Code of Federal Regulations. For example: in the current rule regarding scope of services, there is a list of services available to consumers such as work adjustment, job placement, job coaching, transportation, interpreter services and more. The proposed rule would remove the enumerated list of potential services and merely refer the reader to the Code of Federal Regulations. This change is not consumer friendly and does not promote transparency about OOD's services.

The Ohio Administrative Code is often the place where consumers and providers can learn about what services they are legally entitled to and how the program should work for them. The current version of the four rules being revised provide the reader with an understanding of who is eligible for services, what those services are and what they should expect from OOD. We believe Ohioans with disabilities who are seeking assistance from OOD should not have to research the Code of Federal Regulations to learn what services they are entitled to. The system is complicated enough, rules should contain useful information in plain language for every Ohioan.

We believe the OOD Council's experience and expertise could inform the direction of these rules as well as OOD's policies around its public rule-making process generally and we respectfully request the Council's participation in this process. Thank you for your consideration of this request.

With Kind Regards,

Emily Turner
Executive Director
Ohio Association of Goodwill Industries

AND

Geoff Collver
Associate Director
The Ohio Council of Behavioral Health Providers