

Separate Agency Best

From: Braille Monitor July 1999

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Separate Agency for the Blind: Best Practice for Success by James H. Omgig

From the Editor: Ever since Dr. Jernigan went to Iowa in 1958 to transform the worst agency serving blind people in the country into the best program anywhere, we have known how important it is for effective rehabilitation of the blind to be conducted by a separate agency. "Because separate agencies do a better job" is not a sufficient reason to give legislators being lured by the siren song of consolidation. Jim Omgig is one of the people whom Dr. Jernigan first rehabilitated and then trained to assist him to do his work in Iowa. Jim is a blind attorney who has now been involved in rehabilitation for more than thirty years. He wrote the following paper for several Arizona legislators some years ago. It is as relevant and helpful today as it was then.

Background

Every state has some form of vocational rehabilitation and training program for its blind adults, for which the federal government pays approximately eighty percent of the cost. The blind receive these services in one of two ways: either from a large general rehabilitation agency, which tries to serve people with all types of disabilities, or from a separate agency for the blind, which presumably has the requisite expertise and serves only blind consumers. Then in turn, if a separate program for the blind is established, it may be either a section or division within a much larger umbrella agency, or it may be a completely separate and independent agency, directly accountable to the governor, the legislature, the blind, and the general citizenry. It is up to each state to determine which governmental structure is best suited to meet the particular needs of its blind citizens.

Congress has recognized that the problems of the blind are unique and therefore that meaningful services for the blind are distinctly different from rehabilitation and related services for people with other disabilities. Accordingly, federal law permits the states to establish a completely separate, independent agency for the blind if they wish in order to address these unique needs in a comprehensive, specialized program. The relevant federal law is Title 29 USC, Section 701 (a) (1) (A) of the Rehabilitation Act of 1973, as amended.

Experience has shown that the blind always have the best possible chance of receiving quality services when such services are delivered through an independent, separate agency for the blind. There are numerous reasons for the tremendous success of these programs. They are outlined in the section below.

Why a Separate, Independent Agency for the Blind?

Rehabilitation of the blind has more in common with independent living services for the blind, services for the older blind, orientation and adjustment training for the blind, sight conservation, and sheltered employment for the blind than it does with rehabilitation of other disability groups or the socially or economically disadvantaged. Likewise small business enterprise programs for the blind have more in common with rehabilitation services for the blind than they do with other types of small business programs.

Even so, some argue that the blind should be lumped together with other disability groups or served through some giant umbrella agency to achieve integration and coordination of services. Until you think about it carefully and have certain facts presented to you, this might sound like pretty good, logical thinking.

There is, indeed, a need for coordination and integration of state services for the blind, but terminology should not be confused with reality. If, for instance, a state has a supervisor of highway construction, a supervisor of elementary education, a supervisor of pest control, and a supervisor of health and welfare, it does not follow that integration and coordination are achieved by creating a Department of Supervisors and lumping all of these people and functions together. Nor is any real integration or coordination achieved by establishing a Department of Health and Highways. Health is one function, highways another, and they cannot meaningfully be integrated.

If such a department is established, all that can be accomplished is to superimpose a costly administrative hierarchy upon the two departments. They will still remain separate functions whether they be called departments, divisions, sections, bureaus, or whatever. In fact the administrative hierarchy will be detrimental and will only cause inefficiency and waste in such a situation.

Relating all of this to the blind, fragmentation is increased rather than helped by putting all of the services for the blind into a division of a super-department. What is needed is common sense rather than textbook theory and neatness of somebody's organizational chart. Sound reasoning tells us that the various services for the blind complement and supplement one another and form one unique entity. They are only very slightly and incidentally related to services for people with other disabilities or other disadvantaged groups despite the similarity of terminology.

The people who administer rehabilitation and other services for the blind should be able to administer the entire package, and they should not be distracted by other duties. Furthermore, they should not be responsible to people who have other program interests and who may, therefore, subordinate the needs of programs for the blind to other interests or pet projects. At the same time the professional agency for the blind administrator must be responsible to some authority as a check and balance and a testing ground for his or her judgment. This authority should be a lay board, preferably one containing a number of blind people themselves--people who know firsthand what the services are and what they should be to achieve best results.

In those states where separate, independent agencies exist,

the governor (often with the advice and consent of the Senate) appoints the members of the lay board. The board hires the director, and the director then hires other staff and provides the leadership and day-to-day management of the program.

On the other hand, if the administrator of programs for the blind is responsible to the head of some super-agency or even directly to the governor, he or she is really not responsible to anyone, for these people are not knowledgeable about what is needed and are likely to be extremely busy with other matters. Thus an independent department or commission for the blind administering all state services for the blind is clearly best suited to meet the requirements for a good program.

It is, of course, possible to have an inefficient independent agency just as it is possible to have an inefficient program under any other type of structure, but the odds are much better for good programs if you have the independent agency system. This all depends, of course, upon the caliber and expertise of the people who do the administering. However, if all other things are equal, an independent commission affords the best organizational structure. Let me be more specific about what I have been saying. Even though the same words are sometimes used when we talk of various service programs, the mere use of such words is where the similarity ends. For example, rehabilitation of people using wheelchairs or of the deaf is in no sense the same process as rehabilitation of the blind. And this is equally true when discussing a hundred other types of rehabilitation. In other words, the problems facing blind people are unique. From this it naturally follows that those who are hired to provide rehabilitation services for blind people must possess a unique reservoir of knowledge specifically related to the problems of blindness, if effective programs are to be carried on. If we are to be truly effective, we need experts whose training and experience relate specifically to the problems of blindness. It is sheer nonsense to expect any human being to be knowledgeable about and to possess the necessary expertise to deal effectively with all of the problems of everyone needing various types of rehabilitation services.

"But," it is sometimes argued, "it is desirable to have the uniformity of administration found in a large super-agency." This argument might be made with considerable validity for producing license plates or for regulatory agencies--licensing, permits, etc. Its validity is much more doubtful, however, with respect to human-service programs, which for maximum efficiency must operate on a person-to-person basis. As I have said, neatness of somebody's organizational chart and uniformity of administrative pattern must not be permitted to obscure the human element. In fact, there is considerable evidence that bigness itself is a negative, not a positive factor.

"But," it is further argued, "programs for the blind and others which sound similar should be merged into large departments so that they will not function in a vacuum and be too independent." An interesting point can be made here. The best way to hide a tree is in a forest. A separate, independent agency for the blind with a lay board would always operate in the spotlight of inescapable scrutiny, accountability, and responsibility. If its programs are not functioning well, the blind can and will

rise in protest, and there can be no possibility of evasion, no shifting of responsibility, no passing the buck. There is no hierarchy of administrators, divisions, or bureaucrats to stand between unhappy blind consumers and the people employed to give them service.

On the other hand, if you want real independence and lack of accountability, turn that agency loose in the mazes of bureaucracy as a tiny segment of a super-agency. In the hide-and-seek of the intricacies and technicalities and divided responsibilities within a giant agency, no governor and no legislator can track it down. In the corridors of bureaucracy the full-time professional administrator is king, and the layman, whether governor, legislator, or average citizen just seeking service, is subject.

Establish a separate, independent agency for the blind with a lay board appointed by the governor and you have checks and balances and the maximum incentive for that agency to do a good job. Submerge services for the blind in a large department, and you give that program a blank check of independence and authority--independence and authority which it should neither want nor have.

Further, when you place services for the blind in a larger department of government, this will necessarily divert the energies and talents of administrators whose training, experience, and main professional concerns should be strictly with the blind. Can anyone really doubt what the main professional concerns of the high-level administrators of a giant, umbrella agency are? I can assure you that those concerns have nothing to do with blindness.

We who are blind do not wish to divert the energies or talents of anybody, nor do we wish the agency for the blind's energies and talents to be diverted, watered down, or shifted from the course of giving the best possible service to the blind of the state. This is probably one of the principal reasons why many states have separated their services for the blind from large departments.

"But," as a last-ditch effort, it is argued by the uninformed, "can't we save a lot of state and federal money if we just lump together these seemingly related programs? We can avoid duplication and save a bundle." While this sounds logical and responsible, the fact is that, where this re-organizing takes place, the same program administrators and managers are generally retained, but in addition a new and costly level of administrators is imposed to supervise the original program managers. This practice costs more, not less.

Finally, several years ago an independent study (The Mallas Report) was made of service delivery systems to determine which type was best suited to provide quality rehabilitation and related services for the blind. The study concluded that the separate, independent agency with a lay board appointed by the governor is best. In an interview the researcher said, "Where reorganization of services for the blind has taken place on the basis of the economy-of-scale principle, its proponents have sold the legislature and the Governor on statements such as, 'This will be more efficient and economical. It will let us get more mileage out of every tax dollar.' As a matter of fact, in every

state where such a reorganization has taken place, the prestige and level of operation of the agencies serving the blind have been downgraded." This study also makes another revealing finding. "In general programs for the blind which fall under rehabilitation departments and umbrella agencies have the least effectiveness in developing and utilizing necessary financial resources."

In conclusion, we who are blind want the opportunity to receive services aimed at returning us to the mainstream of life. We want to be taxpayers, not tax users. The separate, independent agency for the blind offers us the best chance for meaningful programs. We are willing to work, and work hard, but we will also dare to dream in order to develop and protect our separate programs.
