

**Note:** Upload completed document to the Electronic Rule Filing System.

Hearing Date: April 4, 2024

Today's Date: April 10, 2024

Agency: Opportunities for Ohioans with Disabilities

Rule Number(s): Ohio Adm.Code 3304-2-58

If no comments at the hearing, please check the box. ☒

List organizations or individuals giving or submitting testimony before, during or after the public hearing and indicate the rule number(s) in question.

**In-Person Comments:**

Individual(s)/Organization(s)	Rule	Comments
N/A		

**Written Comments:**

Individual(s)/Organization(s)	Rule	Comments
Christina Carnahan, University of Cincinnati	3304-2-58	Christina Carnahan, Director of the Intellectual and Developmental Disabilities Education Center with University of Cincinnati, suggests clarifying that Ohio Adm.Rule 3304-2-58 includes students with intellectual and developmental disabilities enrolled in Comprehensive Transition Programs (CTPs).
Katie Norland, University of Cincinnati	3304-2-58	Katie Norland, Director of Transition and Access Pathways with the University of Cincinnati, suggested that students in CTPs be explicitly declared as eligible within Ohio Adm.Code 3304-2-58 for the College to Careers and associated programming with Opportunities for Ohioans with Disabilities agency.
John Berninger	3304-2-58	John Berninger is the parent of an individual enrolled in the Transition and Access Pathways program with the University of Cincinnati. John Berninger suggests modifying Ohio Adm.Rule 3304-2-58 to clarify that CTP students are included as eligible for College to Careers and associated programming.
Kerstin Sjoberg, Disability Rights Ohio	3304-2-58	Executive Director of Disability Rights Ohio (DRO) suggested removal of the requirement that training lead to a "degree, certificate or other recognized educational credential" so that OOD can pay for CTPs, Transition Postsecondary Education Programs for Students with Intellectual Disability (TPSIDs), and other employment preparation programs for individuals with

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		disabilities offered at postsecondary institutions are covered by this rule. DRO also suggests amending the rule to remove “[t]o continue receiving OOD support, an individual with a disability participating in postsecondary training shall maintain a cumulative grade point average of 2.0 higher and the minimum grade requirements for successful completion of the academic program.” DRO notes that current language in Section (H) of Ohio Adm.Code 3304-2-58 does not allow support for CTPs, TPSIDs, and other employment preparation programs for individuals with disabilities offered at postsecondary institutions because they do not require students to maintain a cumulative grade point average.
Matthew & Maleshia Neagebauer	3304-2-58	Matthew and Maleshia Neugebauer are parents of an individual attending the Transition and Access Pathways program with the University of Cincinnati. Matthew and Maleshia suggests modifying Ohio Adm.Rule 3304-2-58 to clarify that CTP students are included as eligible for College to Careers and associated programming.
Erin Tenney, Mount Vernon Nazarene University	3304-2-58	Erin Tenney, Program Director of Mount Vernon Nazarene University’s IGNITE program suggests modifying Ohio Adm.Rule 3304-2-58 to clarify that CTP students are included as eligible for College to Careers and associated programming.
Jessie Green, Ohio State University	3304-2-58	Jessie Green is the Program Director for Transition Options in Postsecondary Settings program at the Ohio State University Nisonger Center. Jessie Green suggests modifying Ohio Adm.Rule 3304-2-58 to clarify that CTP students are included as eligible for College to Careers and associated programming.
Margo Izzo	3304-2-58	Margo Izzo, Program Director of Transition Services at the Ohio State University Nisonger Center, suggests modifying Ohio Adm.Rule 3304-2-58 to clarify that CTP students are included as eligible for College to Careers and associated programming.
Colin Schaffer	3304-2-58	Colin Schaffer is an individual attending the Transition Options in Postsecondary Settings program at the Ohio State University Nisonger Center. Colin Schaffer commented asking Opportunities for Ohioans with Disabilities agency to consider support of CTPs.
Amy Shuman	3304-2-58	Amy Shuman, parent of an individual who attended the Transition Options in Postsecondary Settings program at the Ohio State University Nisonger Center, commented asking Opportunities for Ohioans with Disabilities agency to consider support of CTPs.

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### **Consolidated Summary of Comments Received**

*Please review all comments received and complete a consolidated summary paragraph of the comments and indicate the rule number(s).*

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Ohio Adm.Code 3304-2-58: All comments received by Opportunities for Ohioans with Disabilities (OOD) concern supporting Comprehensive Transition and Postsecondary (CTP) programs. CTP programs are authorized under the Higher Education Opportunity Act. These programs are offered by institutions of higher education to support students with intellectual and developmental disabilities who want to continue academic, career, technical, and independent living instruction after high school. The comments request that Ohio Adm.Code 3304-2-58 explicitly support CTP programs.

### **Incorporated Comments into Rule(s)**

*Indicate how comments received during the hearing process were incorporated into the rule(s). If no comments were incorporated, explain why not.*

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<b>Comment Received</b>	<b>Rule</b>	<b>How Incorporated</b>
Christina Carnahan, University of Cincinnati	3304-2-58	Not incorporated, please see note below
Katie Norland, University of Cincinnati	3304-2-58	Not incorporated, please see note below
John Berninger	3304-2-58	Not incorporated, please see note below
Kerstin Sjoberg, Disability Rights Ohio	3304-2-58	Not incorporated, please see note below
Matthew & Maleshia Neagebauer	3304-2-58	Not incorporated, please see note below
Erin Tenney, Mount Vernon Nazarene University	3304-2-58	Not incorporated, please see note below
Jessie Green, Ohio State University	3304-2-58	Not incorporated, please see note below
Margo Izzo	3304-2-58	Not incorporated, please see note below
Colin Schaffer	3304-2-58	Not incorporated, please see note below
Amy Shuman	3304-2-58	Not incorporated, please see note below

### **Summary Response to the written public comments:**

Opportunities for Ohioans with Disabilities (OOD) appreciates the comments but will not be making the suggested changes due to the supports already made available by OOD to these students. OOD supports students participating in Comprehensive Transition Programs for Students with Intellectual Disabilities (CTPs), Transition Postsecondary Education Programs for Students with Intellectual Disability (TPSIDs), and other employment preparation programs for individuals with disabilities by providing services in accordance with OOD policies and procedures under OOD's Vocational Rehabilitation Fee Schedule (Ohio Adm.Code 3304-2-52, Appendix A). Students participating in CTP and TPSID programs who are pursuing industry recognized credentials are eligible for tuition support for their coursework, consistent with their Individualized Plan for Employment. OOD will continue to partner with Ohio's CTP and TPSID programs, and other employment preparation programs for individuals with disabilities to support the student's employment goals and to ensure access to vocational rehabilitation services.