



DRAFT
Areas of Focus
Fiscal Year 2026

Disability Rights Arizona (DRAZ) is the federally designated Protection and Advocacy System for the State of Arizona. DRAZ's mission is to assist Arizonans with disabilities to promote and protect their legal rights to independence, justice, and equality. Protection and Advocacy agencies throughout the United States work towards ensuring that the human and civil rights of persons with disabilities are protected. DRAZ represents individuals and classes of individuals in negotiations, administrative proceedings, alternative dispute resolution, and litigation. DRAZ develops and provides legal rights information, conducts outreach and training, and provides self-advocacy materials. DRAZ conducts monitoring and investigates allegations of abuse and neglect involving facilities serving people with disabilities.

The demand for free legal and advocacy services to address disability-related legal issues is far greater than DRAZ's resources. To make the most of the available resources, each year DRAZ develops areas of focus to serve individuals with disabilities who fit into specific federal program eligibility guidelines.

The below Focus Areas are subject to change and will be limited if the funding received by DRAZ is limited in FY 2026.

DRAZ considers the following factors in deciding whether it can provide legal and advocacy services:

Case Selection Factors that Apply to All Programs

1. Services depend upon the availability of DRAZ staff and resources, especially where DRAZ is pursuing systemic activities that require significant resources.
2. The prospective client must meet the program eligibility guidelines.

3. The legal problems must fall within an area of focus and objective for services.
4. DRAZ only provides legal services to address legal issues that:
 - a. relate to an individual's disability,
 - b. may be resolved by DRAZ's legal and advocacy staff, and
 - c. are supported by the facts and the law.
5. The matter does not fall primarily into any of the following practice areas: Bankruptcy, Criminal Law, Family Law, Consumer Law, Identity Theft, Malpractice, Mortgage Foreclosure, Personal Injury, Property, Social Security Eligibility Determination or Appeals, Court-Ordered Treatment (unless related to [abuse](#) or [neglect](#)), Appointment of Guardian or Conservator. DRAZ may consult with attorneys representing clients with disabilities about disability and disability discrimination issues that may arise in these cases.
6. Individuals whose legal problems present opportunities to address systemic and policy issues that will likely help a class of individuals with disabilities will receive priority for litigation or other types of systemic advocacy to address the gap in access to justice for as many as possible.
7. DRAZ generally does not provide legal and advocacy services to individuals who are represented by counsel or have engaged other advocates, except in cases where co-counseling arrangements are desirable for litigation or another systemic advocacy.
8. Individuals from under-resourced, underserved or unserved communities or geographic regions will receive priority for representation, outreach, and virtual or in-person training.
9. Individuals whose legal problems present opportunities to collaborate with other public interest legal and community organizations representing persons subjected to unlawful discrimination based on other characteristics.

Protection and Advocacy for Individuals with Mental Illness – PAIMI

The Protection and Advocacy for Individuals with Mental Illness (PAIMI) grant was established by Congress in 1986. PAIMI agencies, such as DRAZ, are mandated to protect and advocate for the rights of individuals with significant mental illness. The Substance Abuse and Mental Health Services Administration, Center for Mental Health Services oversees the PAIMI program.

The following PAIMI focus areas and objectives will be followed in accordance with our Case Selection Factors during FY 2026 (October 1, 2025 through September 30, 2026).

PAIMI FOCUS AREA #1:

Reduce incidences of abuse, neglect, and rights violations of individuals with significant mental illness residing in locked or unlocked facilities.

Description: Individuals with significant mental illness residing in locked or unlocked treatment facilities or other supportive residential treatment settings providing mental health services will be educated about their rights, and DRAZ will advocate for the rights of these individuals.

Objectives:

- 1.1 Conduct at least two (2) investigations into allegations of the abuse or neglect of Arizonans with significant mental illness in nursing facilities and when appropriate, make recommendations for corrective action, preventative measures, and policy modifications through letters of concern and/or public reports. Within this objective, DRAZ will give priority to cases in which there are systemic problems that may result in additional incidents if uncorrected. DRAZ will also work on concluding ongoing investigations relating to facilities serving people with significant mental illness.

- 1.2 Conduct at least eight (8) in-person or virtual monitoring visits to the Arizona State Hospital, and at least eight (8) monitoring visits of nursing facilities, with three (3) of these in-person or virtual monitoring visits conducted in underserved or rural areas.
- 1.3 Continue to participate in the class action lawsuit *Jensen v. Thornell*, including, but not limited to, representing DRAZ in monitoring visits, briefing, and hearings, as necessary related the Court's Order and Permanent Injunction in this case concerning individuals with significant mental illness incarcerated in Arizona's state-operated prisons.
- 1.4 Provide timely and accurate rights information to individuals with significant mental illness about how to effectively self-advocate, and revise or create self-advocacy materials as needed.

PAIMI FOCUS AREA #2:

Ensure an adequate network of appropriate mental health care services for individuals with significant mental illness at risk of institutionalization.

Description: Individuals with significant mental illness at risk of institutionalization may be eligible for community-based services that permit an individual to address their mental health needs, obtain or maintain a stable living situation, and enjoy independence.

Objectives:

- 2.1 Provide legal consultations, and undertake research and systemic advocacy to address chronic problems in provision of behavioral health services in Arizona for people with serious mental illness.
- 2.2 Provide timely and accurate rights information to individuals with significant mental illness regarding filing appeals, grievances, and quality of care complaints, court-ordered evaluation and treatment, eligibility for SMI designation, and/or obtaining second

opinions, and revise or create self-advocacy materials as needed.

- 2.3 Conduct at least two (2) in-person or virtual outreach or training events for individuals with significant mental illness, families, and other affected groups.

PAIMI FOCUS AREA #3:

Assist individuals with significant mental illness living in the community to understand their right to be free from discrimination in employment, education, housing, and public services and accommodations, and to take steps to secure those rights.

Description: Individuals with significant mental illness have the right to be free from disability discrimination in employment, housing, and public entities and accommodations.

Objectives:

- 3.1 Provide legal consultations, direct legal and advocacy services, and/or systemic advocacy, in matters involving an individual with significant mental illness who has experienced discrimination in any of the following areas:
 - Failure to provide a reasonable accommodation in employment or other discriminatory employment practices.
 - Failure of a public entity or public accommodation to provide reasonable modifications to rules and policies, including but not limited to modifications for service animals.
 - Discriminatory housing practices, including denial of reasonable accommodations and modifications, that prevent or burden people with significant mental illness from living in the housing of their choice.
- 3.2 Provide timely and accurate disability rights information on employment, housing, education, and public services and accommodations to provide individuals with significant mental

illness the tools to secure their rights, and revise or create self-advocacy materials as needed.

- 3.3 Conduct at least two (2) in-person or virtual outreach or training events for individuals with significant mental illness, families, and other affected groups.

Protection and Advocacy for Persons with Developmental Disabilities – PADD

The Developmental Disabilities Assistance and Bill of Rights Act of 1975 created the Protection and Advocacy for Persons with Developmental Disabilities (PADD) program. As a PADD program, DRAZ must take legal, administrative, and other appropriate actions to protect and advocate for the rights of individuals living with developmental disabilities under federal and state laws. The U.S. Department of Health and Human Services Administration, Administration for Community Living oversees the PADD program.

The following PADD focus areas and objectives will be followed in accordance with our Case Selection Factors during FY 2026 (October 1, 2025 through September 30, 2026).

PADD FOCUS AREA #1:

Ensure that individuals with developmental disabilities are free from abuse and neglect and have appropriate safeguards to ensure their legal rights are protected.

Objectives:

- 1.1 Conduct investigations of alleged abuse or neglect related to incidents of suspicious death, restraint and seclusion, and physical or sexual assault of Arizonans with developmental disabilities in nursing facilities, and when appropriate, make recommendations for corrective action, preventive measures, and policy modifications through letters of concern and/or public reports. Within this objective, DRAZ will give priority to cases in which there are systemic problems that may result in additional incidents if uncorrected. DRAZ will also work on concluding ongoing investigations relating to facilities serving people with developmental disabilities.
- 1.2 Utilize a monitoring protocol to conduct in-person or virtual monitoring visits of at least five (5) select nursing facilities.

- 1.3 Provide timely and accurate rights information about reporting abuse and neglect to responsible agencies, and in-person or virtual legal rights training sessions, and revise or create self-advocacy materials as needed.

PADD FOCUS AREA #2:

Ensure an adequate network of appropriate healthcare services for individuals with developmental disabilities who are Medicaid or Medicare beneficiaries, and increase access by individuals with developmental disabilities who are Medicaid or Medicare beneficiaries to medical services, programs, and facilities.

Objectives:

- 2.1 Provide legal consultations, and undertake research and systemic advocacy to address chronic problems in provision of healthcare services in Arizona for people with developmental disabilities.
- 2.2 Provide timely and accurate rights information on healthcare services to provide individuals the tools to secure their rights, and in-person or virtual legal rights training sessions, and revise or create self-advocacy materials as needed.

PADD FOCUS AREA #3:

Assist individuals with developmental disabilities to understand their right to be free from discrimination in employment, housing, public services and accommodations, and voting, and to take steps to secure those rights.

Objectives:

- 3.1 Provide legal consultations, direct legal and advocacy services, and/or undertake systemic advocacy, in matters involving individuals with developmental disabilities who have experienced

discrimination in any of the following areas:

- Failure to provide a reasonable accommodation in employment, or other discriminatory employment practices.
- Failure of a public entity or public accommodation to provide reasonable modifications to rules and policies, including but not limited to modifications for service animals and/or auxiliary aids and services, such as ASL interpreters or braille copies, or other discriminatory practices.
- Discriminatory housing practices, including the denial of reasonable accommodations and modifications, that burden or prevent people with developmental disabilities from living in the housing of their choice.

- 3.2 Provide timely and accurate disability rights information on employment, housing, public services and accommodations, and voting to provide individuals the tools to secure their rights, and in-person or virtual legal rights training sessions, and revise or create self-advocacy materials as needed.

PADD FOCUS AREA #4:

Ensure that students with developmental disabilities have access to appropriate special education services under the Individuals with Disabilities Education Act (IDEA) and Section 504 of the Rehabilitation Act.

Objectives:

- 4.1 Provide legal consultations and individual advocacy to students who have been deprived a free appropriate public education (FAPE) due to any of the following:
- Failure to identify the student as a child who needs special education, particularly when the student is at risk of being denied appropriate accommodations, placement, and services, or is at risk of long-term discipline or removal.
 - Failure to implement special education and related services,

particularly when the failure is due to arbitrary limitations on models of delivery of services, staffing, or policy.

- Lack of appropriate and comprehensive transition services and premature graduation or discrimination in awarding high school diplomas.
- Denial of FAPE due to inappropriate or excessive discipline, restraint or seclusion, or other removal from the educational environment because of disability-related behaviors.

4.2 Represent or assist students with developmental disabilities or their special education parents in filing and/or resolving administrative complaints with appropriate administrative agencies, concerning substantive violations by any educational agency.

4.3 Engage in activities to systemically advocate for students with developmental disabilities, including: drafting amicus briefs; monitoring proposed state legislation, Department of Education and other relevant state agency guidance, and relevant proposed rule changes to the Arizona Administrative Code and court rules of proceeding; providing written comments and/or feedback as necessary to educate the Department, other state agencies, and policymakers about the effects of such changes. Collaborate with organizations focused on student rights to educate Arizona policy makers on issues impacting students with disabilities.

4.4 Provide timely and accurate rights information on special education to provide individuals with the tools to secure their rights, and in-person or virtual legal rights training sessions, and revise or create self-advocacy materials as needed.

PADD FOCUS AREA #5:

Collaborate with the DD Network (Developmental Disabilities Planning Council (DDPC), the Sonoran University Center of Excellence in Developmental Disabilities (UCEDD) and the Northern Arizona University Institute for Human Development (IHD)), and engage in collaborative outreach and systemic advocacy with entities and

organizations in the community serving individuals with developmental disabilities.

Objectives:

- 5.1 Participate on DD related Councils, and on the Advisory Councils for the DDPC, the Sonoran UCEDD, and IHD. Participate on the Arizona Developmental Disabilities Advisory Council (DDAC).
- 5.2 Collaborate with the DD Network and stakeholders on state and federal public policy issues impacting children and adults with developmental disabilities, and educating policymakers on these issues.
- 5.3 Collaborate with the DD Network and organizations serving individuals with developmental disabilities on activities related to outreach and advocacy in underserved communities, including, but not limited to, an annual disability conference.
- 5.4 Collaborate with the DD Network and organizations serving individuals with developmental disabilities on activities related to outreach and education concerning supported decision-making and alternatives to guardianship in Arizona.

Protection and Advocacy for Individual Rights – PAIR

In 1993, Congress established the Protection and Advocacy for Individual Rights (PAIR) program. PAIR is a federal program under the Rehabilitation Act of 1993. As a PAIR agency, DRAZ must protect and advocate for the legal and human rights of people with disabilities who do not meet the eligibility criteria for the following grants:

- the Protection and Advocacy for Persons with Developmental Disabilities (PADD),
- the Protection and Advocacy for Individuals with Mental Illness (PAIMI), and
- the Client Assistance Program (CAP).

The Office of Special Education and Rehabilitative Services (OSERS), Rehabilitation Services Administration oversees the federal PAIR program.

The following PAIR focus areas and objectives will be followed in accordance with our Case Selection Factors during FY 2026 (October 1, 2025 through September 30, 2026).

PAIR FOCUS AREA #1:

Ensure that individuals with disabilities (who do not meet the criteria for developmental disability or mental illness) are free from abuse and neglect and have appropriate safeguards to ensure their legal rights are protected.

Description: Individuals with disabilities residing in facilities or other supportive residential settings will be educated about their rights to be free from abuse and neglect, and DRAZ will advocate for the rights of these individuals.

Objectives:

- 1.1 Conduct investigations of alleged abuse or neglect related to incidents of suspicious death, restraint and seclusion, and physical or sexual assault of Arizonans with disabilities in nursing facilities, and when appropriate, make recommendations for corrective action, preventive measures, and policy modifications through letters of concern and/or public reports. Within this objective, DRAZ will give priority to cases in which there are systemic problems that may result in additional incidents if uncorrected.
- 1.2 Utilize a monitoring protocol to conduct monitoring visits at nursing facilities.
- 1.3 Provide timely and accurate information about reporting abuse and neglect to responsible agencies, and in-person and virtual legal rights training sessions, and revise or create self-advocacy materials as needed.

PAIR FOCUS AREA #2:

Ensure an adequate network of appropriate healthcare services for individuals with disabilities who are Medicaid or Medicare beneficiaries, and increase access by individuals with disabilities who are Medicaid or Medicare beneficiaries to medical services, programs, and facilities.

Description: For many individuals with disabilities, access to healthcare services is often the key to living independently at home and in their communities. Often, healthcare facilities deny the healthcare services necessary for individuals with disabilities to be as healthy as possible. Individuals with disabilities encounter physical barriers, and the denial of reasonable modifications and auxiliary aids and services needed to participate fully in healthcare decisions and live as independently as possible.

Objectives:

- 2.1 Provide legal consultations, and undertake research and systemic advocacy to address chronic problems in provision of healthcare services in Arizona for people with disabilities.
- 2.2 Provide timely and accurate rights information on healthcare services to provide individuals the tools to secure their rights, and in-person or virtual legal rights training sessions, and revise or create self-advocacy materials as needed.

PAIR FOCUS AREA #3:

Assist individuals with disabilities (who do not qualify as a person with a developmental disability or mental illness) living in the community to know their right to be free from discrimination in employment, housing, public services and accommodations, and voting, and to take steps to

secure those rights.

Description: Individuals with disabilities have the right to be free from disability discrimination in employment, housing, public services and accommodations, and voting.

Objectives:

- 3.1 Provide legal consultations, direct legal or advocacy services, and/or undertake systemic advocacy, in matters involving an individual with disabilities who has experienced discrimination in any of the following areas:
 - Failure of employers to provide a reasonable accommodation in employment, or other discriminatory employment practices.
 - Failure of a public entity or public accommodation to provide reasonable modifications to rules and policies, including but not limited to the modifications for service animals and/or auxiliary aids and services, and voting access.
 - Discriminatory housing practices, including the denial of reasonable accommodations and modifications, that prevent or burden people with disabilities from living in the housing of their choice.
- 3.2 Provide timely and accurate disability rights information on employment, housing, public services and accommodations, and voting to provide individuals the tools to secure their rights, and in-person or virtual legal rights training sessions, and revise or create self-advocacy materials as needed.

Other Federal Grant Programs

The following focus areas and objectives will be followed in accordance with our Case Selection Factors during FY 2026 (October 1, 2025 through September 30, 2026) for the following grants:

Client Assistance Program – CAP

The Client Assistance Program (CAP) is authorized under the 1984 Amendments to the Rehabilitation Act of 1973. CAP ensures that Arizona's Vocational Rehabilitation (VR) Program assists individuals with disabilities to receive the services they require to become successfully employed. CAP services include referral services, creation and dissemination of self-advocacy materials, direct advocacy services, representation in the appeal process, such as administrative reviews, mediation, fair hearings and reconsideration requests, and systems advocacy.

CAP FOCUS AREA #1:

Assist clients and applicants of the Arizona's Vocational Rehabilitation (VR) Program and other Rehabilitation Services Administration Programs in addressing conflicts relating to eligibility, denial, or unreasonable delay of necessary VR services for successful employment.

Objectives:

- 1.1 Provide technical assistance, direct representation, and engage in systemic advocacy to address conflicts relating to eligibility, denial, or unreasonable delay of necessary VR services for successful employment based on:
 - arbitrary or absolute limitations on services;
 - failure to make exceptions to policies based on individual rehabilitation needs and disability-related needs;
 - unlawful state policies in conflict with federal law;

- inadequate VR services for self-employment, customized employment, and supported employment;
- relegation of clients to employment outcomes that do not reflect their interests, capabilities, and preferences;
- discrimination in services by state VR vendors; and/or
- staffing issues, lack of training, or lack of contract providers.

Protection and Advocacy for Assistive Technology – PAAT

Protection and Advocacy for Assistive Technology (PAAT) was reauthorized as part of the Assistive Technology Act of 2004. DRAZ's PAAT work focuses on information and referral services, short-term and technical assistance, and individual representation to ensure children and adults with disabilities live more productive and independent lives.

PAAT FOCUS AREA #1:

Ensure that children and adults with disabilities can get access to critically needed assistive technology in a variety of settings – at school, home, work, and in the community.

Objectives:

- 1.1 Provide individual representation and/or systemic advocacy to ensure that children and adults with disabilities can get access to critically needed assistive technology in a variety of settings, including at school, home, work, and in the community.

Protection and Advocacy for Beneficiaries of Social Security – PABSS

Protection and Advocacy for Beneficiaries of Social Security (PABSS) services are authorized under the Ticket to Work and Work Incentives Improvement Act of 1999. DRAZ's PABSS program provides information and referral, education, and in-person and virtual training, technical assistance, and individual representation to Social Security Disability Insurance (SSDI)

beneficiaries and Supplemental Security Income (SSI) recipients who are experiencing barriers to employment.

PABSS FOCUS AREA #1:

Assist individuals who receive SSDI or SSI to address a barrier to employment. Barriers to employment include 1) disability-related employment discrimination, 2) failure to provide or implement appropriate Vocational Rehabilitation services through the Arizona Rehabilitation Services Administration or Employment Networks, 3) discrimination in housing, transportation, post-secondary education, or 4) denial of necessary Assistive Technology or medically necessary services through AHCCCS, ALTCS, or Medicare.

Objectives:

1.1 PABSS Services

**Protection and Advocacy for Individuals with
Traumatic Brain Injury – PATBI**

The Protection and Advocacy for Individuals with Traumatic Brain Injury (PATBI) program was created by Congress as part of the Children's Health Act of 2000. DRAZ's PATBI work focuses on self-advocacy information, short-term and technical assistance, and individual representation to advocate on an individual and systemic level to effect changes in systems providing care and services for persons with TBI.

PATBI FOCUS AREA #1:

Ensure that persons with TBI and their family members are educated about their rights, can get access to self-advocacy information on their rights, and can enforce those rights.

Objectives:

1.1 PATBI Services

- Provide individual representation and/or systemic advocacy concerning persons with TBI on disability-related legal matters including healthcare, housing, employment and related services, and access to public entities and public accommodations;
- Collaborate with community partners to provide self-advocacy information and training to persons with TBI and their families.

Protection and Advocacy for Voting Assistance – PAVA

The Protection and Advocacy for Voting Assistance (PAVA) program was created in 2002 when Congress passed the Help America Vote Act to ensure that persons with disabilities can cast a private and independent vote. DRAZ's PAVA work focuses on ensuring that people with disabilities have equal access to all aspects of the electoral process.

PAVA FOCUS AREA #1:

Ensuring full access to the electoral process for persons with disabilities in registering to vote, casting a vote, and accessing a polling place.

Objectives:

1.1 PAVA Services

- Increase voter registration for Arizonans with disabilities;
- Increase voter participation (e.g., casting a ballot) for Arizonans with disabilities;
- Increase voter education opportunities for Arizonans with disabilities;
- Work with election officials to address the electoral needs of Arizonans with disabilities; and
- Protect the rights of Arizonans with disabilities to ensure full

access to the electoral process.

- 1.2 Educating the public on voting under guardianship in Arizona and advocating for changes consistent with *In re: Wood*.