# PART C, CHAPTER 6.5.a:ORIENTATION AND MOBILITY (O&M)BVI-PROVIDED SERVICES

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| **Policy Number** | **Authority** | **Scope**  | **Effective Date** |
| Part C, Chapter 6.5.a | 34 CFR [§361.48(b)(11)](https://www.ecfr.gov/current/title-34/part-361#p-361.48(b)(11)), and Human Resources Code [§91.002(2)](https://statutes.capitol.texas.gov/Docs/HR/htm/HR.91.htm) | All TWC-VR staff, particularly BVI VR Counselors | 9/3/2024 |

## PURPOSE

In accordance with the authority (Federal and State) listed above, this policy is issued by the Texas Workforce Commission Vocational Rehabilitation Division (TWC-VR). Adherence to these rules and regulations issued under the Rehabilitation Act of 1973, as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA), supports Texans with disabilities in gaining, maintaining, and advancing in competitive integrated employment (CIE).

Specifically, the purpose of this policy and these procedures is to ensure adherence to the provision of Orientation and Mobility services for TWC-VR customers who are blind or visually impaired, who need training in safely and effectively navigating different environments.

## DEFINITIONS

Blind: An individual with visual acuity with best correction of 20/200 or less in the better eye; a visual field of 20 degrees or less; or a combination of both.

Informed Choice: The means by which a customer chooses their rehabilitation path, from options based on their needs and circumstances and the TWC-VR rules, as it relates to choosing orientation and mobility services and the providers of those services.

Low Vision: A visual acuity with best correction of 20/70 or less in the better eye; a visual field of 30 degrees or less in the better eye; or a combination of both.

Mobility: Moving in the environment using tools for travel assistance.

Orientation: Using senses to understand one’s position and relationship to the environment.

Significant Visual Impairment:A disease or condition of the eye that does not meet the definitions of Blind or Low Vision but does create a significant impediment to employment and cannot be corrected with glasses or contact lenses.

White Cane: A long, rigid, non-folding, fiberglass white cane with a metal tip used in Orientation and Mobility (O&M) services.

## POLICY

### General Overview

O&M services assist blind or visually impaired customers to become confident and independent travelers. These services teach skills for safe travel indoors and outdoors, aiding integration into work and community.

TWC-VR provides (i.e., in-house services) both O&M Instructors and contracted O&M Instructors. O&M services include evaluation and training.

* Evaluation: An O&M evaluation identifies potential training needs.
	+ Referral: A VR Counselor refers BVI customers whose ability to travel safely and independently is affected by blindness, low vison, or significant visual impairment. A VR Counselor must—
		- Refer customers with a visual acuity of 20/200 or less in the better eye; a visual field of 20 degrees or less; or a combination of both with best correction (blind) for O&M evaluation; or
		- Document why a customer is not referred (e.g., recent completion of O&M training, experienced cane traveler).
	+ Assessment Report: The assessment report includes evaluation results and makes recommendations for O&M services (e.g., recommended training hours, locations for training, techniques).
* Training: O&M training addresses customer travel skill deficits so the customer can travel safely and effectively using a white cane. O&M hours are based on the recommendations in the Assessment Report and can be adjusted during training to meet individual customer needs. The O&M specialist updates the VR Counselor regularly and at training completion with the following reports:
	+ Monthly Training Report: The regional in-house O&M Specialist posts regular training updates in ReHabWorks (RHW).
	+ Summary Report: The regional in-house O&M specialist posts the customer’s completion of O&M training in RHW.

### Standards for Providers (SFP)

The SFP manual focuses on the business practices, processes, and policies that TWC-VR and the contracted provider must follow. This VRSM chapter includes services that are provided by a contractor. For additional information regarding contractor responsibilities, service descriptions and costs, please refer to the SFP Chapter 5: Orientation and Mobility.

### Additional Policy Considerations

* Comparable Services and Benefits: O&M services are exempt from the requirement to secure comparable services and benefits prior to TWC-VR expending funds.
* Customer Participation in the Cost of Services: O&M services are exempt from applying Basic Living Requirements (BLR) and, therefore, the customer is not required to participate in the cost of services.
* Recipients of Social Security Disability Benefits: Recipients of Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI), due to the customer’s disability, are exempt from the requirement to participate in the cost of TWC-VR services regardless of income.
* Exceptions to Policy: When necessary to meet the VR needs of a customer, TWC-VR staff members may request exceptions to policies and procedures through their chain of management up to the Deputy Division Director of Field Services Delivery, or designee. However, exceptions to policies and procedures based on Federal and State laws, statutes, and rules or regulations are not allowable.

## PROCEDURES

### Role of the O&M Instructor

O&M skills are crucial for customers who are blind or visually impaired to succeed in employment. Both the VR Counselor and the O&M Instructor encourage customers who struggle with efficient travel to learn O&M skills.

O&M instructors teach independent travel skills using a white cane, with the customer learning non-visually, developing safe and confident travel skills regardless of visual information. Rarely, an aluminum cane might be needed, justified, and documented in a case note. At the O&M Instructor’s discretion, the customer can use remaining vision during training if helpful, usually after the customer learns non-visual skills. O&M instructors teach—

* White cane skills;
* Compass directions;
* Stairs;
* Indoor self-familiarization;
* Auditory skills;
* Travel in various settings such as grocery stores, malls, airports, and rural areas, sidewalks, small business areas, and downtown areas;
* Problem-solving for travel challenges;
* Independent travel and transportation; and
* Nighttime travel.

O&M Instructors collaborate with customers, their support network, TWC-VR staff, educators, and community providers to ensure effective training and support.

### IPE Requirements

The VR Counselor must include O&M services on the customer's Individualized Plan for Employment (IPE) or IPE amendment before training starts.

The O&M Instructor works closely with the VR Counselor throughout the VR process, including—

* Sharing emotional and skill-related information with the VR Counselor;
* Assisting with employer contacts and job-travel analysis;
* Training nonvisual skills for job travel; and
* Teaching transferable skills for new environments.

### O&M Instructor and VR Counselor Staffing Sessions

Staffing sessions are held to—

* Develop a team approach for services with each customer;
* Provide regular communication between the O&M instructor and VR Counselor during O&M services; and
* Ensure comprehensive and timely O&M services.

Staffing sessions focus on—

* Cases chosen by the O&M Instructor and VR Counselor;
* Customer training progress;
* Immediate customer issues; and
* Changes to the O&M instructor's plan or the customer's IPE.

### O&M Referral Process

If a customer requires O&M services, the VR Counselor must refer the customer to the TWC-VR in-house O&M Instructor or a contracted O&M Instructor.

* Blind: Customers must be referred for assessment, unless there is pending eye surgery, or the customer recently completed training at the Criss Cole Rehabilitation Center (CCRC).
* Visually impaired: Customers with severe functional capacity limitations may also be referred for O&M services.

Customers demonstrating immediate critical needs before surgery may be referred to the O&M Instructor, depending on availability.

The VR Counselor must make a referral to an O&M Instructor by creating a service record in RHW.

### O&M Assessment Report

The O&M assessment provides critical information to the VR Counselor and customer to develop the customer's IPE or IPE amendment. It helps identify training needs and the potential training duration. A white cane and blindfold may be used for the assessment.

The O&M assessment focuses on skills for independent living and employment.

O&M instructors evaluate all aspects of the customers’ ability to travel and navigate their environment.

After the assessment, the in-house O&M Instructor creates a case note to include the assessment report results.

The O&M assessment report must include the following information:

* Customer's current travel-level;
* Specific travel skills needs;
* Summary of independent travel abilities;
* Assessment dates; and
* Recommended training hours.

The O&M instructor, in coordination with the VR Counselor and customer, determines when training should begin, following the completed assessment.

### Assessment Focus and Employment Outcome

While the O&M Instructor does not determine the customer's employment goal, the O&M instructor's assessment aims for independent functional travel as the ideal goal, critical in various employment settings.

If the assessment occurs before an employment goal is included in the IPE, the assessment focuses on independent functional travel skills applicable to employment.

### O&M Training Process

Based on the assessment results, the customer’s employment goal, and in collaboration with the VR Counselor and customer, the order of training services varies, but must include—

* Training in the use of nonvisual skills;
* Employment assistance for independent functional travel needs;
* Adaptive supplies for travel, such as a white cane and blindfold; and
* Use of problem-solving skills for customers to build confidence in travel and realize an opportunity for independence.

### O&M Services Monthly Progress Report

O&M instructors must enter monthly progress reports into RHW. The monthly progress report must include, at minimum, the following:

* Customer's progress report;
* Number of hours spent with the customer;
* Training dates;
* Recommendations for next steps; and
* Any issues or concerns with training, or changes in initial recommendations.

### Additional Services after Service-Record Closure

If additional services are needed after the service record is closed, a new service record is required.

The VR Counselor must specify what O&M skills are needed. If services last more than 30 days, the O&M Instructor must provide a monthly progress report using the "O&M" drop-down and entering "Summary Report" in the Add to Topic line until the additional services are completed.

When the additional services are completed, the O&M Instructor will close the service record when the O&M instructor and VR Counselor agree that no further services are needed.

### Recommending Purchase of Equipment

The O&M Instructor may recommend the VR Counselor purchase equipment that is not available or recommend a purchase by—

* Creating a service record in RHW for the items; and
* Delegating the purchase to the VR Counselor.

The O&M Instructor must discuss the purchase with the VR Counselor before completing the purchase.

All purchases of equipment must be included in an IPE or IPE amendment.

## APPROVALS & CONSULTATIONS

There are no approvals or consultations for this policy and these procedures.

## REVIEW

The Policy Planning and Statewide Initiatives Team, or designee, is responsible for reviewing this policy and these procedures and will update the Document History log if necessary.

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| **Date** | **Type** | **Change Description** |
| 9/3/2024 | New | VRSM Policy and Procedure Rewrite |