# PART C, CHAPTER 6.5.b:ORIENTATION AND MOBILITY (O&M)CONTRACTED SERVICES

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| **Policy Number** | **Authority** | **Scope**  | **Effective Date** |
| Part C, Chapter 6.5.b | 34 CFR [§361.48(b)(11)](https://www.ecfr.gov/current/title-34/part-361#p-361.48(b)(12)), and TWC Rule [§91.002(2)](https://texreg.sos.state.tx.us/public/readtac%24ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=40&pt=20&ch=856&rl=49) | All TWC-VR staff | 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

Bilateral Contractor: A service contractor that agrees to specific duties or deliverables under the terms of a contract with TWC-VR.

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.

Orientation: The process of using the available senses to establish one's position and relationship within the environment.

Mobility: The ability to travel in the environment with the help of an established tool (including white canes, dog guides, and electronic travel aids).

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

Contracted Orientation and Mobility (O&M) services are interrelated services designed to develop independent travel skills in individuals who are blind or visually impaired. O&M specialists offer complex, interrelated services designed to develop independent travel skills in individuals who are blind or visually impaired.

### Contracted O&M Parameters

O&M services begin with an assessment and can include training held in environments frequently visited by the customer in their home or community. Based on the results of the assessment, the VR Counselor or Older Individuals who are Blind (OIB) Worker determines the training goal and hours to be funded by TWC-VR or OIB.

* O&M services not provided by TWC-VR staff are purchased from a bilateral contractor.
* O&M assessments and training cannot be provided remotely.
* O&M assessments include an evaluation of the customer's O&M skills in multiple situations and may be conducted using the customer's functional vision.
* O&M lessons must be at least two hours long; however, the O&M specialist cannot conduct more than six hours of training in a day, even if multiple customers are served during that day.
* All O&M evaluation and training services for TWC-VR customers are conducted using—
	+ Nonvisual (blindfold) techniques; and
	+ A rigid (non-folding) white cane with a metal tip.
* All O&M evaluation and training services for OIB customers are conducted using—
	+ Either nonvisual (blindfold) or visual training, whichever better addresses the customer's needs and circumstances; and
	+ A rigid (non-folding) white cane with a metal tip, unless an alternate cane is needed.
* O&M training with a guide dog must not exceed more than four hours and must be preapproved in writing by the VR Counselor or OIB Worker.
* For customers in the Independent Living Services for Older Individuals Who Are Blind (ILS-OIB) program, the OIB Worker authorizes no more than three hours for the initial O&M assessment to be completed.
* For ILS-OIB program customers, the length of the O&M training lesson will be determined by the customer’s health, stamina, and ability to participate. If less than two hours of O&M training were provided in one session, the trainer must document on *Orientation and Mobility Training (VR2896)* in the Brief Description section how the training lesson affected the customer’s health, stamina, and ability to participate.

### Standards for Providers Manual (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 Services.

### 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 customers 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 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

### Determining the Need for Contracted O&M

The VR Counselor or OIB Worker and the customer may determine that O&M training services are necessary for blind or visually impaired (BVI) customers who do not travel efficiently and effectively.

### Referral and Service Provision

When the VR Counselor or OIB Worker, and customer agree to the receipt of Contracted O&M services, it must be included in the Individualized Plan for Employment (IPE).

The VR Counselor or OIB Worker must—

* Complete the *Orientation and Mobility Referral (VR2897)*;
* Provide documentation (only when relevant), such as medical or psychological reports, case notes, vocational testing, or employment data collected by TWC-VR staff;
* Ensure TWC-VR staff send the service authorization (SA) and *VR2897*;
* Review the *Orientation and Mobility Assessment (VR2894)* with the contractor to determine the O&M specialist’s recommendations for training, if any, and approve;
* Provide any needed instruction or intervention necessary to foster the customer's success;
* Authorize O&M training for the customer;
* Approve group training in writing, if applicable;
* Purchase one rigid, long white cane with a metal tip and blindfold for each customer who is approved to receive O&M training;
* Review and approve the *Customer Services Report: Orientation & Mobility (O&M) Training (VR2896)*; and
* Ensure that the invoices are paid.

The contractor must—

* For O&M assessment—
	+ Document the information required on the *VR2894*, including—
		- The O&M specialist’s observations and comments;
		- Recommendations for O&M skills training;
		- The number of O&M training hours recommended for each area of training and the total number of training hours recommended;
		- The anticipated beginning and ending dates for the recommended training;
		- The customer’s response to the O&M training recommendations;
		- The height of the white cane that is most appropriate for the customer (using the measurement between the customer’s chin and nose when the customer is standing up); and
		- A description of all travel aids that the customer uses or would benefit from using.
* For O&M training—
	+ Document the information required on the *VR2896* for each customer’s monthly training progress, including—
		- The number of O&M training hours provided in each training area;
		- A detailed narrative on each skill area addressed during the reporting period and the O&M training location for each location;
		- A detailed explanation of anticipated O&M training for upcoming month;
		- An explanation of deviations from assessment recommendations, if any;
		- A detailed narrative of cumulative progress if O&M training is complete.

### Customer's Satisfaction

The customer's satisfaction and service delivery are verified by the VR Counselor, OIB Worker, or a TWC-VR staff member’s contact with the customer and documented in a case note.

### O&M Payment

Payment for O&M services is made to the contractor when the VR Counselor approves a complete, accurate, signed, and dated—

* For O&M assessment—
	+ *VR2894*; and
	+ The invoice.
* For O&M training:
	+ *VR2896*; and
	+ The invoice.

Monthly progress reports, along with the invoice and any other required supporting documentation, must be submitted within 30 days from the end of each calendar month until the customer's O&M services are completed, or services are no longer authorized by the customer's VR Counselor or OIB Worker.

## APPROVALS & CONSULTATIONS

TWC-VR staff must follow the following approvals and consultations:

* *VR Director approval is required for any request to change Contracted Orientation and Mobility policy and procedures, using the Contracted Service Modification Request form (VR3472) prior to changes being implemented.*

## 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.

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