

AER Ohio Position Paper

Orientation and Mobility (O&M): Essential Service

November 28, 2020

It is the position of the Association for the Education and Rehabilitation of the Blind and Visually Impaired of Ohio (AERO) that the rehabilitation practice of orientation and mobility (O&M) is recognized as an **essential service** within the State of Ohio. As an **essential service**, rehabilitation providers who work with individuals who are blind and visually impaired in the area of O&M will be permitted to provide in-person services during times of crisis.

Background of O&M Services for Individuals who are Blind and Visually Impaired

The U.S. Federal Government has long recognized the importance of rehabilitation services for individuals who are blind and visually impaired. Specifically, the field of **orientation and mobility (O&M)** was recognized on a federal level in 1945 when the Surgeon General's office dispatched Warren Bledsoe, an orientor, from Valley Forge Army General Hospital to Dibble Army General Hospital to instruct on the use of the white cane to wounded American Veterans. This act led to the opening of the Veterans Administration (VA) Hines Rehabilitation Center for Blinded Veterans and the creation of rehabilitation services specifically for individuals who are blind and visually impaired. Today, rehabilitation services, including O&M, are provided through federal and state funding for individuals across the lifespan by a variety of certified rehabilitation specialists (Wiener, Welsh, & Blasch, 2010).

This tradition of support continues on a federal level through the U.S. Department of Education (DOE) and U.S. Department of Health and Human Services (HHS) via the provision of federal grants to state rehabilitation service programs for individuals who are blind and visually impaired (OOD, 2020). The Rehabilitation Services Administration (RSA), Office of Special Education Programs (OSEP) and Office of Special Education and Rehabilitative Services (OSERS) work under the DOE umbrella to ensure federal funding for vocational rehabilitation services, including O&M, for individuals with visual impairments and blindness with the understanding of its importance in both supporting the health and wellbeing of the individual and the economy as a whole. This support is further addressed by the HHS, who acts as the "U.S. Government's principal agency for protecting the health of all Americans and providing **essential human services**, especially for those who are least able to help themselves" (HHS , 2020).

For school-aged students, federal legislation also speaks to the provision of services for students with visual impairments through related service providers, including O&M instructors:

Individuals with Disabilities Education Act (IDEA) (2004) § 1401 (3)(A) In general the term "child with a disability" means a child (i) with... visual impairments (including blindness) (ii) who, by reason thereof, needs special education and related services. (26)(A) In general the term "related services" means transportation, such developmental, corrective, and other supportive services (including...**orientation and mobility services**) as may be required to assist a child

with a disability to benefit from special education. (29) The term “special education” means specially designed instruction, at no cost to the parents, to meet the unique needs of a child with a disability, including (A) Instruction conducted in the classroom, in the home, in hospitals, and institutions, and in other settings. (Individuals With Disabilities Education Act, 20 U.S.C. § 1401 (2004))

On a state level, the Ohio Guidelines for Working with Students Who Are Blind or Visually Impaired (2017) recognizes that “**orientation and mobility is essential**, sequential instruction for individuals with visual impairments in using their remaining senses...for safe movement from one place to another.” **These skills must be taught in-person by certified orientation and mobility specialists (COMS) for the safety of the student throughout the training process.**

Essential Rehabilitative Services in Times of Crisis

According to the Cybersecurity and Infrastructure Security Agency’s (CISA) Advisory Memorandum on Ensuring Essential Critical Infrastructure Workers Ability to Work During the COVID-19 Response, human service providers providing services to at-risk populations, including individuals with disabilities, are considered essential workers (Krebs, 2020, pp. 8-9). Although O&M specialists who work with individuals who are blind and visually impaired are not specifically named in the CISA language, the memorandum notes “The following list of identified essential critical infrastructure workers is intended to be overly inclusive reflecting the diversity of industries across the United States. Workers who provide human services, [include] but are not limited to industries listed within the document” (Krebs, 2020, pp. 7-8).

At the state level, Ohio’s order defines **essential workers** as healthcare and public health operations, human services operations, essential governmental functions, and essential infrastructure (Acton, DeWine, & Husted, 2020). Based on the rehabilitative services provided through orientation and mobility services, **O&M specialists are to be considered human service operations**. Within human services operations, individuals may leave their home to:

Work for or obtain services at any Human Services Operations, including any provider funded by Ohio Department of Aging, Department of Developmental Disabilities...Opportunities for Ohioans with Disabilities,[and] Department of Veterans Services...that is providing services to the public and including state operated, institutional, or community-based settings providing human services to the public. Human Services Operations includes, but is not limited to...vocational services, **rehabilitation services**...and other necessities of life for economically disadvantaged individuals, individuals with physical, intellectual, and/or developmental disabilities, or otherwise needy individuals. **Human Services Operations shall be construed broadly** to avoid any impacts to the delivery of human services, broadly defined. (Acton, DeWine, & Husted, 2020, pp. 3-4).

Position of AERO

Despite this legislative groundwork on the importance of rehabilitation services for individuals who are blind and visually impaired and the fact that O&M services are to be considered as human service operations, many agencies and school districts throughout Ohio have restricted O&M specialists from providing direct instruction to individuals due to COVID-19.

This interruption of service has sparked research within the field of blind rehabilitation, resulting in the Access and Engagement Research Report (October 2020) published by the American Foundation of the Blind (Rosenblum, et al., 2020). This research found that rehabilitation services, for students' birth-21, have been significantly impacted by the COVID-19 response across the United States and Canada, with students failing to meet IEP and IFSP goals due to limited/cancelled services and objectives that are too difficult to approach virtually. Furthermore, there is a collective concern among families and providers for student independence, with major setbacks in student learning and lost progress noted because of service changes due to the application of COVID-19 orders. This research indicates that "it may not be possible to provide remote instruction that is relevant and helpful for the student while also meeting the [legal] requirements of IDEA and the student's IEP" (Rosenblum, et al., 2020, p. 101).

Travel for educational purposes for any related service is allowed under Ohio Orders (Acton, DeWine, & Husted, 2020). Educational institutions, including public and private pre-k-12 schools and universities, are allowed to provide distance learning and in-person essential functions while maintaining six-foot distancing guidelines, "to the greatest extent possible" (Acton, DeWine, & Husted, 2020). However, in Ohio, each school district and private agency has been allowed to interpret and apply guidelines independently; thus creating an exclusion of in-person O&M instruction even though this is an essential service for many.

Declaration of O&M Services as Essential in the State of Ohio

Due to the rehabilitative needs and the safety of travelers who are blind and visually impaired, it is the position of AERO that O&M services in the State of Ohio are recognized as **essential services**. With this recognition, it is the position of AERO that educational institutions, as well as private and public agencies, review their individual exclusionary guidelines on COVID-19 to allow O&M specialists who work with individuals with visual impairments and blindness to provide essential in-person services in times of crisis.

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