Beyond the O&M VISSIT:
Advocating for Appropriate Service Intensity

Presented by
Rona Pogrund, Ph.D., TVI, COMS
Texas Tech University, Austin, TX
Rona.Pogrund@ttu.edu

Shannon Darst, Ph.D., TVI
Stephen F. Austin State University, Nacogdoches, TX
darstsd@sfasu.edu

Heather Munro, M.Ed., TVI, COMS
Stephen F. Austin State University, Nacogdoches, TX
Heather.Munro@ttu.edu

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PowerPoint Content

Slide 1: Beyond the O&M VISSIT:
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Shannon Darst, Ph.D., TVI
Heather Munro, M.Ed., TVI, COMS

Slide 2: Presentation Agenda

• Identify Discrepancies in Current Service Intensity Provision
• Planning Your Advocacy Approach
• Advocacy Strategies and Methods
• Administrator Feedback
• Case Study – Advocacy in Action

Slide 3: Are You Providing Appropriate Service Intensity?

• Base your answer on facts of total hours worked per week:
  o Document all student need using O&M VISSIT (caseload) (both direct and collaborative consultation)
  o Document all time spent working beyond student service time (workload)
    o Travel time (in addition to other workload activities)
• Compare your total hours worked (caseload, workload, travel) to a 40-hour work week.
Slide 4: Planning Your Advocacy Strategies

- Understand the power structure in the district/co-op
- Design a well-orchestrated effort
- Present facts in a non-threatening manner
- Supporter attitude rather than adversarial attitude
- Stay connected and communicate with your ESC VI and/or O&M consultant

Slide 5: What Do Administrators Need?

Written Summary of Need for More Support:

- Documentation of student need for services
- Documentation of current workload time beyond service time
- Input from all VI/O&M team members, if applicable
- Rationale
- Specific recommendations for support

Slide 6: What Do Administrators Need? (cont.)

Before the Meeting and Discussion:

- Documented, thoughtful, and reasoned responses to justifications
- You need to be a BELIEVER in what you are presenting
- Rationale developed in support of more personnel must be congruent with the possible negative impacts of hiring more personnel
Slide 7: How You Do You Approach Your Administrator?

- Have a positive, open attitude!
- Keep your emotions in check.
- Maintain professional intentions during discussion.
- Approach with an attitude of strength, not weakness
- Have a track record of dependability, leadership, going “above and beyond”
- Be respectful of your administrator’s time.

Slide 8: Administrator Characteristics/Styles

- Determine your administrator’s communication style
- Allow your administrator’s management style to guide you when advocating for additional support
- Assume your administrator has student-centered motives and intentions that are driving his/her decision-making
- Communicate with your administrator regularly about ALL aspects of your job
- Prepare your advocacy statement based on your administrator’s current understanding of the COMS’ role and responsibilities

Slide 9: Administrator Perspective

- What documentation would you need from your COMS in order to request a new position from administration above you?

Figure 1 - Photo of Administrator in her office, gesturing with her hands
Slide 10: Administrator Perspective

Figure 2 - Appendix A: Workload Activity Clusters (see also pages 7-9 of this handout).

Slide 11: Administrator Perspective

Figure 3 - COMS Workload Analysis Chart (see also page 11 of this handout).

Slide 12: Administrator Perspective

• What do you recommend to other COMS who are approaching their administrator as to the best way to advocate for more positions? How did the COMS in AISD approach you?

Figure 4 - Photo of Administrator in her office
Slide 13: Administrator Perspective

- What other advice do you have for teachers who need additional personnel?

![Figure 5 - Photo of Administrator in her office with hand below her chin](image)

Slide 14: Case Study – Advocating for Appropriate Service Intensity

- District Description
  - Suburb of major metropolitan city
  - Rural geographic location
  - Town population: ≈ 10,000
  - ISD Land area ≈ 158 sq. mi.
  - ISD includes 7 schools (3 elementary, 1 MS, 1 HS, 2 alternative)
  - Student count ≈ 4500
  - Students who receive O&M services = 13
  - VI staff = 1 TVI – part-time and 1 COMS-part-time

Slide 15: Case Study – Advocating for Appropriate Service Intensity

- O&M VISSIT score from 13 students:
  - Direct Service Time Recommended/Accepted by IEP committee: 900 minutes/week
  - Collaborative Consultation Service Time Recommended/Accepted by IEP committee: 220 minutes/week
Travel Time: 240 minutes/week (approximate; based on travel time within district without obstacles [construction, accident, traffic])

**Slide 16: Documentation: O&M VISSIT Data**

**Key:** Blue = Direct Service & Red = Collaborative Consultation

<table>
<thead>
<tr>
<th>O&amp;M Service Time</th>
<th>Direct</th>
<th>Collaborative Consultation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
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<tr>
<td>4</td>
<td></td>
<td></td>
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<tr>
<td>5</td>
<td></td>
<td></td>
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<tr>
<td>6</td>
<td></td>
<td></td>
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<td>7</td>
<td></td>
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<td>8</td>
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<td></td>
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<td>9</td>
<td></td>
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<td>10</td>
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<td>11</td>
<td></td>
<td></td>
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<tr>
<td>12</td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Figure 6 - Pie Chart featuring the numerous components included in the Documentation Workload

Areas of Workload shown on the pie chart above include:

- **Direct Service Time** – all direct service time totals from each student’s O&M VISSIT
- **Collaborative Consultation Time** – all collaborative consultation service time totals from each student’s O&M VISSIT
- **Materials/Equipment Preparation** – includes ordering materials
- **Travel Time**
- **IEP/IFSP Meeting – Planning/Participation**
- **Team/Staff Meetings**
- **Lesson Preparation**
- **Evaluations**
- **District-Required Meetings**
- **Duty-Free Lunch**
- **Applications for Other Services or Program Development – ESY, summer programs, summer camps**
- **Accountability Reporting** – progress monitoring, data collections, observations, SHARS reporting
- **Staff/Professional Development**
- **Assistive Technology Support**
- **Technical Assistance for Other Team Members**
Slide 18: Documentation: Rationale and Recommendations

- Part-time work week (PTE) = 1440 minutes/wk (24 hours/wk)
- Weekly time spent on direct and collaborative consultation = 1120 minutes/wk (18.7 hours/wk)
- Travel time = 240 min/wk (4 hours/wk)
- Duty free lunch (legal requirement) = 150 min/wk (2.5 hours/wk)
- Planning period (legal requirement) = 225 min/wk (3.75 hours/wk)
- Special Ed team meeting including TVI = 90 min/wk (1.5 hours/wk)
- All other duties included in TVI workload = 190 min/wk (3.2 hours/wk)

**TOTAL WORKLOAD TIME PER WEEK: 2015 min/wk (33.5 hours/wk)**

Slide 19: Implications of Lack of Additional Support

- Students’ needs may not be appropriately met
- There may not be time to address ECC areas with all students, as needed (out of compliance with Texas ECC law)
- Puts itinerant model of service delivery in question if students are not receiving amount of time they actually need
- Without meeting FAPE, as required by federal law, there is risk of due process complaints or lawsuits by families (costly to districts)
- COMS burnout if overloaded and feeling like they are not effective in their job if spread too thin
Slide 20: Questions? Comments?

Slide 21: Contact Information

- Rona Pogrund, Ph.D., Texas Tech University – rona.pogrund@ttu.edu
- Shannon Darst, Ph.D., Stephen F. Austin State University – darstsd@sfasu.edu
- Heather Munro, M. Ed., Stephen F. Austin State University Ph.D. candidate, Texas Tech University – heather.munro@ttu.edu

O&M VISSIT website - https://www.tsbvi.edu/om-vissit
Appendix A

Workload Activity Clusters

Figure 7 Workload clusters diagram. (Content of diagram listed below)
Appendix A

Workload Activity Clusters

Direct services to students

- Counsel students
- Evaluate students for eligibility for special education
- Identify students with speech and language impairment
- Implement IEPs and IFSPs
- Provide direct intervention to students using a continuum of service-delivery options
- Re-evaluate students

Indirect services that support students’ educational programs

- Engage in dynamic assessment of students
- Connect standards for the learner to the IEP
- Consult with teachers to match students learning style and teaching style
- Design and engage in pre-referral intervention activities
- Design/recommend adaptations to curriculum
- Design/recommend modifications to the curriculum to benefit students with special needs
- Participate in activities designed to help prevent academic and literacy problems
- Observe students in classrooms
- Screen students for suspected problems with communication, learning, and literacy
Indirect services that support students’ educational programs

- Analyze and engineer environments to increase opportunities for communication
- Analyze demands of the curriculum and effects on students
- Attend student planning teams to solve specific problems
- Attend teacher/service provider meetings (planning, progress monitoring, modifications to program)
- Communicate and coordinate with outside agencies
- Contribute to the development of IEPs, IFSPs
- Coordinate with private, nonpublic school teachers and staff
- Design service plans
- Design and implement transition evaluations and transition goals
- Design and program high-, medium-, and low-tech augmentative communication systems
- Engage in specials preparation to provide services to students (e.g., low incidence populations, research basis for intervention, best practices)
- Interview teachers
- Make referrals to other professionals
- Monitor implementation of IEP modifications
- Observe students in classrooms
- Plan and prepare lessons
- Plan for student transitions
- Provide staff development to school staff, parents, and others
- Program and maintain assistive technology / augmentative communications systems (AT/AC) and equipment
- Train teachers and staff for AT/AC system use
Activities that support compliance with federal, state, and local mandates

- Attend staff/faculty meetings
- Carry out assigned school duties (e.g. hall, lunch, bus, extracurricular)
- Collect and report student performance data
- Complete compliance paperwork
- Complete daily logs of student services
- Complete parent contact logs
- Document services to students and other activities
- Document third-party billing activities
- Participate in parent/teacher conferences
- Participate in professional association activities
- Participate in professional development
- Participate on school improvement teams
- Participate on school or district committees
- Serve multiple schools and sites
- Supervise paraprofessionals, teacher aides, interns, CFYs
- Travel between buildings
- Write funding reports for assistive technology and augmentative communication
- Write periodic student progress reports
- Write student evaluation reports

COMS WORKLOAD ANALYSIS CHART

Once the one week time study is completed, convert the time into hours and record below. One FTE staff: 37.5 hours a week

<table>
<thead>
<tr>
<th>Total # of Students Served:</th>
<th>18</th>
<th>COMS NAME:</th>
<th>Elizabeth Desart</th>
<th>FTE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hours per day spent in:</td>
<td></td>
<td>Monday</td>
<td>Tuesday</td>
<td>Wednesday</td>
</tr>
<tr>
<td>Direct Services to Students</td>
<td></td>
<td>1.0</td>
<td>.50</td>
<td>2.5</td>
</tr>
<tr>
<td>Indirect Services that</td>
<td></td>
<td>2.25</td>
<td>0</td>
<td>1.0</td>
</tr>
<tr>
<td>Support Educational</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Outcomes</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Indirect Activities that</td>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Support Students in the</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Least Restrictive</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Environments</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Activities that Support</td>
<td></td>
<td>1.75</td>
<td>7.25</td>
<td>2.75</td>
</tr>
<tr>
<td>Compliance with Federal,</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>State, and Local Mandates</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other: district email/phone</td>
<td></td>
<td>3.0</td>
<td>.75</td>
<td>.50</td>
</tr>
<tr>
<td>calls, etc.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals:</td>
<td>8.0</td>
<td>8.5</td>
<td>6.75</td>
<td>8.25</td>
</tr>
</tbody>
</table>
Total hours per week: 27.25 indirect + 11.5 direct = 38.75 - FTE: 37.5 hours - Over 1.0 hour
Austin ISO Orientation and Mobility Services

Workload Analysis

January 14, 2019

Completed by:
Beverly Jackson
Certified Orientation and Mobility Specialist
Education Specialist, ESC Region 13
512-919-5331
beverlyjackson@esc13txed.net
Description of Workload Analysis Process

Austin ISO currently has 5 Certified Orientation and Mobility Specialists (COMS) on staff. Three COMS are full time, the fourth COMS is a 75% employee, and the fifth COMS is a 50% employee.

The workload analysis included the following steps:

1. Examine current students on caseload to ensure students are receiving the appropriate amount and type of services using one of the following tools:
   a) The Michigan Orientation and Mobility Severity Rating Scale (Michigan Dept. of Education)
   b) VISSIT: Orientation and Mobility Visual Impairment Scale of Service Intensity of Texas (TX School for Blind and Visually Impaired)

2. Examine current caseload/workload distribution between COMS to ensure O&M services are divided equally between geographic areas and service time per ARD recommendation.

3. Each COMS completed a time study during a typical week of school. The time study looked at 4 categories of tasks that a COMS is responsible for completing at any given time. Each COMS monitored every 15 minute unit of time and tallied it on the time study next to the correct task. (See page 3 for a description of each category of tasks completed).
   a) Once the time study was completed, the time spent in each category was converted to hours for each COMS and the total number of hours worked per week were calculated. (See page 4 of report)
   b) The total number of hours worked per week was divided by the corresponding work week (Ex. 37.5 hours for a full time, 29.5 for a 75% employee, and 19.0 for a 50% employee). Results are reported in chart of page 4.
4. Additional Data Reviewed
   a) Growth of VI student population in AISD
   b) Other duties assigned to COMS and Lead COMS not reported
   c) Geographic size of district and increasing demands related to travel between campuses in a large city experiencing higher than usual amounts of traffic
   d) AISD COMS caseload was compared to another large district in the same region

Description of Workload Activities:

Direct services to students:
Direct services to students include evaluation for eligibility for special education, identification of students with O&M needs, implementation of IEPs and IFSPs, direct intervention to students using a continuum of service delivery models and the reevaluation of students.

Indirect services that support Educational Outcomes:
Indirect services that support educational outcomes include analysis and engineering of environments to increase opportunity, analysis of the demands of the curriculum and effect on students, planning and staffing meetings, communication with outside agencies, IEP & IFSP development, coordination with teachers and other professionals, service plans, transition evaluations and transition goal developments, service provision research and preparation, referrals to other professionals/agencies, monitor IEP modifications and/or accommodations, observations of students in a variety of settings, provision of staff development and/or training.
Indirect activities that support students in the LRE & General Education Curriculum:

Indirect activities that support LRE and general education curriculum include dynamic assessments, PLAAFP development, working with teachers to match student learning style/needs with teaching style, designing adaptations to curriculum and instruction delivery, designing/recommending modifications, observation of students in classroom, screenings. In addition, due to the complexity of services to meet the IEP/IFSP requirements for a variety of students from birth to age 21, with varying degrees of vision loss and additional disabilities, the amount of prep and instructional time is significantly increased.

Activities that support compliance with federal, state, and local mandates:

Activities that support compliance include job duties, collection and reporting of student data, completion of compliance paperwork, service logs/documentation, parent contact logs, documentation of all services and job activities, parent/teacher conferences, professional association/CEU activities, school or district committees/teams, serve multiple sites/schools, supervise or mentor others, travel between buildings, report writing, progress reports and evaluation/reevaluation reports.
Workload Activities performed by COMS (Certified Orientation and Mobility Specialist)

<table>
<thead>
<tr>
<th>Certified Orientation and Mobility Specialist</th>
<th>Number of Sites</th>
<th>Number of Students</th>
<th>Total Direct Service Time per week</th>
<th>Total of Indirect Services and Activities/week</th>
<th>Total time of Compliance Activities/week</th>
<th>Total time worked per week</th>
</tr>
</thead>
<tbody>
<tr>
<td>COMS #1 FTE (S Hyzy: lead COMS /campus based)</td>
<td>14</td>
<td>17</td>
<td>10.5</td>
<td>7.5</td>
<td>25.75</td>
<td>43.75</td>
</tr>
<tr>
<td>COMS #2 FTE (E Desart: campus based)</td>
<td>15</td>
<td>18</td>
<td>11.5</td>
<td>13.25</td>
<td>14.0</td>
<td>38.75</td>
</tr>
<tr>
<td>COMS #3 FTE (K Salmon :campus based)</td>
<td>17</td>
<td>22</td>
<td>14.0</td>
<td>7.5</td>
<td>19.75</td>
<td>41.25</td>
</tr>
<tr>
<td>Certified Orientation and Mobility Specialist</td>
<td>Number of Sites</td>
<td>Number of Students</td>
<td>Total Direct Service Time per week</td>
<td>Total of Indirect Services and Activities/week</td>
<td>Total time of Compliance Activities/week</td>
<td>Total time worked per week</td>
</tr>
<tr>
<td>---------------------------------------------</td>
<td>-----------------</td>
<td>-------------------</td>
<td>-----------------------------------</td>
<td>-----------------------------------------------</td>
<td>------------------------------------------</td>
<td>---------------------------</td>
</tr>
<tr>
<td>COMS #4 .75 FTE (K Tyler: campus based)</td>
<td>14</td>
<td>10</td>
<td>13.75</td>
<td>8.75</td>
<td>10.75</td>
<td>33.25</td>
</tr>
<tr>
<td>COMS #5 .50 FTE (F Vanderpool: campus based)</td>
<td>3</td>
<td>19</td>
<td>7.0</td>
<td>8.0</td>
<td>9.25</td>
<td>24.25</td>
</tr>
<tr>
<td>Totals:</td>
<td>63 Sites</td>
<td>86 students</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Analyzing the Data

- A full time employee (FTE) is expected to work 37.5 hours a week (40 hours a week minus a 30 minute duty free lunch break each day worked).
- An employee who works 75% is expected to work 29.5 hours a week (four eight hour days, totaling 32 hours a week, minus a 30 minute duty free lunch each day worked).
- An employee who works 50% is expected to work 19 hours a week (2.5 days a week, totaling 20 hours a week, plus a duty free lunch for 2 days worked).

Calculations:

<table>
<thead>
<tr>
<th>Certified Orientation and Mobility Specialist</th>
<th>Total Hours worked per week</th>
<th>Calculation for FTE Actual Hours Worked I Expected Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>COMS #1 FTE (SH) (lead/campus based)</td>
<td>43.75</td>
<td>43.73 / 37.5 hrs. = 1.17 (FTE)</td>
</tr>
<tr>
<td>COMS #2 FTE (ED) (campus based)</td>
<td>38.75</td>
<td>38.75 / 37.5 hrs. = 1.03 (FTE)</td>
</tr>
<tr>
<td>COMS #3 FTE (KS) (campus based)</td>
<td>41.25</td>
<td>41.25 / 37.5 hrs. = 1.09 (FTE)</td>
</tr>
<tr>
<td>COMS #4 .75 FTE (KT) (campus based)</td>
<td>33.25</td>
<td>33.25 / 29.5 hrs. = 1.13 (75% Employee)</td>
</tr>
<tr>
<td>COMS #5 .50 FTE (FV) (campus based)</td>
<td>24.25</td>
<td>24.25 / 19 hrs. = 1.28 (50% Employee)</td>
</tr>
</tbody>
</table>
Results:
Based on the calculations above, the results of the weekly time study support the need for an additional 70% employee to ensure that staff can implement all IEP direct and indirect services effectively as written in the IEP.

Other Information to Consider:
• Growth of population:
  o In January 2018, AISD had 124 students receiving special education services as a VI student.
  o In January 2019, AISD currently has 133 students receiving special education services as a VI student.
• Since August 2018, the COMS have received and evaluated 14 new students for O&M services. The last time any additional COMS staff was added was in 2012.
• Comparison between AISO with Round Rock ISO
  o Austin ISO serves 133 VI students (86 who receive O&M services at 63 sites) with 4.25 Certified Orientation and Mobility Specialists.
  o Round Rock ISO currently serves a total of 93 VI students (69 who receive O&M services at 35 sites) with 5.0 full time Certified Orientation and Mobility Specialists.
• The lead COMS spends a minimum of an additional 2-3 hours a week performing duties related to being the lead COMS, including developing and presenting professional development, weekly meeting with VI supervisor and team lead, serving as the point of contact for team, working with VI supervisor to develop new protocols for the O&M department, and supporting COMS with planning, evaluations, and service delivery to students.
• In addition to performing duties related to 86 students with IEP's, all COMS are required to support and provide annual documentation/monitoring of Expanded Core Curriculum skills on an additional 47 students.
• All COMS are required to attend monthly team meetings consisting of an additional 2 hours a month.
• COMS are required to maintain certification through ACVREP (Academy for Certification of Vision Rehabilitation and Education Professionals) which requires additional time to attend ACVREP approved professional development opportunities.
• Based on the results of the Michigan Severity Rating Scale and the O&M VISSIT tools to determine type and amount of services, the students with higher intensity of needs (students who are functionally blind) would benefit from more frequent services. For example, based on results from one of the severity rating scales, a student currently receiving one 60 minute session per week of direct instruction would benefit from receiving two 30 minute sessions per week. Although staff is able to meet the required service time, the frequency of visits may not be increased due to caseload demands. At this time, it appears that services are being provided based on the availability of staff instead of the specific needs of the student.
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Notes
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