

1                   **Rates for Specialized Services for Blind and Visually Impaired Customers**  
2   **Discussion Paper**

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4   **Background**

5 For the past two years, Texas Workforce Commission’s (TWC) Vocational Rehabilitation (VR)  
6 Division has experienced a significant decline in contract providers that provide Orientation &  
7 Mobility Services (O&M), Diabetes Education, and Independent Living Skills (ILS) to  
8 customers who are blind and visually impaired. These services are critical to a customer’s  
9 success in becoming competitively employed in the VR program or living independently through  
10 the Older Individuals Who Are Blind program (OIB).

11 Rates for these providers have not been increased in ten years and providers report that current  
12 rates are not sufficient to cover their expenses. Recent changes in travel reimbursement for  
13 providers magnified this issue. Prior to combination of the two legacy VR divisions, these  
14 providers received actual reimbursement of all travel expenses, which served to augment their  
15 contracted rates. Under the combined VR Standards for Providers, these providers are still  
16 eligible to receive travel reimbursement for mileage over 50 miles and for other allowable travel  
17 expenses but must do so within the State of Texas travel guidelines and rates.

18 Provider rates vary based on discipline. VR staff have reviewed the rates that providers are paid  
19 in the areas of O&M, Diabetes Education, and ILS. Research involved contacting other states  
20 and identifying the rates they pay to providers in the same service areas, as well as looking at  
21 how travel costs were considered. A summary of staff’s review and proposed rates are included  
22 below.

23   **Issue 1: Orientation and Mobility Services**

24 TWC VRS currently pays \$60 per hour for both O&M assessment and O&M training. Staff  
25 researched the rates of 25 other states. The average rate that those states pay is \$75.19. The rates  
26 varied from a high of \$151 in Massachusetts to a low of \$55 in California.

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28   **Issue 2: Diabetes Education Services**

29 TWC VR currently pays \$95 per hour for individual and \$55 per hour per customer for group  
30 training. It has become increasingly difficult to recruit and retain Diabetes Education service  
31 providers. Diabetes educators with VR are specifically trained to work with individuals with  
32 diabetes who are blind or visually impaired. Eleven local workforce development areas  
33 (LWDAs) do not have diabetes educators; additionally, many of the 17 rural LWDAs with  
34 diabetes educators, particularly in the east and west TWC VR regions, have rural counties that  
35 are not served by the educator.

36 Because other states do not provide disability competent diabetes self-management education  
37 services, staff used the rates on the Centers for Medicare and Medicaid Services (CMS)  
38 physician fee schedule to compare benefits paid in Texas to comparable benefits in 25 other  
39 states.<sup>1</sup> Disability competent training addresses the unique physical and mental health functions,  
40 physiology, and communication and other barriers for people living with diabetes and disability.

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<sup>1</sup> <https://www.cms.gov/apps/physician-fee-schedule/search/search-criteria.aspx>

1 The hourly rates in other states varied from a low of \$110.96 to a high of \$134.48. Texas has  
2 eight regional rates from a low of \$109.40 per hour to a high of \$120.52. The average of  
3 researched rates in the 25 states is \$117.82, while the average of Texas' eight rates is \$117.08.

4 Current expectations of diabetes self-management education service providers include the  
5 following:

- 6 • Attendance at the Diabetes Education Texas Confidence Builder training before the  
7 initial contract and at least every two years after, at the provider's expense.
- 8 • Providers are paid for direct, in person services to customers and not for interactions with  
9 TWC staff and customers by telephone, e-mail, or other remote contact methods.
- 10 • Providers pay the cost of continuing education units to maintain licensure.

### 11 **Issue 3: Independent Living Skills Services**

12 The current reimbursement rate for Texas ILS services is \$35 per hour. Staff contacted numerous  
13 states to request information about payment rates; however, many states provide their ILS  
14 services training in-house and as part of a larger independent living program that includes the  
15 State Independent Living Services grant, which in Texas is administered by the Health and  
16 Human Services Commission. Of the four states that responded, only Ohio purchases ILS  
17 services similarly to Texas, but at a rate of \$74 per hour. Given the limited sample of  
18 comparable information from other states, staff reviewed the tasks performed by an ILS provider  
19 and the skills required for those providers to train a customer who is blind and visually impaired.  
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21 The required education, knowledge, skills, and tasks performed by ILS providers are very similar  
22 to those of O&M providers. Both provider qualifications require at least a bachelor's degree in a  
23 field related to training people with disabilities and similar experience in working with the blind  
24 and visually impaired population. In addition, both types of providers may serve the same  
25 customer, with O&M providers focused more intensely on developing a customer's travel skills.  
26 O&M providers are paid \$60 an hour with a proposed rate increase to \$75 an hour.  
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28 There are also fewer ILS than O&M providers across the state, and most travel at least two hours  
29 to serve a customer. Travel time in rural areas is often more than that. The TWC OIB program  
30 has 14 TWC OIB Workers to cover the state and provide skills training like that provided by  
31 staff in other states. In addition, they must perform eligibility and case management  
32 responsibilities. As a result, the OIB program is significantly dependent upon an insufficient  
33 provider base to provide statewide services to customers who are blind and visually impaired and  
34 require training to develop the skills necessary to live independently in their homes and  
35 communities.  
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### 37 **Decision Points**

#### 38 Orientation and Mobility Services

39 Based on the information gathered on other VR state agency policies and rate schedules for the  
40 provision of field O&M, staff is proposing an increase to the hourly rate for O&M Services from  
41 \$60 to \$75. This is consistent with the 25-state average for the same service, with the following  
42 breakdown:

- 43 • O&M Assessment: \$75 per hour

- 1 • O&M Training – Individualized: \$75 per hour
- 2 • O&M Training – Group
- 3 ○ \$75.00 per hour for the first customer
- 4 ○ \$37.50 per hour for each additional customer

5 Diabetes Education Services

6 Staff is proposing an adjustment to the rates for Diabetes Education services to align with CMS,  
7 as follows:

- 8 • Diabetes Self-Management Assessment: \$117 per hour
- 9 • Diabetes Skills Training (Individualized Services Only): Increase from \$95 to \$117 per  
10 hour
- 11 • Group Services Only: Increase from \$55 to \$60 per customer
- 12 • Post-training Assessment: \$117 per hour

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14 Independent Living Skills Services

15 Based on the similarity of required education and knowledge, skills, and tasks of ILS providers  
16 and O&M providers, and due to the critical need to build this provider base to support the OIB  
17 program, staff is proposing an increase in the ILS hourly rate from \$35 to \$75. This rate aligns  
18 with the proposed Texas O&M provider rate, and the Ohio ILS hourly rate.

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20 **Fiscal Impact**

21 DOI calculated the fiscal impact by determining what the TWC VR paid in SFYs 2017 and 2018  
22 and then calculated what the impact would have been for those years with the proposed rate  
23 increases.

24 **Table 1: Actual Expenditures for Diabetes, O&M, and IL Skills Training**

Training Service	SFY 2017 Expended	SFY 2018 Expended
Diabetes	\$198,407	\$121,362
IL Skills	\$10,397	\$12,288
O&M	\$778,012	\$616,383
<b>Total</b>	<b>\$986,817</b>	<b>\$750,034</b>

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1 **Table 2: Fiscal Impact of Proposed Rates on Expenditures for Diabetes, O&M, and IL**  
 2 **Skills Training**

<b>Training Service</b>	<b>Proposed Percentage Increase</b>	<b>Increased Amount SFY 2017</b>	<b>Increased Amount SFY 2018</b>
Diabetes	23%	\$45,634	\$27,913
IL Skills	111%	\$11,541	\$13,640
O&M	25%	\$194,503	\$154,096
<b>Total</b>		<b>\$251,678</b>	<b>\$195,649</b>

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 4 Staff believes the SFY 2017 expended amount for all services (\$986,817) is a more accurate  
 5 representation of customer need for O&M, diabetes education, and ILS training. Applying the  
 6 proposed percentage increases shown in Table 2, staff estimates an additional \$251,678 in annual  
 7 Client Services expenditures if these proposed rates are adopted, for a total annual expenditure of  
 8 \$1,238,495.

9 If approved, the proposed rate increases will be published in Standards for Providers Manual  
 10 Chapter 5: Orientation and Mobility Services, Chapter 7: Diabetes Self-Management Education  
 11 Services and Chapter 10: Independent Living Services for Older Individuals who are Blind. In  
 12 addition to the proposed rate changes, staff has also made procedural and technical revisions to  
 13 each chapter to clarify language and update processes.

14 **Rehabilitation Council of Texas**

15 The Rehabilitation Council of Texas agrees with the proposed rate increases.