

*Alliance of and for Visually Impaired Texans*

**Testimony to the Texas Senate Committee on Education  
Public Hearing  
June 23, 2008**

***Special Education for Students with Visual Impairments***  
*Mrs. Marty Murrell, Chair*

**STUDENT OUTCOMES:**

- Specific data on outcomes or performance of students with visual impairments could not be located. Such data is seldom reported because of the low incidence of this disability.
- Informal surveys by AVIT indicate students are not receiving the supports and services they need to successfully achieve post graduation goals.

**SERVICES TO STUDENTS**

- Children with visual impairments do not receive sufficient essential services such as:
  - Orientation and mobility evaluation and training for safe and independent travel, including the use of a cane (See data below.)
  - Low vision clinical evaluations from licensed professionals to prescribe devices that allow access to print materials
  - Instruction in special curricular areas necessary for independence and for learning:
    - ⇒ Braille reading and writing
    - ⇒ Daily living skills
    - ⇒ Social skills
    - ⇒ Use of essential assistive technology.
- Districts cannot provide the critical, expensive, sophisticated, unique assistive technology or training in its use.
- Parents do not receive sufficient training and support, especially needed because blindness is a low incidence disability, and parents often are isolated from other families with similar needs.
- Districts and regional education service centers (ESCs) do not hire sufficient numbers of certified teachers of the visually impaired, orientation and mobility instructors.
- Local braille production capacity is reduced.
- ESCs have reduced the FTEs of essential VI consultants and certified orientation and mobility instructors, significantly reducing capacity at the regional level to support students and families in the districts.

**ORIENTATION AND MOBILITY**

- Only 2,293 of 7,967 (28.7%) children with visual impairments are receiving O&M services!
- Only 3,615 of 7,967 (45.4%) have received an O&M evaluation within the past three years.
- Only 40% of the 3,119 students with additional disabilities have received an O&M evaluation within the past three years.
- Only 50% of the 552 students with deafblindness have received an O&M evaluation within the past three years, and only 33% are receiving O&M services.
- Only 40.5% of children under the age of five have received an O&M evaluation within the past three years.

**PERSONNEL PREP: TVI AND COMS®**

- There is a severe shortage of certified Teachers of Students with Visual Impairments (TVIs) and of Certified Orientation and Mobility Instructors (COMS®)
- The two teacher prep and O&M programs in Texas turned away over 90 applicants because of insufficient funding
- Teachers in training are short circuiting the program and using the “certification by examination” route. These teachers do not have the knowledge and skills to do the job.

**SOLUTIONS:**

1. Increase funding for Statewide Services for Students with Visual Impairments in Rider 18, Article III of the General Appropriations Bill—TEA, also referenced in TEC §30.002(g)]
2. Increase the funding for the Teacher Preparation Consortium referenced in Rider 3, Article III of the 2008-2009 General Appropriations Act—Texas School for the Blind and Visually Impaired, (page III-27).
3. Amend TEC §30.002 to require that an orientation and mobility evaluation by a Certified Orientation and Mobility Specialist (COMS®) be a part of the initial full and individual evaluation for every student considered for eligibility for special education as visually impaired or deafblind.

For a students with a visual impairment or deafblindness require a COMS® to be a member of the multidisciplinary team that collects or reviews evaluation data in connection with the determination of a student's eligibility. [See TAC 89.1040(b)(2) and (c)(12)]

Require that O&M evaluations address O&M needs in a variety of environments (home, school, community), situations (day, night), and in unfamiliar settings.

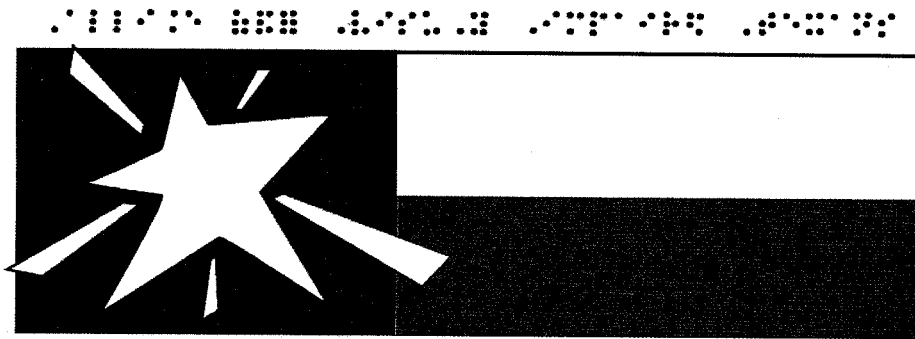
4. Pass legislation that prevents teachers of students with visual impairments from being certified simply by passing the required exams. Mandate that all TVIs must complete the SBEC-approved essential coursework before taking the TExES in Visual Impairment and before becoming certified.

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**About AVIT**

The Alliance of and for Texans with Visual Impairments (AVIT) is a non-profit coalition of 26 member organizations committed to speak on behalf of children and adults with visual impairments. We include organizations of parents, consumers, educators, medical professionals, and other service providers.

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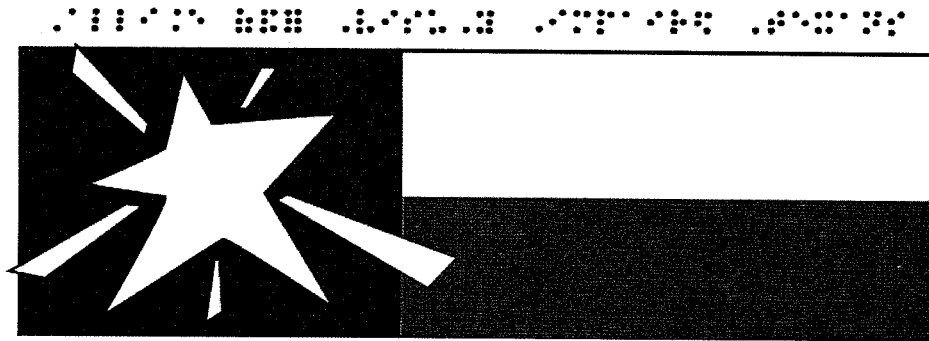


*Alliance of and for Visually Impaired Texans*

## **AVIT MEMBER ORGANIZATIONS**

- American Council of the Blind of Texas, Inc.
  - American Foundation for the Blind
  - Austin Council of the Blind, Inc.
  - Austin Junior Woman's Federation
- Blind Ambitions/Low Vision Network of Texas
  - C. L. Productions
- Central Texas Professionals for the Visually Impaired
  - Dallas Lighthouse for the Blind, Inc.
- Deafblind Multihandicapped Association of Texas
  - East Texas Lighthouse for the Blind
    - Helen Keller National Center
    - Houston Council for the Blind
  - Lighthouse for the Blind of Houston
- National Association for Parents of Children with Visual Impairments
  - North Texas Professionals in Visual Impairment
    - Reading & Radio Resource
  - Recordings for the Blind and Dyslexia, Inc.\*
- Texas Association for Parents of Visually Impaired Children
- Texas Association for the Education & Rehabilitation of the Blind & Visually Impaired
  - Texas Chargers, Inc
  - Texas Ophthalmological Association
    - Texas Optometric Association
- Texas University Professionals in Visual Impairments
  - Travis Association for the Blind
    - TXAER O&M Division\*

\* In process



*Alliance of and for Visually Impaired Texans*

## Request for Increased Funding

### Article III of the General Appropriations Bill, TEA, Rider 18 Statewide Services for Students with Visual Impairments [TEC §30.002(g)]

#### Purpose of Funds

- To ensure that children who are blind and visually impaired receive, *in their local schools*, the unique and highly specialized services needed to meet educational goals set by the state and to become productive citizens of Texas.
- To serve as a major catalyst for interagency coordination and collaboration to maximize efficient use of the very limited specialized resources available to this very low incidence population.
- To improve the achievement of all students who have a visual impairment (birth-22), and ensure that appropriate and comprehensive services are available.

#### Problem:

**The per child value of the allocation has decreased by 65%  
without considering the impact of 20+ years of inflation!!!**

Year	Students with Visual Impairments	Per child allocation
1985	2,963*	\$2,026*
1990	4,129*	\$1,454*
1995	5,221	\$1,150
2000	6,601	\$ 909
2005	7,573	\$ 747
<b>2007</b>	<b>7,967</b>	<b>\$ 710</b>

To return the funding to the 1985 per child level would require a total of **\$16,144,683**.  
A return to the 1995 level would require a total of **\$9,163,754**.

#### Solution:

**AVIT REQUESTS AN INCREASE of \$2,844,732 for a total of**

**\$8,500,000**

#### Educational Results for Children

- Children with visual impairments do not achieve as well as their peers on statewide assessments.
- All children with visual impairments do not graduate from high school with the independent living and vocational skills to succeed as adults, and may need additional supports from the State post graduation.

## Background

- These funds and the underlying law originated in 1975 with the 64th legislature.
- In 1985, the allocation was \$6,005,267 and virtually has been flat-funded for the past 20 years.
- TEA has provided an additional \$1,000,000 of IDEA-B funds for 15? years.
- A \$349,999 reduction occurred during the 78th legislature to \$5,655,268 for FY 2005-2006.
- TEA has supplemented that reduction with \$300,000 per year with IDEA-B Discretionary funds.

## Legislative Authority

- **Rider 18 of Article III of the 2008-2009 General Appropriations Act-Texas Education Agency: Statewide Services for Students with Visual Impairments (p. III-10)**

*Out of funds appropriated for Strategy A.2.3, Students with Disabilities, \$5,655,268 in each fiscal year is allocated for statewide services for students with visual impairments as authorized under §30.002 of the Texas Education Code.*

- **TEC §30.002 Education of Children with Visual Impairments**

*(g) To facilitate implementation of this section, the commissioner shall develop a system to distribute from the foundation school fund to school districts or regional education service centers a special supplemental allowance for each student with a visual impairment and for each student with a serious visual disability and another medically diagnosed disability of a significantly limiting nature who is receiving special education services through any approved program. The supplemental allowance may be spent only for special services uniquely required by the nature of the student's disabilities and may not be used in lieu of educational funds otherwise available under this code or through state or local appropriations.*

## Impact of Shrinking Funds

- Children with visual impairments do not receive sufficient essential services such as:
  - Orientation and mobility training for safe and independent travel, including the use of a cane
  - Low vision clinical evaluations from licensed professionals to prescribe devices that allow access to print materials
  - Instruction in special curricular areas necessary for independence and for learning:
    - ⇒ Braille reading and writing
    - ⇒ Daily living skills
    - ⇒ Social skills
    - ⇒ Use of essential assistive technology.
- Districts cannot provide the critical, expensive, sophisticated, unique assistive technology or training in its use.
- Parents do not receive sufficient training and support, especially needed because blindness is a low incidence disability, and parents often are isolated from other families with similar needs.
- Districts and regional education service centers (ESCs) do not hire sufficient numbers of certified teachers of the visually impaired, orientation and mobility instructors.
- Local braille production capacity is reduced.
- ESCs have reduced the FTEs of essential VI consultants and orientation and mobility instructors, significantly reducing capacity at the regional level to support students and families.

**Funding Flow**

- TEA flows funds to regional education service centers (ESCs) using a formula based on regional numbers of children with visual impairments.
- ESCs expend the funds based on a regional plan for students with visual impairments developed by relevant local stakeholders from various agencies, districts, and parents.
- ESCs may flow a portion of the funds directly to districts to be used according to the priorities established in the regional plan. The remaining funds support a VI component at the ESC and region-wide services.
- Funds must be used for special supplemental services unique to students with a visual impairment and may not be used in lieu of educational funds otherwise under the Texas Education Code or through State appropriations.
- Unique services may include salaries of certified teachers of students with visual impairments and certified orientation and mobility specialists; assistive technology; regional activities/programs to teach daily living skills, transition skills, independent living skills; technical assistance; staff development; parent training and support; local braille transcribing; etc.

**Questions?****Contact:**

Mrs. Marty Murrell, Chair

Alliance of and for Texans with Visual Impairments (AVIT)

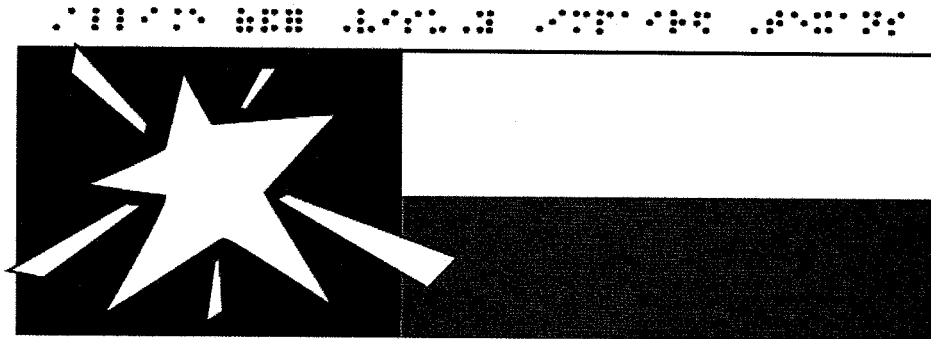
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***Alliance of and for Visually Impaired Texans***

**Funding Increase for University Programs to Prepare Teachers of Students with Visual Impairments and Orientation and Mobility Specialists**

**Background**

During the 77<sup>th</sup> Legislature (2001), a rider was included in the budget of the Texas School for the Blind and Visually Impaired (TSBVI) that provided \$900,000 to support two state university programs and a mentor program to address the critical shortage of certified teachers of students with visual impairments (TVI) and certified orientation and mobility specialists (COMS).

The funds are taken from the IDEA-B funds of the Texas Education Agency (TEA) and placed in the budget of the Texas School for the Blind and Visually Impaired. The amount has not changed since 2001.

**Legislative Authority**

The allocation is currently referenced in Rider 3, Article III of the 2008-2009 General Appropriations Act—Texas School for the Blind and Visually Impaired, (page III-27).

*3. Teacher Preparation Consortium. Out of the funds appropriated above in Strategy B.1.1, Technical Assistance, \$900,000 in each year of the biennium is Federal CFDA 84.027, Special Education Grants. These funds shall be used to support professional preparation for teachers of students with visual impairments. The funds shall be expended under the provisions of a memorandum of understanding executed by Texas School for the Blind and Visually Impaired, Texas Tech University, and Stephen F. Austin University.*

**Outcomes:**

**Completers In Five Years: 2002-2007**

	Total TVIs—167*		Total COMS—50	
	SFASU	TTU	SFASU	TTU
2002-03	18	15	5	4
2003-04	23	10	0	5
2004-05	23	10	6	9
2005-06	33	16	5	2
2006-07	15	4	5	9
Totals	112	55	21	29

**Currently Enrolled in Programs**

2007-08	20	61	5	8
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\*At least 30 additional individuals completed some coursework using program funding, and became certified via the certification-by-exam-only method. They are not included in this chart.

### **Problems—University Programs**

- There is a critical shortage of TVIs and COMs in Texas. Even greater shortages are anticipated because of eminent retirements. See <http://www.tsbvi.edu/pds/needs-2007.htm>
- The university programs have turned away 92 applicants because there was not enough money to help support them.
- Teachers seeking the supplemental TVI certificate or COMS certificate training typically do not have funds to pay for the 18+ courses they need. Most will not receive any financial compensation for the additional certificate.
- Universities have fewer federal grant opportunities and those that exist are more competitive with many disability groups competing for the same funds.
- Tuition has increased 123% at SFASU and 74% at TTU since funding began. Both expect an additional 30% increase in each of the next 2-3 years.
- At SFASU, it currently costs \$7,500 to train a TVI and \$12,000 to train an O&M. Using current tuition inflation rates, those numbers will increase to \$9,750 and \$15,600 with just one 30% increase in the Fall 08. Fall 09 would be \$12,675 and \$20,280.
- At TTU, the projected cost for 2009 would be \$8,600 for tuition and \$1,500 for textbooks for a TVI student, for a total of \$10,100; and \$13,100 for tuition and \$1,500 for textbooks for an O&M student, for a total of \$14,600.
- Program cuts to maximize student stipends include: two faculty positions, .5 clerical position, adjunct faculty for practicum supervision, faculty travel, faculty conference travel, paid facilitators for Braille classes, faculty pay raises, textbook support, etc.
- Programs do not have the up-to-date assistive technology devices such as CCTVs, low vision devices, GPSs, electronic braille notetakers, computer screen reader software, etc., to train the teachers who must teach these skills to their students who are dependent on them for accessibility.
- The cuts have impacted quality and quantity of practicum support as indicated on program evaluations

### **Problems—Mentor Program**

- Even the best university program cannot address all of competencies to educate children from birth to 22 years, whose abilities range from gifted and talented to those with severe cognitive impairments, with single or multiple disabilities, or even deafblindness. And the etiologies and severity of the visual disability is extremely variable.
- TVIs and COMS typically work in isolation, without the benefit of others to guide and mentor them during the first years of their assignment.
- With the grant funds, TSBVI has developed a statewide mentoring program to provide initial support to new TVIs and COMS, and those in training programs (see <http://www.tsbvi.edu/pds/mentors.htm> ). Once selected and trained, mentors and protégés come to Austin to observe children and master teachers that are not available locally.
- Currently there is only one training a year, for the mentors –in Austin. This has not accommodated training needs for the panhandle, far west Texas, and far south Texas, where there are shortages. There is no follow-up training for the mentors.



- Currently, there are 201 TVI mentors, 102 COM mentors, and 52 who have both certifications.
- There are 173 protégés assigned to mentors, and 34 who are not yet assigned.

**Financial Support Needed**

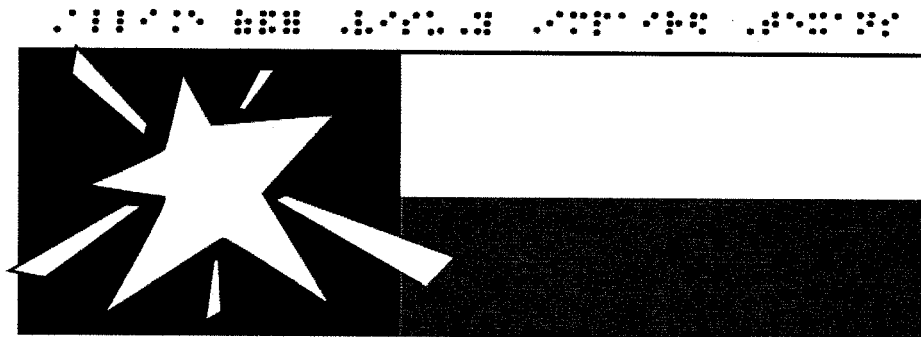
- Allocation
  - \$ 900,000 Current Allocation
  - \$ 200,000 Increase for TTU
  - \$ 200,000 Increase for SFASU
  - \$ 100,000 Increase for Mentor Program @ TSBVI
  - \$1,400,000 Total Allocation**
- Additional funding will:
  - (For University Programs)
    - provide more stipends to support increased numbers of TVI and COM students in the programs
    - allow more courses to be offered during the year, including the summer, so students can finish faster.
    - provide up-to-date assistive technology for training
    - adjunct faculty for O&M and for practicum supervision
  - (For the Mentor Program)
    - Increase the supply of mentors in the areas of Texas that are in the far reaches of the state by providing training where there are shortages.
    - Provide ongoing training for mentors at cluster sites and at preconference events.
    - Provide attendee travel and lodging for the extra days of training.
    - Provide basic resources (books) that mentors should have to support their activities with protégés.

For the first two years, the programs were new, and the numbers of applicants were manageable. As administrators and potential students realized the merits of the program, applications increased. By cutting programming costs and increasing the dollars spent on stipends the following two years, the increased numbers were supported. But, tightening the belt even further was not enough to counter the tuition increases. The number of students in the program over the last two years decreased. Practicum students do not get the same level of supervision now that they once received. This makes their new positions as TVIs more stressful, and they all feel they need more supervision and have stated this repeatedly on course evaluations. This leads to an even greater need for a strong mentor program.

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*Alliance of and for Visually Impaired Texans*

**Legislative Proposal**  
**Require an Orientation and Mobility (O&M) Evaluation**  
**for**  
**All Students with a Visual Impairment or Deafblindness in Texas**

**What is Orientation and Mobility (O&M)?**

- O&M is a related service specific to students who are blind or visually impaired [Individuals with Disabilities Education Act 2004 (IDEA)].
- O&M teaches these students how to safely move in the environment and to know where they are going.
- Some examples of O&M instruction include:
  - Learning to use the long cane to detect steps, curbs, & obstacles;
  - Using remaining vision efficiently for travel in a wheelchair;
  - Learning to ride a bus independently;
  - Learning to use sound cues to cross a street safely;
  - Learning to use environmental cues to remain oriented to a route;
  - Using optical devices for distance viewing;
  - Developing motor skills and concepts in infants to use for purposeful movement; and,
  - Learning to move independently at home, in school, and in the community.
- O&M skills are the foundation for independence and success as an adult.
- O&M services are critical for most children with visual impairments at various points during their school career.
- Infants and toddlers, school-age children, children with multiple disabilities, children who are deafblind, those who are blind, and those with low vision all need O&M services.
- O&M is provided to children in public schools by Certified Orientation and Mobility Specialists (COMS<sup>®</sup>) who have completed an accredited university degree in orientation and mobility and who are certified through the national Academy for Certification of Vision Rehabilitation and Education Professionals.

**Current Situation in Texas**

- There are 7,967 children with visual impairments (from birth to 21 years).
- Children from birth to three years old are served jointly by local school districts and the Early Childhood Intervention (ECI) Program. Districts are responsible for the O&M services.
- Children, ages 3-21 are served by local school districts.

- Only 2,293 of 7,967 (28.7%) children with visual impairments are receiving O&M services!
- Only 3,615 of 7,967 (45.4%) have received an O&M evaluation within the past three years.
- Only 40% of the 3,119 students with additional disabilities have received an O&M evaluation within the past three years.
- Only 50% of the 552 students with deafblindness have received an O&M evaluation within the past three years, and only 33% are receiving O&M services.
- Only 40.5% of children under the age of five have received an O&M evaluation within the past three years.

### **Problem**

- Although numerous special education laws, regulations, and rules address comprehensive evaluations, ARD committees typically have insufficient information to determine when to refer the student for an O&M evaluation. Legal generalities do not work for this specialized and unique area.
- TEC 30.002(e) requires IEPs to provide a detailed description of the arrangements made to provide the student with orientation and mobility training, but still too many students are not evaluated for the service.
- Current TEA special education rules require that the comprehensive evaluation of students evaluated for special education as a student with a visual impairment or deafblindness includes an eye doctor evaluation, a functional vision evaluation (FVE), and a learning media assessment—but not an O&M evaluation.
- The FVE, usually administered by a teacher of students with visual impairments (TVI), must address the need for an O&M evaluation. However, many TVIs, without training or expertise, (or freedom), often make inappropriate recommendations.
- Parents seldom are aware of the scope or benefits of O&M instruction for their children, so may not advocate for it.
- School administrators and other special educators are typically unfamiliar with the service or are unduly influenced by cost or convenience to provide it.
- There is a common—but devastating—misconception that very young children, students with multiple disabilities/deafblindness, and those with low vision will not benefit from O&M instruction.
- All children may not need O&M instruction every year, but most will need it at some point.

### **Solution:**

- Amend TEC §30.002 to require that an orientation and mobility evaluation by a Certified Orientation and Mobility Specialist (COMS®) be a part of the initial full and individual evaluation for every student considered for eligibility for special education as visually impaired or deafblind.
- For a students with a visual impairment or deafblindness require a COMS® to be a member of the multidisciplinary team that collects or reviews evaluation data in connection with the determination of a student's eligibility. [See TAC 89.1040(b)(2) and (c)(12)]
- Require that the O&M evaluation address O&M needs in a variety of environments (home, school, community), situations (day, night), and in unfamiliar settings.
- OR—require that TEA amend Commissioner Rules for Special Education accordingly.

### **Impact of Requiring O&M Evaluations**

- More students currently not considered due to age or additional disabilities will receive O&M evaluations and services

- More students with low vision, who may function adequately in familiar environments, but have difficulty in unfamiliar or poorly lit environments or at night, will receive evaluations and services.
- More students will receive earlier access to O&M services, increasing their independence in their home, school, and communities, reducing the need for other costly supports.
- Knowledge of the scope and benefits of O&M services will increase for both parents and school personnel.
- Students who are proficient, independent travelers are more likely to become confident, independent, successful adults.

### **Fiscal Impact**

- Over 75% of the 736 districts with students with visual impairments have less than 10 students with visual impairments.
- An estimated 1,400 additional students will need evaluations each year during the 3-year period following implementation of required O&M evaluations. At an average of \$300 per evaluation, the resulting cost should be easily absorbed by most local ECI and district budgets.
- Not all students with visual impairments who are evaluated will need O&M services. Needs will vary over the course of the student's life and must be tailored to individual age-appropriate travel environments.
- Early O&M instruction alleviates many of the motor and travel problems that result when students go without services (e.g., gait and posture problems, fear of movement, self-taught methods that may be inefficient and unsafe, personal safety issues, etc.), and may reduce the need for other related services or paraprofessionals.
- Texas will save money over time because there will be less need for O&M services from adult rehabilitation programs when these students become adults. The students will have obtained the skills needed for independent travel during their public school years making them better prepared to enter the world of work and become tax-paying citizens.
- Any cost increases are simply a result of bringing Texas into compliance with the IDEA.

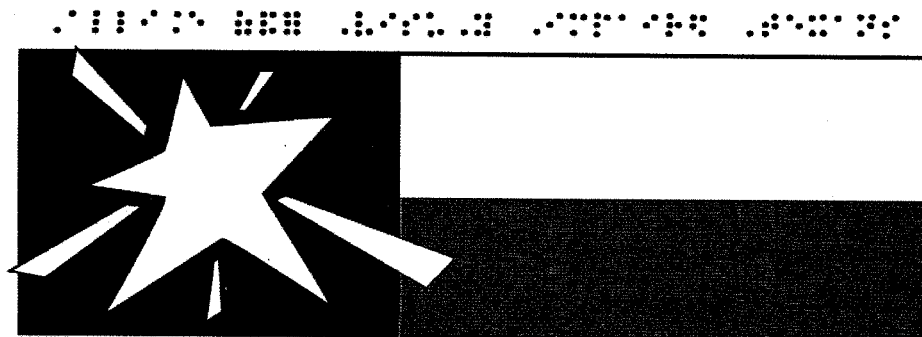
### **Relevant Legal Citations**

- **TEC 30.002 Education of Children with Visual Impairments**
- **Texas Administrative Code (TAC) Title 19, Chapter 89. Adaptations for Special Populations, Subchapter AA: Commissioner's Rules Concerning Special Education Services**  
89.1040(b)(2)  
89.1040 (c)(12) *Eligibility Criteria: Visual impairment.*  
§89.1131(e). *Qualifications of Special Education, Related Service, and Paraprofessional Personnel*
- **Individuals With Disabilities Education Act (2004)**  
§300.34 *Related Services*

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*Alliance of and for Visually Impaired Texans*

**LEGISLATIVE PROPOSAL**

**TO**

**EXCLUDE TEACHERS OF STUDENTS WITH VISUAL IMPAIRMENTS (TVIs)**  
**FROM CERTIFICATION BASED ONLY ON EXAMINATION**

**Background:**

Currently, in Texas, teachers of students with visual impairments (TVIs) are able to obtain the Supplemental Visual Impairment Certification through several routes. They can either complete an approved university preparation program or an approved alternative certification program and pass two TExES exams: one in Braille and one in Visual Impairment; or they can bypass any or all of the essential coursework and just take the two TExES exams. If they are able to pass these exams at the required level, they can become fully certified TVIs.

The 8,000 infants, children, and young adults with visual impairments in Texas must develop a myriad of unique skills to compensate for their visual loss to be safe, independent, and educationally successful. They need teachers highly trained in the area of visual impairments—TVIs—to evaluate their individual needs and teach them these skills. They need competent TVIs to modify the school environment to reduce physical dangers and increase opportunities for independence. A proficient TVI is the child's bridge between a bright future and no future.

TVIs provide specialized instruction such as Braille reading and writing, Nemeth math code, use of low vision devices, basic orientation and mobility (getting around in the environment), complex assistive technology, social skills, daily living skills, tactile learning, concept development, etc. Students with visual impairments typically receive their core instruction in the general education classroom or in a

special education classroom from regular and other special educators. These professionals depend on the TVI's guidance to adapt their visually-based teaching strategies to ones that will have meaning when vision is limited or absent. The TVI ensures that specially adapted materials, such as braille or large print will be available—often by training and supervising braille transcribers and other paraprofessionals.

The special education evaluation teams rely on the expertise of the TVI for guidance in their assessment methods and tools to ensure the results are unbiased and non-discriminatory. Without this input, inappropriate evaluations result, often with a life-long negative impact. The TVI also conducts a variety of special evaluations required by law, such as a functional vision evaluation to determine how a student does and could use his vision and a learning media assessment to determine if he will need braille, large print, assistive technology, etc., for literacy and access; and evaluation of the expanded core curriculum, those specialized skill areas unique to visual impairment.

The State Board of Educator Certification (SBEC) has approved eight entry level standards with 79 knowledges and 79 applications which are not duplicated in any other teacher certification. An entry level TVI must be able to apply these to students from birth to 22 years of age; with tremendous variations of visual loss and etiologies; with or without any combination of other disabilities, including deafblindness; and a full range of cognitive abilities.

TVIs need extensive formal training by experts in the field—beyond their base teaching certificate—to gain just a minimal level of skills sufficient to begin to serve this diverse group of children without causing harm. Texas Tech University, Stephen F. Austin University, and the Region II Alternative Certification Program address these entry-level competencies through rigorous coursework, practica, and internships, designed to provide the foundation and specialized knowledge base for a life-long professional journey towards expertise.

The current option of certification-based-on-examination only circumvents this essential professional development path, leaving children who are already vulnerable because of their limited vision, even more at-risk. Passing the required Visually Impaired TExES exam and the Braille TExES exam indicates that a teacher has some knowledge of a tiny sample of the approved standards (or that the person guesses well on tests!) Successful completion of approved coursework that addresses all of the standards in depth PLUS passing the TExES exams are much better indicators of entry-level success. (Would we choose a doctor who passed the boards but did not finish medical school?)

### **Consequences of Low Certification Requirements**

A real danger of a system that may inadvertently perpetuate unprepared TVIs is that their incompetence may go unrecognized. Because supervisors and administrators seldom have experience with this population, they may be forced to unknowingly trust in the integrity of the certification and accept any practices of the TVI without question. In fact, a recent survey of supervisors of TVIs indicated that 24% did not even know how the TVIs they supervised became certified, and only 16% were trained in the area of visual impairment themselves. Because of the low incidence of blindness, children and their teachers are typically isolated geographically from other TVIs. This precludes on-the-job mentoring and quick correction of errors. Life-altering decisions can be made by an unknowledgeable TVI, such as deciding not to introduce a student to Braille as his literacy medium when he really needs it, resulting in poor literacy skills for a lifetime. A single TVI, who, because of inadequate training, has limited knowledge of the full spectrum of possibilities and resources, may send many children, their families, and entire school districts on a downward spiral of low expectations and minimal services, resulting in poor performance and the need for adult services, at additional taxpayer expense, after graduation.

### **Data and Survey Results**

From 2002-2007, of the 174 teachers who started the TVI program at Texas Tech University, 25 (14%) obtained the supplemental certification by exam without completing the coursework

A survey of the regional education service centers asked about the success of those TVIs who were certified via the examination-only route. A sample of responses included the following: "The person had no knowledge. The ESC is always trying to clean up his mistakes." "We had several, and they were unprepared in basic ways." "Of two, one has no info, needs LOTS of help, but at least asks for help. The other presumes that coursework isn't needed but really doesn't know what he's doing." "Because they do not know what they do not know, they are led by administrators to dilute the process, to shortcut the assessments, to deny services to students. Administrators, I hope, are not doing this knowingly, or maliciously, but out of ignorance."

Of the 46 states that responded to a national survey of TVI certification requirements, 80% require testing plus completion of approved coursework or just completion of approved coursework. Only

two other states besides Texas were found to allow certification by examination only for this specialized field: Mississippi and Oklahoma.

**Solution:**

**Protect the children of Texas who are blind and visually impaired by raising the standard for Texas. An unprepared, but "certified" TVI does not meet the requirements of federal and state regulations for special education. Pass legislation that prevents teachers of students with visual impairments from being certified simply by passing the required exams. Mandate that all TVIs must complete the SBEC-approved essential coursework before taking the TExES in Visual Impairment and before becoming certified.**

***TAC §230.437 Issuance of Certificates Based on Examination***

*General provisions.*

*A teacher who holds a valid provisional, professional, or standard classroom teaching certificate or a valid temporary classroom teaching certificate issued under the provisions of Subchapter O of this chapter (relating to Texas Educator Certificates Based on Certification and College Credentials from Other States or Territories of the United States), or Chapter 245 of this title (relating to Certification of Educators from Other Countries), and a bachelor's degree may qualify for an additional teaching field or certification to teach at another level by passing the appropriate certification examination(s) for that subject. The rule shall not be used to qualify a classroom teacher for:*

- 1) *initial certification;*
- 2) *career and technology certification based on skill and experience;*
- 3) *teacher of students with visual impairments supplemental certification*
- 3 4) *another class of certificate, as listed in 19 TAC Chapter 232, Subchapter M, of this title (relating to Types and Classes of Certificates);*
- 4-5) *certification for which no certification examination has been developed.*

**About AVIT**

The Alliance of and for Texans with Visual Impairments (AVIT) is a non-profit coalition of 26 member organizations committed to speak on behalf of children and adults with visual impairments. We include organizations of parents, consumers, educators, medical professionals, and other service providers.

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