



U.S. Department
of Veterans Affairs

NATIONAL STANDARD OF PRACTICE: BLIND REHABILITATION SPECIALIST

July 2024

PURPOSE: This report provides a summary of internal and external feedback received for the draft Blind Rehabilitation Specialist VA national standard of practice during the comment period from July to August 2022.

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Executive Summary

The Department of Veterans Affairs (VA) is establishing national standards of practice for health care professionals who have a license, certification, registration, or other state requirement. The VA national standards of practice are a standardized set of services that all health care professionals in a given occupation can perform while employed by VA if their VA medical facility performs such services and they have the proper education, training, and skill to perform the services. As part of a comprehensive development process to establish each occupation's national standard of practice, VA affords the public, Veterans, professional associations, VA employees, unions, and other interested parties the opportunity to provide feedback on the national standard of practice prior to finalization and publication in VA policy.

Blind Rehabilitation Specialists use assessments, therapies, and technologies to improve the independent function, quality of life, and adjustment to vision loss for those who are blind or visually impaired. Visual Impairment Services Team (VIST) Coordinators provide adjustment counseling, coordinate services, ensure Veterans receive benefits for which they are eligible, and conduct complex negotiations for benefits and services for Veterans who are blind or visually impaired. VA included standards for both Blind Rehabilitation Specialists and VIST Coordinators in the proposed national standard of practice.

On July 1, 2022, VA sent a letter to the Academy for Certification of Vision Rehabilitation & Education Professionals (ACVREP) to inform them of VA's intent to follow their certification standards for the national standards of practice for VA Blind Rehabilitation Specialists and VIST Coordinators and provided them with an opportunity to discuss the proposed national standards of practice with VA. In addition, from July 1 to August 30, 2022, VA posted the proposed VA national standard of practice for Blind Rehabilitation Specialists and VIST Coordinators on the Federal Register, 87 FR 39595 (<https://www.federalregister.gov/documents/2022/07/01/2022-14033/notice-of-request-for-information-on-the-department-of-veterans-affairs-blind-rehabilitation>) for public comment and within VA's intranet for VA employee comment.

The proposed national standards of practice for Blind Rehabilitation Specialists and VIST Coordinators received 61 total comments across all platforms—58 comments from VA employees and 2 comments from individuals from the public, and 1 comment from a professional association, the American Optometric Association. ACVREP did not provide any feedback to VA. VA reviewed all comments received and made four changes to the Blind Rehabilitation Specialist and VIST Coordinator national standards of practice in response to comments.

This report provides a summary of comments received on the proposed Blind Rehabilitation Specialist and VIST Coordinator national standards of practice. It also provides VA's response to the comments and changes made to the national standards of practice in response to feedback received.

Authority

Chapters 73 and 74 of title 38 of the United States Code (U.S.C.) and 38 U.S.C. 303 permit the Secretary to further regulate the Department of Veterans Affairs health care professions to make certain that VA's health care system provides safe and effective health care by qualified health care professionals to ensure the well-being of those Veterans who have borne the battle.

On November 12, 2020, VA published an interim final rule confirming that VA health care professionals may practice their health care profession consistent with the scope and requirements of their VA employment, notwithstanding any state license, registration, certification, or other state requirements that unduly interfere with their practice. 38 CFR 17.419; 85 FR 71838. Specifically, this rulemaking confirmed VA's practice of allowing VA health care professionals to deliver health care services in a state other than the health care professional's state of licensure, registration, certification, or other state requirement, thereby enhancing Veterans' access to critical VA health care services. The rulemaking also confirmed VA's authority to establish national standards of practice for its health care professionals which would standardize a health care professional's practice in all VA medical facilities, regardless of conflicting state laws, rules, regulations, or other state requirements.

The rulemaking explained that a national standard of practice describes the tasks and duties that a VA health care professional practicing in the health care profession may perform and may be permitted to undertake. Having a national standard of practice means that individuals from the same VA health care profession may provide the same type of tasks and duties regardless of the state where they are located or the state license, registration, certification, or other state requirement they hold. VA emphasized in the rulemaking and reiterates here that VA will determine, on an individual basis, that a health care professional has the proper education, training, and skills to perform the tasks and duties detailed in the national standard of practice and that they will only be able to perform such tasks and duties after they have been incorporated into the individual's privileges, scope of practice, or functional statement. The rulemaking explicitly did not create any such national standards and directed that all national standards of practice would be subsequently created via policy.

As authorized by 38 CFR 17.419, VA is developing national standards of practice via policy. There is one overarching directive to describe Veterans Health Administration (VHA) policy on national standards of practice. The directive is accessible on the VHA Publications website at: <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external). As each individual national standard of practice is finalized, it is published as an appendix to the directive and accessible at the same websites.

Purpose

It is critical that VA, the Nation's largest integrated health care system, develops national standards of practice to ensure first, that beneficiaries receive the same high-quality care regardless of where they enter the system and, second, that VA health care professionals can efficiently meet the needs of beneficiaries when practicing within the scope of their VA

employment. National standards are designed to increase beneficiaries' access to safe and effective health care, thereby improving health outcomes.

The importance of this initiative has been underscored by the coronavirus disease (COVID-19) pandemic. The increased need for mobility in VA's workforce, including through VA's Disaster Emergency Medical Personnel System, highlighted the importance of creating uniform national standards of practice to better support VA health care professionals who practice across state lines. As a national health care organization, VA often has health care professionals primarily based out of a VA medical center in one state travel to smaller community-based outpatient clinics in neighboring states to ensure access to care for Veterans.

Creating national standards of practice also promotes interoperability of medical data between VA and the Department of Defense (DoD), providing a complete picture of a veteran's health information and improving VA's delivery of health care to the Nation's veterans. DoD has historically standardized practice for certain health care professionals, and VA has closely partnered with DoD to learn from their experience.

It is also imperative that VA, as a national health care system, can recruit and retain health care professionals, to ensure there is access to health care regardless of where the Veteran resides. VA needs the flexibility to hire qualified health care professionals from any state to meet the staffing needs of a VA health care facility where recruitment or retention is difficult. This flexibility is especially beneficial in recruiting spouses of active service members who frequently move across the country and can be subject to delays in starting new employment due to needing to obtain an additional state requirement to practice in the new state.

Development Process

To develop VA's national standards of practice, VA is using a robust, interactive process that adheres to the guidelines outlined in Executive Order (EO) 13132 to preempt conflicting state laws, rules, regulations, or other requirements. All standards undergo a deliberate review process, both within VA and externally, to ensure that the draft national standard is consistent with VA's team-based approach to care, results in the highest quality of care for Veterans, is implementable on an enterprise level, and is legally supportable. The process includes consultation with internal and external stakeholders, including state licensing boards, VA employees, professional associations, Veterans Service Organizations, labor partners, and others.

For each VA occupation, a workgroup comprised of health care professionals in the identified occupation conducts research to identify internal best practices that may not be authorized under every state license, certification, or registration, but would enhance the practice and efficiency of the profession throughout VA. If a best practice is identified that is not currently authorized by every state, the workgroup determines what education, training, and skills are required to perform such task or duty. The workgroup then drafts a proposed VA national standard of practice using the data gathered during the research and incorporates internal stakeholder feedback into the standard. The workgroup may consult with internal or external stakeholders at any point throughout the process.

The proposed national standard of practice is internally reviewed, to include by an interdisciplinary workgroup consisting of representatives from Quality Management; VA medical facility Chief of Staff; Academic Affiliates; Veterans Integrated Services Network (VISN) Chief Nursing Officer; Ethics; Workforce Management and Consulting; Surgery; Credentialing and Privileging; VISN Chief Medical Officer; and Electronic Health Record Modernization.

VA has developed a robust process to engage with partners, members of the public, states, and employees on the proposed national standard of practice. In addition, the proposed national standard of practice is provided to our partners in DoD as a notification and opportunity to flag inconsistencies with DoD standards. VA provides the proposed national standard of practice to our DoD partners as an opportunity to flag inconsistencies with DoD standards. VA also engages with labor partners informally as part of a pre-decisional collaboration. Consistent with EO 13132, VA sends a letter to each state board and certifying organization or registration organization, as appropriate, which includes the proposed national standard and offers the recipient an opportunity to discuss the national standard with VA. After the state boards, certifying organizations, or registration organizations have received notification, the proposed national standard of practice is posted in the Federal Register for 60 days to obtain feedback from the public, professional associations, and any other interested parties. At the same time, the proposed national standard is posted to an internal VA site to obtain feedback from VA employees. Responses received through all vehicles—from state boards, professional associations, unions, VA employees, and any other individual or organization who provides comments via the Federal Register will be reviewed. VA will make appropriate revisions in light of the comments, including those that present evidence-based practice and alternatives that help VA meet our mission and goals. VA may also make additional changes outside the scope of the comments during its own internal review processes after the conclusion of the comment period. This document provides a summary of the comments received and VA's response to the comments.

VA Blind Rehabilitation Specialists and VIST Coordinators: Feedback on National Standards

VA Blind Rehabilitation Specialists use assessments, therapies, and technologies to improve the independent function, quality of life, and adjustment to vision loss for those who are blind or visually impaired. Blind Rehabilitation Specialists conduct evaluations through interviews, tests, and measurements and use such findings either individually or as a part of an interdisciplinary team to develop and implement blind and vision rehabilitation programs. Instructional activities are directed toward achieving therapeutic objectives for those who are blind or visually impaired. These objectives include effective communication and visual skills; instruction on optical low vision devices; orientation to and management of the environment; safe ambulation and travel; access to information through the use of assistive technologies; manual skills; proficiency and understanding in activities of daily living; pursuit of avocational and vocational skills; and education and adjustment to visual impairment. VA employs approximately 680 Blind Rehabilitation Specialists in the United States.

VA's proposed national standard of practice for Blind Rehabilitation Specialists did not propose to preempt any current state requirements and instead proposed to confirm that all Blind Rehabilitation Specialists follow one of four ACVREP certifications: Certified Low Vision Therapist (CLVT), Certified Orientation and Mobility Specialist (COMS), Certified Assistive Technology Instructional Specialist for People with Visual Impairments (CATIS), or Certified Vision Rehabilitation Therapist (CVRT). Currently, all VA Blind Rehabilitation Specialists follow ACVREP standards; therefore, there would be no change in practice for any Blind Rehabilitation Specialists in VA.

The proposed national standard of practice for Blind Rehabilitation Specialists includes a standard of practice for Visual Impairment Services Team (VIST) Coordinators. VIST Coordinators provide adjustment counseling, coordination of services, ensure adequate compensation and benefits, and conduct complex negotiations for benefits and services for Veterans who are blind or visually impaired. All VIST Coordinator positions are appointed as Blind Rehabilitation Specialists, and they provide key support for VA's blind rehabilitation services; therefore, VIST Coordinators were included in the proposed VA national standard of practice for Blind Rehabilitation Specialists. Blind Rehabilitation Specialists and VIST Coordinators have some overlapping job duties. VIST Coordinators, however, may be drawn from traditional blind/vision rehabilitation backgrounds or from counseling or social work backgrounds.

The proposed national standard of practice for VIST Coordinators proposed to confirm all VIST Coordinators must be credentialed through: any certification via the ACVREP, including CLVT, COMS, CATIS, and CVRT; license or certification by a state to independently practice social work at the master's degree level; certification via the Commission on Rehabilitation Counselor Certification, Certified Rehabilitation Counselor; or license or certification by a state to independently practice in other health care occupations. The proposed national standard of practice confirms all VA VIST Coordinators follow ACVREP standards.

On July 1, 2022, VA posted the proposed national standards of practice for Blind Rehabilitation Specialists and VIST Coordinators in the Federal Register, 87 FR 39595 (<https://www.federalregister.gov/documents/2022/07/01/2022-14033/notice-of-request-for-information-on-the-department-of-veterans-affairs-blind-rehabilitation>) and within VA's intranet for public and employee feedback, respectively. The proposed national standards of practice remained open for comment for 60 days, through August 30, 2022. A copy of the proposed national standards of practice for Blind Rehabilitation Specialists and VIST Coordinators that was posted for feedback is located in [Appendix A](#).

The Under Secretary for Health also sent a letter to ACVREP to inform it of VA's intent to follow its certification standards and provide it with an opportunity to provide feedback directly to VA. A copy of that letter is located in [Appendix B](#).

VA specifically sought feedback through the following questions:

1. *Are there any required trainings for the aforementioned practices that we should consider?*

2. *Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any state?*
3. *Is there any variance in practice that we have not listed?*
4. *What should we consider when preempting conflicting state laws, regulations, or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel?*
5. *Is there anything else you would like to share with us about these national standards of practice?*

In addition to leaving specific comments and suggestions, commenters internal to the VA could choose to provide agreement or disagreement on the proposed national standard. Agreement denotes overall acceptance of the standard while disagreement denotes that the national standard in its original form presents significant clinical, legal, or patient safety concerns. Employees could also select not applicable if the national standard did not pertain to their area of expertise.

The national standard of practice for Blind Rehabilitation Specialists and VIST Coordinators received three comments on the Federal Register, including one comment from a professional association—the American Optometric Association—and 58 comments by VA employees from the internal VA site. Out of the 58 employee comments, 44 employees *agreed*, four employees *disagreed*, and 10 employees selected *not applicable*.¹

Certification Body Feedback

On July 1, 2022, VA sent a letter to the Blind Rehabilitation Specialist certification body to inform them of VA's intent to follow their certification body standards for the national standard of practice for Blind Rehabilitation Specialists and VIST Coordinators and provided them with an opportunity to discuss the proposed national standard of practice with VA. ACVREP did not provide feedback on VA's proposed VA national standards for Blind Rehabilitation Specialists and VIST Coordinators.

Professional Association Feedback

VA received feedback from the American Optometric Association via the Federal Register.

Comment: The American Optometric Association highlighted the important role optometrists play in vision rehabilitation services, including writing, ordering, and approving treatment plans for Blind Rehabilitation Specialists with CLVT certification. They urged VA to adopt a standard that, in their view, more accurately describes the role of Blind Rehabilitation Specialists in low vision therapy as part of an interdisciplinary team with an ophthalmologist or optometrist.

Response: VA emphasizes here and in the national standard of practice that Blind Rehabilitation Specialists currently work in a team-based environment of care and each health care provider in the team contributes to the success of VA blind rehabilitation programs. While Optometrists play an important role in blind rehabilitation services, this national standard of

¹ At the time of feedback, employees were prompted to select “concur,” “concur with comments,” and “non-concur.”

practice applies to VA Blind Rehabilitation Specialists. VA Optometrists will follow a separate national standard of practice.

Feedback Across Five Areas

All commenters had the opportunity to provide responses to the five areas on which VA solicited feedback, and VA responds to any questions or concerns raised by the commenters in response to those areas below.

VA received comments from employees and individuals from the public that were supportive of the draft national standard of practice, as well as comments that were not responsive to the specific national standard of practice. VA does not further address these comments below.

“Overall, I think this is a great idea and long overdue. It is important for the validity of Blind Rehabilitation Service[s] to maintain a standardized minimum practice. – Comment from VA employee

1. Are there any required trainings for the aforementioned practices that we should consider?

Comments: Several employees commented on training requirements for VIST Coordinators. Employees were concerned that VIST Coordinators who hold a license or certification in a related discipline may not have the proper training to treat blind and visually impaired patients. They suggested that VIST Coordinators be required to obtain an ACVREP certification in addition to, or in lieu of, their other certifications or licenses, as this would enable VIST Coordinators to have knowledge of blind rehabilitation and allow them to better serve visually impaired Veterans. Alternatively, some employees suggested that VIST Coordinators be trained on how to make referrals to ACVREP-certified Blind Rehabilitation Specialists. Another individual suggested that VA allow dedicated time for VIST Coordinators to obtain additional training and that VA provide continuing education units (CEUs) for all occupations to maintain certification or licensure.

Response: VA Handbook 5005, Staffing, Part II, Appendix G41 sets the minimum training and certification requirements for VA VIST Coordinators. According to VA qualification standards, VIST Coordinators may hold one of four certifications from ACVREP: CLVT, COMS, CATIS, and CVRT; license or certification by a state to independently practice social work at the master’s degree level; certification via the Commission on Rehabilitation Counselor Certification, Certified Rehabilitation Counselor; or license or certification by a state to independently practice in other health care occupations. The national standard of practice does not change VA qualification standards. Because the practice of Blind Rehabilitation Specialists and VIST Coordinators is not changing, there will be no impact on the practice of this occupation when this national standard of practice is implemented. Per VHA Directive 1174(1), Blind and Visual Impairment Rehabilitation Continuum of Care, no national training is required for VIST Coordinators. Although VHA Directive 1174(1) does not mandate any training, VA offers VIST Coordinators robust training before starting a new position as a VIST Coordinator, which covers referrals to ACVREP-certified Blind Rehabilitation Specialists. VA also offers a VIST Coordinator continuing education series for those who are established employees. Moreover, the blind rehabilitation

programs offer competency-based cross-training programs for VIST coordinators. Lastly, VA healthcare providers, including VIST Coordinators, must follow their respective certification or licensure requirements for CEUs.

Comments: Several employees also explained that most blind rehabilitation programs provide cross-training that allow those who are not certified in one area to provide services in that area. They suggested that these individuals should be allowed to provide services in other areas than their certification if they have met the competencies to provide those services and interventions.

Response: VA agrees that Blind Rehabilitation Specialists might possess skills in areas other than the one they are certified in. VA Blind Rehabilitation Specialists who are cross-trained may practice in these other areas as long as they have the competencies and training to do so.

Comments: Some employees disagreed with the proposed national standard of practice based on their concerns about employees without certification who were grandfathered into the position of Blind Rehabilitation Specialist under the VA qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G41, and whether such employees could continue to practice at VA without a certification. In addition, some employees noted that additional training may be required for Blind Rehabilitation Specialists who do not currently have certifications from the ACVREP and were grandfathered into their position under the qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G41.

Response: As stated in VHA Directive 1900, VA National Standards of Practice, all national standards apply to employees grandfathered into their respective positions unless otherwise noted in the national standard of practice. VA has Blind Rehabilitation Specialists without certifications who were grandfathered into such positions. VA Handbook 5005, Staffing, Part II, Appendix G41 includes a grandfathering provision for employees who, on the effective date of the qualification standard (March 13, 2019), were considered to have met all qualification requirements for the title, series, and grade held, including education and registration that are part of the basic requirements of the occupation of Blind Rehabilitation Specialist. The qualification standards are not changing due to the implementation of the national standard of practice. No additional training is required for grandfathered Blind Rehabilitation Specialists as a result of such employees being grandfathered into their positions.

2. Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any state?

Comments: Several employees who disagreed with the proposed national standard of practice shared there is a lack of CATIS and CVRT-certified Blind Rehabilitation Specialists which can limit the blind rehabilitation services provided at some VA medical facilities or overburden the few Blind Rehabilitation Specialists certified in these areas, especially in the use of assistive technology. One employee suggested allowing individuals with a graduate certificate in assistive technologies to be hired as Blind Rehabilitation Specialists and perform the same duties as CATIS-certified individuals, given the shortage of CATIS-certified Blind Rehabilitation Specialists.

Response: VA's blind rehabilitation programs offer cross-training for Blind Rehabilitation Specialists in different skills, including training on assistive technology. Therefore, a Blind Rehabilitation Specialist who does not currently possess the CATIS certification can receive training on assistive technology. Cross-training helps ensure that Blind Rehabilitation Specialists are not overburdened at centers and clinics. In addition to cross-training, through increased use of virtual care, VA is able to ensure Veterans throughout the country receive necessary and appropriate blind rehabilitation care from VA Blind Rehabilitation Specialists. Regarding the suggestion that VA hire individuals with a graduate certificate in assistive technologies to perform the same duties as CATIS-certified individuals, VA emphasizes that the national standard of practice for Blind Rehabilitation Specialists does not change the VA qualification standards for Blind Rehabilitation Specialists in VA Handbook 5005, Staffing, Part II, Appendix G41, which require that Blind Rehabilitation Specialists must possess certification from ACVREP or a similar certification to practice at VA.

Comment: Employees shared that there should be a national caseload cap of 500 Veterans per coordinator so VIST Coordinators can provide quality and effective services to the growing number of Veterans with visual needs.

Response: VHA Directive 1174(1) addresses VIST roster staffing guidelines. VA medical facilities must ensure that there is sufficient staff to meet caseload demands. Caseloads are determined based on ensuring the provision of quality and effective services.

3. Is there any variance in practice that we have not listed?

Comments: VA received several comments from employees regarding equivalent certifications to ACVREP, such as the University of Alabama Birmingham's Specialty Certification in Low Vision for Occupational Therapists and the National Blindness Professionals Certification Board (NBPCB) certifications. Commenters expressed concerns over not allowing those individuals with these certifications to practice at VA and inquired into whether ACVREP certification would become mandatory for Blind Rehabilitation Specialists.

Response: The national standard of practice for Blind Rehabilitation Specialists does not change VA qualification standards for Blind Rehabilitation Specialists in VA Handbook 5005, Staffing, Part II, Appendix G41, which requires Blind Rehabilitation Specialists have a certification from ACVREP or an equivalent, closely related professional credential in special education or rehabilitation. VA added a note to the national standard of practice to clarify Blind Rehabilitation Specialists with an equivalent credential outside of ACVREP practice according to the same standards set by ACVREP and according to VHA Directive 1174(1). Alternative equivalent, closely related credentials are evaluated on a case-by-case basis.

Comments: One employee expressed concerns that a Blind Rehabilitation Specialist could inadvertently practice according to standards from the NBPCB which could conflict with ACVREP standards.

Response: The Blind Rehabilitation Specialist national standard of practice requires VA Blind Rehabilitation Specialists to practice in accordance with the standards set by ACVREP and not

NBPCB. VA Blind Rehabilitation Specialists currently practice in accordance with ACVREP standard and not NBPCB; therefore, the Blind Rehabilitation Specialist national standard of practice will not change how Blind Rehabilitation Specialists practice in VA and there should not be any confusion as to which standard should be followed. Blind Rehabilitation Specialists are responsible for practicing to their full scope outlined in VHA Directive 1174(1), Blind and Visual Impairment Rehabilitation Continuum of Care.

Comments: Several VA employees commented that there is variance between Blind Rehabilitation Specialists and Blind Rehabilitation Outpatient Specialists. They were concerned that the VA national standard of practice as written would limit the services Blind Rehabilitation Outpatient Specialists can provide, given that they are hired to be multi-disciplinary regardless of their area of certification.

Response: The Blind Rehabilitation Specialist national standard of practice will not impact how Blind Rehabilitation Outpatient Specialists practice in VA. However, to ensure clarity, VA revised the proposed national standard of practice to include a separate Blind Rehabilitation Outpatient Specialists standard of practice. Blind Rehabilitation Outpatient Specialists provide those who are blind or visually impaired inpatient and outpatient services, including orientation and mobility, communication and daily living, low vision therapy, technology and computer access, and manual skills. Blind Rehabilitation Specialists and Blind Rehabilitation Outpatient Specialists perform similar duties including, but not limited to, adjustment counseling, assessments, goal development and treatment plans, therapeutic instructions, and coordinating care for Veterans. The principal difference between a full performance Blind Rehabilitation Specialist and a full performance Blind Rehabilitation Outpatient Specialists is that full performance Blind Rehabilitation Outpatient Specialists have more autonomy and manage blind rehabilitation programs and/or caseloads. In addition, Blind Rehabilitation Outpatient Specialists require more certifications to practice pursuant to the qualification standards set forth in VA Handbook 5005, Staffing, Part II, Appendix G42. Blind Outpatient Rehabilitation Specialists are responsible for practicing to their full scope outlined in VHA Directive 1174(1), Blind and Visual Impairment Rehabilitation Continuum of Care.

4. What should we consider when preempting conflicting state laws, regulations, or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel?

Commenters did not provide any feedback regarding preempting supervision requirements; however, VA is not preempting any state supervision requirements regarding Blind Rehabilitation Specialists or VIST Coordinators.

5. Is there anything else you would like to share with us about these national standards of practice?

Comments: Several employees commented on additional services that Blind Rehabilitation Specialists can provide, including working with Veterans who have visual impairment or dysfunction due to brain injury, genetics or gene therapy, mental health services, and placing orders for consults.

Response: While VA Blind Rehabilitation Specialists may provide services to Veterans who have visual impairment or dysfunction due to brain injury, the national standard of practice for Blind Rehabilitation Specialists does not include an exhaustive list of all tasks and duties Blind Rehabilitation Specialists may perform. However, the national standard of practice does not address genetics or gene therapy because VA Blind Rehabilitation Specialists do not perform those functions.

Comments: A Veteran commented via the Federal Register to express his gratitude for the care that VA Blind Rehabilitation Specialists have provided him. In the comment, the Veteran noted that the VA Blind Rehabilitation Services team was instrumental in helping them live a full and fulfilling life in service of others.

Response: VA is pleased to hear directly from Veterans and will continue to provide the best quality of care through this national standard of practice.

Conclusion

VA considered all comments received. VA is making several changes to the Blind Rehabilitation Specialist and VIST Coordinator national standard of practice based on the reasons described above. VA added a note to the national standard of practice for Blind Rehabilitation Specialists to clarify that Blind Rehabilitation Specialists can hold a certification from ACVREP or another equivalent, closely related professional credential in special education or rehabilitation. VA Blind Rehabilitation Specialists practice according to the standards set by ACVREP and according to VHA Directive 1174(1), Blind and Visual Impairment Rehabilitation Continuum of Care. VA VIST Coordinators practice in accordance with their license or certification. VIST Coordinators who are employed as Blind Rehabilitation Specialists, Social Workers, Certified Rehabilitation Counselors, or in other health care occupations must adhere to VA's national standard of practice for that specific occupation and VHA Directive 1174(1). VA also added a note to the VIST Coordinator national standard of practice to clarify that VIST Coordinators may hold one of four certifications from ACVREP: CLVT, COMS, CATIS, and CVRT; a license or certification by a state to independently practice social work at the master's degree level; a certification via the Commission on Rehabilitation Counselor Certification, Certified Rehabilitation Counselor; or a license or certification by a state to independently practice in other health care occupations. VA added a reference to VHA Directive 1174(1) to provide more information on Blind Rehabilitation Specialist practice and to address comments on cross-training for Blind Rehabilitation Specialists.

As many VA employees asked how the Blind Rehabilitation Specialist and VIST Coordinator national standard of practice applied to Blind Rehabilitation Outpatient Specialists, VA added a new separate standard of practice for Blind Rehabilitation Outpatient Specialists and clarified that there will be no change in practice for these health care professionals.

The final national standard of practice for Blind Rehabilitation Specialists, VIST Coordinators, and Blind Rehabilitation Outpatient Specialists will be an appendix to VHA Directive 1900, VA National Standards of Practice, and accessible on VHA Publications website at <https://www.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/>

(external) once published. In accordance with VHA's national policy process, the national standards of practice for Blind Rehabilitation Specialists, VIST Coordinators, and Blind Rehabilitation Outpatient Specialists will be reviewed and recertified at minimum on a five-year cycle.

Appendix A: Draft National Standard of Practice for Blind Rehabilitation Specialists

Appendix A includes the draft national standards of practice for Blind Rehabilitation Specialists and VIST Coordinators posted in the Federal Register and within VA on July 1, 2022, for individuals to provide feedback on. The final national standards of practice for Blind Rehabilitation Specialists, VIST Coordinators, and Blind Rehabilitation Outpatient Specialists are written into VHA Directive 1900, VA National Standards of Practice, posted at <https://www.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external).

1. Blind Rehabilitation Specialists (BRSs) use assessments, therapies and technologies to improve the independent function, quality of life and adjustment for Veterans who are blind or visually impaired. BRSs evaluate Veterans through interviews, tests and measurements and use such findings either solely or as a part of an interdisciplinary team to develop and implement blind and vision rehabilitation programs for individual Veterans. Instructional activities are directed toward achieving therapeutic objectives for Veterans who are blind or visually impaired. These activities include effective communication and visual skills; instruction on optical low vision devices; orientation to and management of the environment; safe ambulation and travel; access to information through the use of assistive technologies; manual skills; proficiency and understanding in activities of daily living; pursuit of avocational and vocational skills; and education and adjustment to visual impairment.
2. BRSs in VA possess the required education and certification from the Academy for Certification of Vision Rehabilitation and Education Professionals (ACVREP) in accordance with VA qualification standards, as more specifically described in VA Handbook 5005, Staffing, Part II, Appendix G41.
3. This national standard of practice confirms Blind Rehabilitation Specialists practice in accordance with the ACVREP standards based on the certification they hold, including Certified Low Vision Therapist (CLVT), Certified Orientation and Mobility Specialist (COMS), Certified Assistive Technology Instructional Specialist for People with Visual Impairments (CATIS), and Certified Vision Rehabilitation Therapist (CVRT), available at: www.acvrep.org. As of August 2021, Blind Rehabilitation Specialists in all States follow these national certifications.

Visual Impairment Services Team Coordinators National Standard of Practice


1. Visual Impairment Services Team (VIST) Coordinators provide adjustment counseling, coordination of services, assure adequate compensation and benefits and conduct complex negotiations with the medical and benefit systems as well as non-VA service delivery systems for Veterans who are blind or visually impaired.

2. There is no national or State license or certification for VIST Coordinators; therefore, there is no variance with a State in the standard of practice for VIST Coordinators. VA VIST Coordinators must be licensed, certified, or registered as BRSs, Social Workers, Certified Rehabilitation Counselors, or other health care professionals as outlined in VA Handbook 5005, Staffing, Part II, Appendix G41. More specifically, VIST Coordinators must be credentialed or certified through:

- a. Any certification via the ACVREP, including CLVT, COMS, CATIS, and CVRT;
- b. License or certification by a state to independently practice social work at the master's degree level;
- c. Certification via the Commission on Rehabilitation Counselor Certification, Certified Rehabilitation Counselor; or
- d. License or certification by a State to independently practice in other health care occupations.

3. VIST Coordinators licensed, certified, or registered as Blind Rehabilitation Specialists, Social Workers, and Certified Rehabilitation Counselors, or in other health care occupations, must adhere to the VA national standard of practice for that specific occupation.

Appendix B: VA Under Secretary of Health Letter

Letter	Organization	Responded to VA as of July 2024*
 Letter from Dpt of Veterans Affairs to AC	Academy for Certification of Vision Rehabilitation & Education Professionals	No

***VA reviewed all comments received and made appropriate revisions to the VA standard of practice for Blind Rehabilitation Specialists, VIST Coordinators, and Blind Rehabilitation Outpatient Specialists in light of the comments, to include those that help VA meet its mission and goals through evidence-based practice and alternatives. This final report is a collective response to all comments; however, VA will continue to actively engage with states.**