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January 30, 2025

Academy for Certification of Vision Rehabilitation & Education Professionals

Kathleen Zeider, President

4380 N. Campbell Ave., Suite #200  
Tucson, AZ 85718

Dear Ms. Kathleen Zeider:

The American Council of the Blind (ACB) appreciates the opportunity to submit comments on the Proposed Certification of Occupational Therapists as Vision Rehabilitation Providers under ACVREP of the proposal. Below are our comments on several different sections.

The American Council of the Blind is the nation’s leading member-driven organization of and for individuals who are blind or low vision. Founded in 1961 and comprised of thousands of members and 66 state and special-interest affiliate organizations, ACB strives to increase the independence, security, equality of opportunity, and to improve the quality of life of all individuals who are blind or experiencing vision loss.

The proposed certification of occupational therapists as vision rehabilitation providers (CVROT) under the Academy for Certification of Vision Rehabilitation & Education Professionals (ACVREP) has sparked significant debate and concern within the blind and low vision community of ACB. We recognize the increasing role OTs often play in addressing the needs of individuals who are losing their vision, particularly as a result of the aging process. By obtaining the proposed certification, OTs would be officially recognized for their expertise in vision rehabilitation, thereby potentially creating more availability of services for this rapidly increasing population of blind and low-vision individuals. This is particularly important in underserved areas where there may be a shortage of specialized vision rehabilitation providers.

In reviewing the proposed ACVREP certification for occupational therapists, we strongly encourage ACVREP to address the following concerns before considering adoption: Scope of Practice; Demonstration of training and expertise; and consumer involvement in the certification development.

Scope of Practice:

One of our primary concerns is the significant overlap in the proposed scope of practice between CVROTs and existing vision rehabilitation professionals. The proposed CVROT scope of practice includes every element of the certification for assistive technology specialists and low vision specialists. Additionally, the CVROT scope of practice appears to include everything covered under the O&M certification except long cane travel, and everything covered under the rehab therapist designation except teaching contracted braille.

In real life we know that there is significant overlap in the scope of the vision rehabilitation and OT professions, that practitioners are sometimes called upon to provide services beyond the scope of their certification, and that many providers work in environments that lend themselves to advanced skill development in one or more areas. For certification, however, ACB believes that ACVREP must establish clear guidelines delineating the roles and responsibilities of CVROTs and other vision rehabilitation professionals to minimize overlap and confusion and to assure that the scope of practice aligns with the knowledge requirements. Blurring the distinct professional identities of certified vision rehabilitation practitioners will likely lead to challenges in maintaining the unique contributions and expertise of each profession.

We are also concerned that consultation and collaboration are not emphasized as crucial in the success of providing vision rehabilitation services. Each section notes that referrals and consultation should occur appropriately, but we strongly believe there must be greater emphasis on consultation and collaboration with other vision rehabilitation providers. This becomes even more essential once steps are taken to clearly identify the scope of practice for CVROTs.

Training and Expertise:

ACB believes that it has been adequately demonstrated that the specialized training receive by vision rehabilitation professionals is crucial for addressing the unique challenges faced by blind and low-vision individuals. We are concerned that despite certification, OTs may not have the same depth of expertise in vision rehabilitation as those who have undergone dedicated training unless certification requirements closely parallel the unique curriculum offered to other certified vision rehabilitation providers.

We understand the concern with using the term “internship” as it relates to the OT training programs, but we believe the concept of mentoring is generally understood to be less formal and less evaluative. We therefore recommend a more structured “internship” to ensure that training meets the requirements of the scope of practice.

In addition to a CVROT, we believe the “internship” supervision should also come from one or more certified vision rehabilitation specialists. This seems especially advantageous since the proposed “internship” is relatively short and potentially very diverse.

Consumer Involvement:

In 2023, ACB adopted Resolution 23-16 expressing extreme concern over the lack of consumer involvement in development of the CVROT. ACB appreciates the opportunity to have a representative on the advisory panel which conducted the first review of the proposed standards. It should be noted that all of the concerns addressed in this document were also expressed during meetings between the advisory panel and the subject matter expert panel and are still not satisfactorily resolved from the consumer perspective.

ACB is also deeply concerned that, except for this final comment period, there has been no opportunity for input by consumers into this process or no opportunity for consumers to gain a clear understanding of the complexities, opportunities and challenges arising from this proposed certification.

ACB believes that ACVREP is the best entity and has the most appropriate framework in place to develop this certification. We look forward to continued collaboration on this project with the hope that the final product will benefit consumers who are blind or have low vision and will increase opportunities for vision rehabilitation professionals. If you have any questions, please reach out to Claire Stanley, Director of Advocacy and Governmental Affairs, at [cstanley@acb.org](mailto:cstanley@acb.org).

Sincerely,

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Description automatically generated

Deb Cook Lewis

President