Before the
Federal Communications Commission
Washington, D.C. 20554
In the Matter of
Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, Section 105, Relay Services for Deaf-Blind Individuals

CG Docket No. 10-210
Comments of Keystone Systems, Inc.

July 27, 2015

Keystone Systems, Inc. appreciates the opportunity to provide comments on the National Deaf-Blind Equipment Distribution Program (NDBEDP). Keystone has worked with Perkins over the past three years to provide the database used to track activities in 34 states for the NDBEDP. We submit these comments in response to the Notice of Proposed Rulemaking (NPRM) adopted on May 21, 2015.

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III. PROGRAM STRUCTURE

F. NDBEDP Centralized Database for Reporting and Reimbursement

28. In the Permanent NDBEDP PN, the Bureau sought comment on the advantages of adopting a centralized web-based system for generating reimbursement claims and reports that are required from state programs. Under the NDBEDP pilot program, state programs must submit reimbursement claims that include the costs of equipment and related expenses (including maintenance, repairs, warranties, refurbishing, upgrading, and replacing equipment distributed to consumers); assessments; equipment installation and consumer training; loaner equipment; state outreach efforts; and program administration. Under our current rules, state programs must also report to the Commission information about equipment recipients and the people attesting that those individuals are deaf-blind; the equipment distributed; the cost, time and other resources allocated to various activities (outreach, assessment, installation, training, and maintaining, repairing, and refurbishing equipment); the amount of time between assessment and equipment delivery; the types of state outreach undertaken; the nature of equipment upgrades; a summary of equipment requests denied and complaints received; and the number of qualified applicants on waiting lists to receive equipment. As such, much of the data needed to generate reimbursement claims is also required to generate the required reports.

29. In its comments, Perkins notes that it currently has a database that is used by 32 state programs to generate reimbursement claims and the reports required by the Commission. Perkins has also been able to compile reports from the aggregated data provided by those 32 state programs. By contrast, we note that reports from state programs that have not used this database have been presented to the Commission with inconsistent formatting, making aggregation of their data by the NDBEDP Administrator difficult and inefficient.

Keystone Systems builds a database application that is used by agencies providing K-12 textbooks for children that need them in alternate formats (braille, electronic files, or large type). At the beginning of the pilot for the NDBEDP we partnered with Perkins to determine how we might be able to help them track the services and orders for the program. We saw that there were many parallels between the mode of operation of the agencies we typically work with, and the workflow that would be required for the NDBEDP. We added some customized capabilities to our existing system, and through Perkins have been providing access to our database application to a peak of 35 state programs of the NDBEDP. Our database now tracks consumers; eligibility verification; assessment, training and outreach services; equipment requests and orders/acquisitions, and repairs. From our system, certified entities can produce reports for both the FCC and reimbursement. It has been quite the journey of defining and refining workflows, analyzing and re-adjusting to meet user expectations, and interpreting and translating from one agency to another. Through the pilot project, we have gained much experience in the wide range of workflows and methods of operation that different agencies have adopted for themselves.

At Keystone, we have worked very hard during the pilot period to understand the operational and reporting needs of the state programs. We certainly agree that a national database will allow for much more consistent collection of data, and far easier and more standardized reporting. We would advise that the data to be collected be well defined and unambiguous as possible, recording specific transactions rather than summary counts. By recording a fine-grained detail of activities and expenses, it will provide for both the insights that program administrators need to see trends and better manage their programs, while still allowing the database to automatically provide consistent aggregation and roll-up of information into statewide and nationwide summaries.

30. We propose that a centralized national database be created to assist state programs in the generation of their reports to the Commission, to enable the submission of those reports electronically to the NDBEDP Administrator, and to allow for the aggregation and analysis of nationwide data on the NDBEDP. Commenters generally support the creation of such a database, with many suggesting that this is likely to lead to the more efficient generation of state reports. To ensure that all of the information collected can be aggregated and analyzed for the effective and efficient operation of the NDBEDP, we further propose that, if we adopt this approach, all certified programs be required to use the centralized database for their reporting obligations. We believe that requiring certified programs to submit data uniformly through a web-based interface provided by a centralized database will allow the Commission to identify program trends that will enable improved oversight and implementation of the NDBEDP. We seek comment on these proposals. Do NDBEDP stakeholders agree that these advantages would accrue from utilizing a centralized database? We also seek comment generally on the costs and any other benefits or disadvantages that would be associated with both the establishment and maintenance of such a database. Further, we seek comment on any lessons learned from other experiences setting up databases and whether a centralized database could be used for other purposes or programs.

We agree that a national database would make the generation of the needed reports more efficient and effective. From our experience over the past 3 years, we have a number of lessons learned:

Separate reporting needs from data collection requirements

- One of the major lessons learned was the need to present state partners and trainers with categories that matched what they perceived as their activities and expenses, and then allow the database to aggregate the costs according to the stated categories. For example, trainers think in terms of mileage, parking, tolls, etc for their assigned tasks, and don't want to have to consider how travel for an assessment will be reported differently than travel to provide training.

  We have noted in a number of the national calls that some states struggle with this same issue of being able to properly record and categorize expenses. A trainer who is entering in hours, mileage costs, and activities shouldn't be concerned with what category it will appear in the reimbursement report. They need to be able to enter

the expenses for a particular task, and have the computer system be able to generate the necessary reports.

We have a mechanism for being able to have the user enter the information in the way that makes sense to them, and map that information to the proper lines of the reports. We feel that this was an important step in our learning from the early pilot period, and would recommend something similar be used to help facilitate data entry in the national database.

- Further, our experience is that if a category has several things listed for what is to be included, only the first or second will be noticed. As an example, RLSA line 26 has a description of "*Development and maintenance of an accessible program website, formats for the public or applicants, such as flyers, application, forms, public service announcements, advertisements & press releases*." For the first couple of reporting cycles we found that people would add an activity under line 25 "*Development of program information*" and make a note that it was for an ad or press release – they assumed that line 26 was only related to website activity. Our solution was to track a list of 'activities' and their costs, and allow the system to follow rules on how to aggregate the activities into the proper reporting category. We simply added an activity to our database for "Advertising", which allowed the state programs to clearly understand how to enter those costs. The database reporting knew to aggregate that activity under the proper line of the RLSA report.

Simplify data entry

- State programs that were able to stay on top of the data entry were able to run much more efficiently and found the generation of reports to be quite simple.

- One of the most time consuming activities remains the matching of invoices to services and labeling of those invoices for RLSA use. We would propose that additional steps should be taken to simplify the record keeping process. We suggest that an app be considered for assessors/trainers that would allow entry of assessments and training notes quickly and easily. It should also allow for entry of costs related to the work performed, and even could allow for capturing an image of receipts, invoices, and packing slip information for equipment that was provided.

Data Management for equipment data is crucial.

- We have been asked to analyze equipment expenses by data points such as type/ function and manufacturer – these reports were possible because we had a normalized table of models to work from.

- With the different hardware options that are available, and the constant change as manufacturers provide new models/versions and discontinue older models, it is crucial that the information in the database be well maintained.

- The current data structures tracked for equipment via the FCC and reimbursement result in considerable variability in the quality of data that is provided – this was especially evident when trying to reconstruct what equipment was provided to a consumer by a program that had relinquished its certification.

- Without proper data management, nationally aggregated reports will be much more difficult to decipher, as there could be multiple entries for the same version of hardware.

31. Because the data needed to generate the required reports and reimbursement claims overlap, we also propose that the centralized database be available to assist state programs in generating their reimbursement claims for submission to the TRS Fund Administrator. We seek comment on this proposal. Many commenters suggest that use of a centralized database to generate reimbursement claims is likely to lead to faster reimbursement. Does this reflect the experience of other entities seeking reimbursement, and would having the centralized database available to generate reimbursement claims benefit state programs in other ways? We note that the TRS Fund Administrator is currently able to aggregate reimbursement claim data, even in the absence of a centralized database. For this reason, we propose to enable and permit, but not require, certified programs to use the centralized database to generate reimbursement claims. Alternatively, would requiring all certified programs to use the centralized database for their claims make the process of aggregating reimbursement claim data more efficient? Could reimbursement claim data be transmitted electronically from the centralized database to the TRS Fund Administrator, along with the necessary supporting documentation? We seek comment on the costs and benefits of utilizing the centralized database to facilitate the creation of reimbursement claims, as well as the best approach for utilizing this database to ensure the effective and efficient oversight of the permanent NDBEDP.

We would recommend a database system that can track all the necessary information for the FCC and reimbursement reporting (including images of invoices and such documentation) and allow reports to be electronically built and submitted.

- Regardless of the final disposition of a national database, we would recommend that the reporting standards between the FCC and reimbursement reports be reviewed and be made consistent. When working with states to prepare their reports, one of the quick checks often is to see if the top level categories matched. However, they always had to remember the Equipment is different. In the FCC report "Maintenance & Repair" is a top level category, in the reimbursement report it forms two lines under the Equipment category. Another example, in the FCC report Assessments breakdown into 3 categories of expense, in reimbursement they break into 5 categories of expense.

- In our experience of working with state programs, the reporting was quite simple and straight forward when the data was all managed within the same system. It would be even simpler if the database were to also manage images of the supporting documentation that needs to be included in a report.

- When a state program would choose to manage their reimbursement data outside of our system, data inconsistency became a problem. If the reconciliation of data is not done carefully, it can easily introduce errors and omissions into the reporting process.

32. We also seek comment about the type of data that state programs should be required to input into a centralized database. In order for state programs to generate reimbursement claims under the pilot NDBEDP, they must submit the costs of equipment and related expenses; assessments; equipment installation and consumer training; loaner equipment; state outreach efforts; and program administration. Should this same data be entered into the database? Are there other types of data that should be populated into the database for the purpose of generating reimbursement claims? Similarly, what data should be input by state programs to the database to effectively generate reports about state program activities? Under our current rules, state programs must report to the Commission information about equipment recipients and the people attesting that those individuals are deaf-blind; the equipment distributed; the cost, time and other resources allocated to various activities; the amount of time between assessment and equipment delivery; the types of state outreach undertaken; the nature of equipment upgrades; a summary of equipment requests denied and complaints received; and the number of qualified applicants on waiting lists to receive equipment. To the extent that the Commission continues requiring that such data be reported in the permanent NDBEDP, should certified programs be required to input all of this data into the centralized database?

In our experience in supporting state programs, we have identified a number of data elements that if collected consistently would help to improve the picture of the population served and how they are served. These include:

Data to determine the population reached and efficacy of outreach. We also feel that knowing these elements about the population in a given state will help for planning purposes such as to identify needs related to trainers and services such as translators.

- Language(s) used
- Age
- Communication Skills and preferences
- Braille usage and fluency level
- Referral source

Data that supports measures of program efficiency and efficacy

- Milestone dates to use in determining the length of time for service, ex. Data of first contact, date application accepted / verified, date of assessment completion, date equipment ordered, date equipment delivered, date training started and date completed.
  We note that some states do not put in consumer information until an assessment has been completed and they are ready to order equipment (with the side benefit of shortening the time a consumer is "waiting" for equipment). Since the determination of consumer eligibility is part of the reimbursable activity of this program – a policy where potential consumers are entered as soon as they are identified and contact activity related to the determination of eligibility and scheduling of sessions will provide support for the programs in the event of a consumer complaint.

- Measures of connectivity and quality of life taken at the time of initial assessment and at the completion of training – if speed of service and cost containment are important measures of how a program is performing, equally important is a measure of the effect the program has had on the consumer.

- Waiting lists / ability to flag records that have delays in service and the reason for that delay. Initially there was much discussion about what constitutes a waiting list. Some common reasons for delays include – no service provider available for the consumer's geographical area, consumer is not available due to health or other issues, and lack of funds. Each of these delays tells a different story and suggests a different remedy.

Data structures that support consistent equipment information – in the pilot rules *§ 64.610(g)(1)(iii) - for each piece of equipment distributed, its name, serial number, brand, function, and cost, the type of communications service with which it is used, and the type of relay service it can access*. The following are some observations that we have made regarding tracking of this sort of information:

Information that's different from item to item:

- Serial numbers – The requirements need to be refined for serial numbers. For example, when should serial numbers be required, and when is it acceptable that no serial number is provided? Some vendors provide serial numbers on invoices making it easier to track and verify information, others such as amplified phone require visual confirmation against the unit itself. Are there classes of equipment that should always have one, or is there a dollar amount for a piece of equipment that should trigger a required entry for a serial number?

Information that's consistent across all items of the same model:
In general we have seen a lot of inconsistency in how this information is managed. We feel that it is important that all the data elements describing a model of equipment be consistent and normalized.

- Name – This is a very subjective and varied data element as currently populated, we have seen everything from ordering level descriptors (manufacturer's model number or part number or vendor SKU) versus human readable information.
  We would recommend separate data elements for tracking the 'name' versus the model number, part number, SKU, etc.

- Relay Service –We would request clarification on the goal of this data element. For example, a laptop or smart phone could be used with VRS, IP, or IPCTS with the addition of apps but cannot use the services directly out of the box. Also, just because a phone **could** use VRS does not mean that a non-signing consumer would use that service. Is the intent of this data element to track potential usages of Relay, or just what equipment has the potential to do so?

- Communication Service – similar to Relay just because a phone could be used for email will the consumer use it that way. Is the interest in tracking usage or capability? Another potential is tracking of which carriers are mobile carriers are selected as part of the program.

- Brand, Function –These elements simply need to have their data normalized for consistency. Much of the observed inconsistency in these fields was due to misspellings, missing data, or variations in data entry, ex. A keyboard's function was variously described as an accessory, keyboard, and "blank". A normalized list of models helps with this consistency but is also work to maintain and needs to consider other variations in models such as color and capacity.

33. Should certain data be excluded from the centralized database, and if so, why? For example, would it be more appropriate for state programs to maintain records of names and addresses of their equipment recipients, along with the identity of the people who attest that those recipients are deafblind, rather than put this information into a centralized location, because of privacy concerns? Should individuals who receive equipment instead be given a unique identifying number, which could be entered into the database in lieu of their names and other personally identifiable information? Additionally, we note that, according to Perkins, there are a few certified programs that may be prohibited by state regulation from storing data out of state. We seek comment on whether these prohibitions would prevent the input of the types of data described above – or any other related types of data – into a centralized database, and whether there are any other reasons that any of the currently certified programs would not be able to comply with requirements for the submission of such data into a centralized system. What are the costs and benefits of gathering the categories of information listed above?

Although we are aware of concerns relating to the sharing of consumer data we believe that there are compelling reasons for this information to be stored with the national database. We see the following issues with excluding identification information from the national database:

- Data has previously been provided – We note that the state programs have been required to submit consumer identity information such as name, address, email, and phone number as part of the current reporting and reimbursement requirements of the NDBEDP program. This information has been transmitted to the FCC and RLSA via email. Communication with a database would be easier to secure than via email attachment.

- Waste and abuse – The FCC is required to guard against waste and abuse. One form of abuse would be a consumer registering to receive services in multiple states. How can this be guarded against if there is no way to even perform a simple check whether a consumer has previously been registered to receive services? Without identification information in the database, it will be impossible to check for existing consumer records when inputting new applications. This will introduce a near certainty of inputting duplicate consumer records within the database.

- Transfers of consumers between states – With a national database that contains all the necessary data to track consumers, it would be extremely simple to manage when a consumer moves from one state to another. Their history of assessment, equipment provided, and training would all be able to follow them to their new state program. However, if portions of the data are not stored within the national database, this transfer of information would be considerably more difficult and subject to state interpretation on what information they are willing to provide.

34. We propose to permit the NDBEDP Administrator and other appropriate FCC staff to search this database and generate reports to analyze nationwide data on the NDBEDP, and seek comment on this proposal. To what extent should a certified program also be permitted access to the database to execute searches of data that it did not input into the database? For example, if we permit entry of data on deaf-blind individuals receiving equipment, should a certified program be permitted to conduct a search to determine whether the applicant is receiving equipment and services from another state? Similarly, should a certified program be permitted to access the database to determine the types of equipment being distributed by other states or the length of time typically used for assessments and training by other certified programs? We note that in the TRS context, access to a soon-to-be-formed user registration database will be restricted to TRS providers only for the purposes set forth in the VRS Reform Order, such as determining whether information in the database on registered users is correct. Similarly, we propose that access to the NDBEDP centralized database be limited to authorized entities, and be permitted only under tightly controlled conditions. We seek comment on who such entities should be and under what conditions they should be permitted such access, to ensure the privacy and confidentiality of financial and other sensitive information about consumers that may be entered into the database. We propose that the database administrator be tasked with establishing procedures, protocols, and other safeguards, such as password protection and encryption, to ensure database access is in fact restricted according to the Commission's guidelines. We seek comment on this approach, and the extent to which the NDBEDP Administrator should be given some discretion to determine when entities other than the Administrator or FCC staff can access the database.

User access to parts of a database should be limited to what a given user needs to meet the functional requirements for that user. A clear understanding of the goals of the database is essential to establishing those requirements for different classes of users. In particular, look at how far down the chain of user types needs to be supported for efficient data collection. In working with groups to collect and manage data for this program, we identify the following levels of access to the data within the national database.

- The NDBEDP Administrator and FCC staff will need to have access to see all consumers, and run reports of that analyze the data to properly monitor and manage the NDBEDP program.

- Administrative users of certified entities will need to have access for all consumers and Trainers / Assessors within their state

- Administrative users of certified entities and other staff entering new consumers (but not necessarily trainers/assessors) need to have access to a function to perform a simple and limited nationwide search to identify whether a consumer already exists. The data provided by this function would need to be limited to only the minimum that would be required to identify whether a prospective consumer has been entered into the database by another state program.

- Trainers / Assessors should be limited to see only the consumers that are on their case load. There are situations where a trainer / assessor works across state lines – this has been the case in both temporary situations (a consumer visiting relatives needed help with troubleshooting a repair) and long term situations (a trainer who makes regular trips to another state to work with consumers to fill gaps in coverage).

- The provider of the database will also need to have full access to the database in order to properly manage the system, and respond to helpdesk tickets for issues that are reported by the users from the state programs.

All access to the national database should be restricted to secure means of communication, and should require proper ID/password authentication. We would also recommend an adequate password policy be enforced to help protect the security of the database.

Regarding financial information used for consumer income verification – to date we store in the database, the type of documentation that was used to verify income status, the person who reviewed the documentation, and the physical location of the document. This seems to have been a workable compromise to needing to store actual financial information or identifiers such as SSN. If the determination is that a consumer's income eligibility needs to be re-evaluated upon request of additional equipment (¶51) , this approach would fit with transfers between states, the original program holds the physical documentation and any subsequent requests for the new state requires a re-verification of income.

Regarding data entry by trainers versus state administrators – our experience is that data captured by trainers/assessors as they provide the services is richer. For example in states where one person does data entry, it has proven more difficult to capture wait time/# days to service since all of the requests get entered in bunches instead of as they are made/scheduled.

35. Decisions regarding information to be included in a centralized database used for administration of the program and the individuals who may be granted access to the database can raise questions regarding compliance with Government-wide statutory and regulatory guidance with respect to privacy issues and the use of information technology, e.g., the Privacy Act of 1974107 and Federal Information Security Management Act of 2002.108 Parties commenting on the centralized database should ensure that their recommendations are consistent with Government-wide privacy and information technology statutory and regulatory guidance.

36. Based on its experience providing database services for 32 certified programs, Perkins estimates that the cost of establishing and maintaining an NDBEDP centralized database will be between 3-4% of the $9.5 million annual allocation available to certified programs under the pilot program, or between $285,000 and $380,000 annually.109 We seek comment on whether this amount of funding will be sufficient to perform the proposed functions of the database, and whether there will be start-up costs that result in higher costs during the first year of the database's operations. Based on Perkins's estimate, we further propose, if necessary, to authorize the Bureau to set aside funding for the NDBEDP database in an amount not exceed to $380,000 per year from the NDBEDP's annual allocation for the development of the database during the last year of the pilot program, to enable the implementation of the database functions for the permanent NDBEDP in a timely manner. If this approach is adopted, certified programs now paying to use an existing database, the costs of which are currently assessed against their 15% cap on administrative costs, would no longer need to do so.110 At the same time, we propose that certified programs continue to be permitted to seek reimbursement for the time spent entering data into and generating reports and reimbursement claims from the database as part of their administrative costs, up to the 15% cap. We seek comment on these various proposals.

We feel that the $285,000 - $380,000 range is reasonable to provide for the annual operation of the national database. We feel that the FCC needs to look for the following types of services when selecting a vendor to provide the national database.

- Application support / Helpdesk –When users of the database have questions in the use of the system, they will need to be able to contact the vendor to ask questions and get assistance. It is also worth noting that users of the database will use a wide variety of assistive technology themselves and that the vendor supporting them will need to keep this in mind for training, documentation and support.

- System Operations, Server, and Infrastructure management –The vendor will need to provide a secure, stable environment for the operation of the national database.

- Application Enhancement –As the needs of the NDBEDP grow, the national database will need to also be enhanced to keep pace. In addition, any issues in the application that are identified through the helpdesk will also need to be corrected and incorporated into new versions of the national database software.

- Data Management –Over the past 3 years of the pilot program, we have found that there was a significant amount of effort that was required to keep the database running smoothly. The tasks included things such as: Assistance with correcting data entry errors; Ensuring that standards were met when entering information about the available equipment models; and adjusting categories according to rulings by the NDBEDP administrator.

- Statistics / Trend analysis and Custom Reporting –While most database applications will typically have a number of standard reports that the state programs would be able to run themselves, there are often additional needs within a program such as the NDBEDP. A vendor of the national database should be prepared to provide

additional services to provide statistics and analysis to assist in the management and growth of the NDBEDP. For example, as the program looks to improve its outreach efforts, the national database can provide insights into what areas outreach has been more productive, and where further work may be required.

There would certainly be startup costs for any provider to make a system available for the national database. These "Startup Tasks" would include:

- Software Development costs – We are aware of no system that is already 100% ready to be adopted as the national database for the NDBEDP. Even with our system being used in 34 states of the NDBEDP, there are improvements that we feel would be necessary to make adoption smooth for all users. We would recommend a database system allow for:
    - Accessible design. Throughout the NDBEDP, there are users of the system that themselves are deaf, blind, or deafblind. The national database needs to perform well in meeting their needs to utilize the system.
    - Tracking of all information necessary to compile complete reports to submit to the FCC and RLSA. This would include image capture of supporting documentation, so that a complete report can be electronically generated. This would be an enormous time savings for the process of compiling reports.
- Data Conversion –As the NDBEDP has several years of history of consumers served and the equipment provided, we would recommend that all the existing data be migrated into the selected national database system. Once the data is loaded, additional quality control checks would need to be performed to identify potential duplicate consumer records, and verify that the data is complete.
- Training –A training program would need to be provided to get all staff members as well as assessors / trainers familiar and comfortable with using the national database system. Those programs would need to be recorded and provided on-line for follow-up training and/or training of new users of the system.
- Documentation / How-to guides – As an additional training resource for users of the national database, there should be written guides for how to make use of the system.

37. As an alternative to undertaking the development and maintenance of an NDBEDP database using existing staff and resources, the Commission will also consider a variety of approaches to satisfy the program requirements. For example, the Commission could engage another agency with information technology experience to provide administrative support for the program including database development and maintenance through an Interagency agreement. The Commission could also procure the database through a competitive procurement, as we recently did in 2011 with the TRS Fund Administrator. In addition, the Commission may evaluate whether to modify a contract with an existing contractor to satisfy the program requirements – either through direct performance by the main contractor or a subcontractor. Or the Commission may wish to invite entities, via a public notice, to submit applications for the development and maintenance of a centralized database, from which the Commission would then select a database administrator. The Commission will consider using a combination of any of these in-house, regulatory, or procurement strategies where efficient and lawful to do so.

38. Regardless of the precise mechanism chosen for obtaining a centralized database for the program, we seek input on the performance goals along with performance measures that should be used for this project. Other issues on which we seek input include the implementation schedule for the work; budget for the first three years of work related to the development and maintenance of the database; and prerequisite experience needed for staff employed in creating and managing a complex database capable of receiving large amounts of data. We also seek input regarding database query and data mining capabilities; and database design best practices to ensure that certified programs can generate reimbursement claims and submit them electronically to the TRS Fund Administrator using the database. We also seek input on the report functionality required for the database; and best practices with respect to data management, security, privacy, confidentiality, backup, and accessibility, including compliance with section 508 of the Rehabilitation Act.114

We agree with the points raised. In particular, we'd offer advice on the following points:

- Implementation Schedule. In order to ensure a smooth transition to the national database, a schedule would need to be developed--- and time is of the essence. We recommend that the vendor be selected as quickly as possible, in order to allow enough time to perform the "Start-up Tasks" outlined in section 36.

- Prerequisite experience. We feel that prerequisite experience for a vendor of the national database should include development and management of an existing system of similar scope and complexity.

- Accessibility. The vendor should have proven experience in developing accessible solutions, and supporting users of assistive technology. With the user base that will be utilizing the national database, we fell that it is crucial that a selected system be not only accessible, but also be very usable by people with disabilities.