CG Docket No. 10-210
Comment Date: August 22, 2014
Reply Comment Date: September 5, 2014

Thank you for the opportunity to provide comments on the National Deaf-Blind Equipment Distribution Program.

II. Program Structure

3. Currently, there are 53 entities – one entity per state, plus the District of Columbia, Puerto Rico, and the U.S. Virgin Islands – certified by the Consumer and Governmental Affairs Bureau (CGB or Bureau) to receive support for the distribution of equipment to low-income individuals who are deaf-blind. Each certified program has primary oversight and responsibility for compliance with program requirements, but may fulfill its responsibilities directly or through collaboration, partnership, or contract with other individuals or entities within or outside of their states or territories. We seek comment on whether this program structure should be retained for the permanent NDBEDP. Specifically, what are the advantages or disadvantages of having separately certified programs across the United States and its territories? Would it be more efficient or effective to have a single entity operate the NDBEDP nationwide, or fewer entities operate multistate regional programs across the country? Which would be preferable for consumers who are deaf-blind: localizing oversight of individual NDBEDP programs or centralizing the responsibilities currently handled by these programs?

COMMENTS: *Access Technologies, Inc. strongly believes the current Program structure should be retained for the permanent NDBEDP. In the current model, the certification of quality entities, such as the State AT Programs ensures services are being provided by professionals who not only have a deep understanding of AT devices, proven ability to provide AT solutions to individuals with multiple disabilities including the deaf-blind population, but also understand the culture of their state, and are therefore able to more appropriately address the needs of their consumers.*

The AT Programs have been operating for almost 25 years, and have developed strong coordination efforts among agencies and service groups statewide to identify barriers for accessing telecommunication equipment and services for low-income individuals, of all ages, who experience deaf-blindness. The success of the NDBED pilot is directly related to the skills, knowledge and abilities of the current qualified entities which have been certified to fulfill the obligations of the grant.

Consumers have expressed their appreciation for the services being provided locally, and are excited to know their assessors and trainers are professionals from their communities, rather than someone who has to fly in to see them. Establishing a single entity to operate the NDBEDP will turn consumers away, as they will view the Program as a non-personable government entity, rather than an exciting service that is being provided in their homes state. The same would be true if the Program was operated by multistate regional programs.

4. At present, each certified program is responsible for both the distribution of equipment and various administrative functions associated with the NDBEDP. Tasks associated with the distribution of equipment include outreach, assessment, installation of devices, and training. Administrative functions include the submission of reimbursement claims, the fulfillment of reporting obligations, and conducting annual audits. What would be the advantages or disadvantages of transferring some of the responsibilities in either or both of these categories (distribution of equipment and/or administrative functions) to a single administrator? Which tasks would be appropriate for assignment to a central administrator? Would it be

preferable to maintain individual certified programs for certain tasks – for example, those related to the distribution of equipment – while centralizing some or all of the administrative functions in a single entity? To what extent would there be advantages to adopting centralized web-based systems for processing reimbursement claims or reporting? We note that during the NDBEDP pilot program, some state programs relinquished their certification, requiring the Commission to seek replacements in those states. We ask interested stakeholders to comment on whether centralizing certain distribution and/or administrative functions would increase the likelihood that programs will fulfill the terms of their certification by creating greater efficiencies. What other measures can the Commission take to improve the structure of the NDBEDP and support certified programs in their efforts to distribute equipment to people who are deaf-blind?

COMMENTS: *Agreeably, some certified entities were not prepared for the financial burden they experienced during the initial startup of the Program, and may not have had experience operating a grant Program from "birth". Entities with strong working relationships, such as the Statewide AT Programs who have over the past 25 years, developed a strong networking system, have been able to discuss both Program and Administrative issues among themselves.*

Having operated the NDBEDP for the past two years in Oregon, I believe it would be a disservice to the consumers if any of the Program or Administrative tasks are assigned to a central administrator as it will disrupt the flow of services; causing a delay in Program services. In Oregon, consumers experience a seamless process from the time they submit their application to the time they are independently telecommunicating with family and friends, and ATI has developed a smooth process for ensuring all Administrative tasks are managed in a timely and professional manner as well. Furthermore, having Program and Administrative tasks completed by the same certified entity ensures a quick and successful audit.

Ensuring certified entities are skilled in providing direct services to individuals with multiple disabilities, a range of AT services including guided device demonstrations, and individualized AT training will assure ongoing success of the Program, and minimize the support necessary from the Commission.

5. The *NDBEDP Report and Order* set forth a series of criteria that has been used by the Bureau to evaluate an entity's qualifications to obtain certification, including expertise and experience in the field of deaf-blindness and communications services, sufficient staffing and facilities, and the ability to communicate effectively with and provide equipment training for people who are deaf-blind. Should the Commission change any of these criteria and, if so, how? If the Commission chooses to centralize some of the functions associated with the distribution or administrative functions of the NDBEDP, what qualifications should the entity chosen to manage these functions have? How should such entity be selected? For example, should the Bureau invite entities to apply and then make a selection from among qualified applicants?

COMMENTS: *The criteria that has been used by the Bureau to evaluate an entity's qualifications to obtain certification, including expertise and experience in the field of deaf-blindness and communications services, sufficient staffing and facilities, and the ability to communicate effectively with and provide equipment training for people who are deaf-blind is appropriate and should not be changed.*

If the Commission chooses to centralize some of the functions associated with the distribution or administrative functions of the NDBEDP, the chosen entity to manage these functions should have similar qualifications as successful certified entities currently have.

Although we believe centralizing ANY of the functions associated with the distribution or administrative functions of the NDBEDP will be a disservice to the consumers, should the Commission choose to centralize some of the functions, the chosen entity to manage these functions should have similar qualifications as successful certified entities currently have, and the Bureau should invite entities to apply, based on a published set of criteria and then make a selection from among qualified applicants.

6. At present, all NDBEDP programs are certified for the duration of the pilot program. Should the Commission's rules for a permanent NDBEDP limit the duration of each program's certification? We note that under the Commission's telecommunications relay service (TRS) rules, states are certified by the Commission to operate their own TRS programs for a period of five years, after which they must seek renewal of their certification. Is this certification period similarly appropriate for NDBEDP certified programs? If not, what would be an appropriate period, and why? Should entities that currently have certification to distribute equipment be permitted to carry over their certification into the permanent program, or should they be required to reapply for certification?

COMMENTS: *Modeling the certification renewal for the NDBEDP after the Commission's telecommunications relay service is good idea. Entities that currently have certification to distribute equipment should be permitted to carry over their certification into the permanent program.*

7. During the NDBEDP pilot program, the Bureau designated an NDBEDP Administrator who has been responsible for, among other things, reviewing applications from entities for certification to receive NDBEDP funding, allocating NDBEDP funding, reviewing reimbursement claims, maintaining the NDBEDP website, resolving stakeholder issues, and serving as the Commission point of contact for the NDBEDP. The NDBEDP Administrator has worked in collaboration with the current TRS Fund Administrator, Rolka Loube Saltzer Associates, LLC, which is responsible for, among other things, reviewing cost submissions and releasing funds under the NDBEDP for distributed equipment and related services, including outreach efforts. We seek comment on the extent to which any of these administrative responsibilities should be modified, and if so, how and for what purposes.

COMMENTS: *Access Technologies, Inc. believes this process is working.*

III. Funding

8. In the *NDBEDP Report and Order*, the Commission set aside $500,000 of the $10 million available annually for the NDBEDP for national outreach efforts during each year of the pilot program. The remaining $9.5 million of the $10 million is allocated to each of the NDBEDP certified programs, to be distributed as reimbursement for the reasonable costs of operating these programs in compliance with the Commission's rules. Funding allocations for each of the 53 programs that are currently certified has been calculated by allocating a minimum base amount of $50,000 for each jurisdiction plus an amount in proportion to each jurisdiction's population. If the Commission continues to operate the NDBEDP through certified programs, is this current funding allocation system reasonable and fair? We ask that commenters who believe that this approach to funding allocations should be changed be specific in describing what changes should be made and what purpose these changes will serve.

COMMENTS: *Access Technologies, Inc. believes the manner in which funding allocations for Program and Administrative expenses are calculated is reasonable and fair. However, we believe certified entities ought to receive additional funds to conduct more appropriate "localized" outreach. Please see additional comments under VIII. Outreach and Education*

9. During the first year of the pilot program, NDBEDP certified programs submitted reimbursement claims to the TRS Fund Administrator for approximately 70 percent of the $10 million available to support the NDBEDP. Although data for the second year of the pilot program, which ends June 30, 2015, are not yet fully available, requests for reimbursement to date suggest that these claims are likely to reach 100 percent of the $10 million annual allocation. During each of the pilot program years, the NDBEDP Administrator has reviewed funding data as it has become available and has worked with certified programs and the Bureau to have funding reallocated between state programs when necessary to maximize the use of available funding. To what extent have these reallocations helped to meet the needs of certified programs in receipt of such funds? Have they in any way hindered the distribution of equipment by programs that have not fully utilized their allocations? Should the permanent NDBEDP rules continue to authorize the reallocation of funds from one program to another, as deemed necessary and appropriate?

COMMENTS: *Since the funds cannot be carried over into the next year, and entities will not be reimbursed for expenses that exceed their allocated funds, there will be unique situations when a certified entity will not be able spend all of their funds, and rather than return the funds, it's better to reallocate these funds to an entity that has a waiting list.*

10. Under the NDBEDP pilot program, the Commission has reimbursed certified programs for the authorized costs of equipment and related services after these costs have been incurred, up to each program's initial or adjusted allocation. The Commission adopted this approach to provide incentives to actively locate eligible participants and to provide greater accountability and protection against fraud, waste, and abuse. Certified programs may elect to seek such reimbursement monthly, quarterly, or semi-annually. We seek comment on how this reimbursement mechanism has worked in practice and whether the Commission should retain this reimbursement mechanism or adopt another mechanism to support certified programs. If the Commission should consider changes to the reimbursement mechanism, what alternative mechanism could be adopted that would provide incentives to locate eligible participants, achieve accountability, and protect against fraud, waste, and abuse and how would it function? As noted above, over the past two years, on occasion, the NDBEDP Administrator has adjusted allocations among the NDBEDP certified programs. If funds were advanced to certified programs, but then not fully used during the Fund year, how would the program return those funds to the Commission's TRS Fund Administrator for reallocation to other certified programs? Would reallocation during each Fund year be possible with a funding mechanism other than the reimbursement mechanism now used? For example, would it be feasible to reallocate funds if each certified program receives its allotted portion of the funding prior to these funds being spent for covered equipment and services? If the present reimbursement mechanism is retained, how can the Commission make it more efficient? For example, would programs benefit from using a centralized web-based system to input cost-related information and documentation, from which standardized reimbursement claims and reports could be generated to expedite processing, payment, and reporting? Would such a centralized web-based system facilitate more rapid payment of claims? Should the Commission require that such claims be paid within a certain time frame and, if so, what time frame would be appropriate?

COMMENTS: *Access Technologies, Inc. appreciates the flexibility the Commission has provided in allowing certified programs to select their reimbursement timeframe and would like this reimbursement mechanism to remain. We believe advancing funds would endanger accountability of the Program, and provide greater opportunity for risk of fraud. Additionally, it would be extremely difficult to reallocate funds if certified program received their allotted portion of the funding prior to these funds being spent for covered equipment and services.*

Changes that were implemented during the two years of the pilot have allowed entities to better understand supporting documentation that is required for timely reimbursement. Therefore, we do not

believe it is necessary to develop a centralized web-based system to input cost-related information and documentation, from which standardized reimbursement claims and reports could be generated.

We believe entities should expect to receive their reimbursements 30 days following submission of "accurate and appropriate" reimbursement documentation.

11. NDBEDP certified programs may be reimbursed for administrative costs up to 15 percent of their total reimbursable costs for equipment and related services, but have no caps on costs associated with outreach, assessments, equipment, installation, or training. We seek comment on whether this 15 percent cap on administrative costs should be retained. Is 15 percent sufficient to cover administrative costs typically incurred through participation in the NDBEDP, such as reporting requirements, accounting, regular audits, oversight, and general administration? Are there other types of administrative costs typically incurred by NDBEDP certified programs that are not listed here? Should the cap on administrative costs be based on the program's annual funding allocation rather than reimbursable costs for equipment and related services? Would a cap on administrative costs based on the program's annual funding allocation act as a disincentive to locate or provide equipment and related services to eligible participants, since a certified entity would be entitled to such reimbursement without having delivered any equipment or related services?

COMMENTS: *Access Technologies, Inc. does not believe a cap on administrative costs based on the program's annual funding allocation will act as a disincentive to locate or provide equipment and related services to eligible participants. Instead, we believe it will allow certified entities to more easily estimate their reimbursement, rather than incur admin costs that will not be covered.*

12. If the Commission decides to adopt a centralized web-based system for accounting and reporting, what amount of the annual $10 million allocation should be set aside for these purposes? Similarly, what annual costs would individual programs have to incur to participate in such a centralized system? Should a certified program's costs to participate in a centralized web-based accounting and reporting system be considered program costs, rather than administrative costs? If so, should the 15 percent cap on administrative costs be retained or changed? If they are considered administrative costs, should they be subject to the 15 percent cap?

COMMENTS: *If the Commission adopts a centralized web-based system for accounting and reporting costs to individual programs to enter data into this system should be considered program costs, rather than administrative costs. Access Technologies, Inc. currently purchases access to the KLAS database, which is expensed as administrative costs, and then when data is entered for reporting and reimbursement these hours are also charged as administrative time. It seems like while a flat rate use the database, or a centralized web-based accounting and reporting system could be expensed as administrative costs, information being entered is directly related to program activities and should be expensed as program time. However, if these costs continue to be considered as administrative costs, they should be outside of the 15 percent cap.*

IV. Consumer Eligibility

13. *Individuals who are Deaf-Blind*. To participate in the NDBEDP, the CVAA requires that individuals must be "deaf-blind," as that term is defined in the Helen Keller National Center Act (HKNC Act). The Commission's NDBEDP pilot program rules also direct NDBEDP certified programs to consider an individual's functional abilities with respect to using telecommunications, advanced communications, and Internet access services in various environments when determining whether an individual is "deaf-blind." The NDBEDP pilot program rules further require that individuals seeking

equipment under the NDBEDP must provide disability verification from a professional (*e.g.*, community-based service provider, vision or hearing related professional, vocational rehabilitation counselor, educator, and medical or health professional) who has direct knowledge of and can attest to the individual's disability. Under the permanent rules, should the NDBEDP continue to accept as disability verification documentation already in the applicant's possession, such as individualized education programs and Social Security determination letters? We seek comment on the extent to which these rules have provided certified programs with the flexibility they need to identify the full range of individuals who are deaf-blind for whom the NDBEDP was intended to serve. To the extent that commenters request modifications to these rules, we seek input on the Commission's authority to adopt those modifications, given the CVAA's definition of individuals who are "deaf-blind" who are eligible under the NDBEDP.

COMMENTS: *The ability to accept as disability verification documentation already in the applicant's possession, such as individualized education programs and Social Security determination letters, has provided current certified programs with the flexibility necessary to identify the full range of individuals who are deaf-blind for whom the NDBEDP was intended to serve.*

14. *Low Income Limitation*. To participate in the NDBEDP, individuals must be low-income. The NDBEDP pilot program rules define low-income as 400% of the Federal Poverty Guidelines (FPG) and allow automatic income eligibility for individuals enrolled in federal subsidy programs with income thresholds lower than 400% of the FPG. Should the NDBEDP continue to use the 400% of FPG rule for income eligibility? If not, what measure of income would be appropriate for the permanent program? How should "income" be calculated (*e.g.*, salary before any deductions, plus any public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, lottery winnings, or other forms of income)? Should income be determined only with respect to the individual (regardless of his or her status as a child, adult, student, dependent, or financially independent person) or with respect to the household (*e.g.*, an individual or group of individuals who are living together at the same address as one economic unit)? We ask that commenters explain how their proposals would be consistent with the "low-income" eligibility criteria mandated for this program, as well as other federal programs.

COMMENTS: *Access Technologies, Inc. has found the threshold of 400% of FPG for the majority of the deaf-blind consumers we have been working with is sufficient, and while our office has not deemed any of the consumer "unqualified" because they exceed the threshold by a few dollars, some consumers have not applied for the program. We understand deaf-blind consumers have considerably higher medical and disability-related expenses, and therefore, perhaps a formula could be developed to allow consumers who are outside of this threshold to pay a percentage of the cost of the equipment and services they receive based on a sliding fee..*

15. *Other Eligibility Criteria*. During the NDBEDP pilot program, the Commission's rules have permitted certified programs to require that NDBEDP equipment recipients demonstrate that they have access to the telecommunications, advanced communications, or Internet access services that the equipment is designed to use and make accessible. In contrast, certified programs may not impose employment-related eligibility requirements for individuals to participate in the program. We seek comment on whether these eligibility criteria should be maintained for the permanent NDBEDP and whether there are other eligibility requirements that should be considered. Should certified programs be permitted to consider the demographics of their jurisdictions, the amount of NDBEDP funds allocated for their jurisdiction, the availability of equipment and services through other programs, or other factors to prioritize the distribution of equipment or provision of related services to qualified applicants?

COMMENTS: Access Technologies, Inc. believes that since this program is designed to provide access to and acquiring of telecommunication technologies, the technology would not be able to be used properly if the individual does not already have access to internet or telephone service. Additional funding options are already considered when an assessment is taking place however since the use of the technology is not school or employment orientated other funding options would not pick up the cost of the equipment.

V. Equipment

16. The NDBEDP provides support for the distribution of specialized customer premises equipment needed to make telecommunications services, Internet access service, and advanced communications, including interexchange services and advanced telecommunications and information services accessible to people who are deaf-blind. Under the NDBEDP pilot program, the Commission reimburses certified programs for the reasonable cost of equipment, which may be hardware, software, or applications, separate or in combination, mainstream or specialized, as long as it meets the needs of the deaf-blind individual to achieve access to NDBEDP covered services. Certified programs are permitted to distribute multiple pieces of equipment to eligible consumers, as needed. Equipment-related expenses, including maintenance, repairs, warranties, returns, maintaining an inventory of loaner equipment, as well as refurbishing, upgrading, and replacing equipment distributed to consumers are also reimbursable. Under the NDBEDP pilot program, certified programs may lend or transfer ownership of the distributed equipment to qualified recipients. When a recipient relocates to another state, certified programs must permit the transfer of the recipient's account and any control of the distributed equipment to the new state's certified program. We seek comment on these provisions of the NDBEDP pilot program, and whether the distribution of equipment under the permanent NDBEDP should be treated differently. If so, how and why would such changes be consistent with the CVAA, benefit eligible low-income individuals who are deaf-blind, and result in more efficient or effective use of NDBEDP funds? For example, now that most programs are using up their annual fund allotment, should programs be directed to limit the number of devices that each eligible individual may receive in a specified period of time, such as one or two Fund years? Would this practice further or impede the goals of the NDBEDP?

COMMENTS: *While Access Technologies, Inc. does not wish to impede access to telecommunication needs, in order to prevent individuals from abusing this program's generosity, it would make sense to limit a consumers equipment to one device for mobile usage, and one device for home telecommunication, as well as any alerts or accessories which the consumer may need. Additionally since the individuals are low-income it only makes sense to obtain an extended warranty and software updates in order to make sure the equipment stays current.*

VI. Individualized Assessment of Communications Needs

17. Under the NDBEDP pilot program, the Commission's rules permit reimbursement for the reasonable costs of making individualized assessments of a deaf-blind individual's communications needs by qualified assistive technology specialists. The Commission also permits reimbursement for reasonable travel costs of assessors and for support services, such as qualified interpreters, to conduct individualized assessments, but does not permit reimbursement of travel costs for consumers to travel to receive assessments. We seek comment on the appropriateness of the Commission's rules governing reimbursement for individualized assessments, and whether reimbursement of the reasonable costs of the consumer's travel for such assessments would make the NDBEDP more efficient and effective, as well as the extent to which such travel would benefit consumers. For example, would it benefit potential

equipment recipients to be able to try out various types of communication devices that are located on the premises of the certified programs?

COMMENTS: *Access Technologies Inc. believes the efficient and effective assessments occurs when the assessor takes various types of communication devices to the consumer's location for the assessment; allowing the consumer to explore the technology in the environment where it will be used. This reduces the likelihood of poor decision making.*

Additionally having the assessment conducted at the consumer's location allows the trainer to see what telecommunication technologies the consumer is already using and how the soon to be recommended technologies will work with their current equipment.

VII. Installation and Training

18. The NDBEDP pilot program permits reimbursement for the reasonable costs of installing NDBEDP distributed equipment and individualized consumer training on how to use the distributed equipment. The Commission also permits reimbursement for reasonable travel costs of trainers and for support services, such as qualified interpreters, to conduct individualized training, but does not permit reimbursement of travel costs for consumers to travel to receive individualized training. We seek comment on whether reimbursement of these costs should continue to be permitted, and whether permitting reimbursement for the reasonable costs of the consumer's travel for installation and training would make the NDBEDP more efficient and effective. Are there circumstances in which consumers would benefit if they are reimbursed for travel to distribution centers to obtain training?

COMMENTS: *Access Technologies, Inc. believes it is vital for the Program to continue to install the new technologies, and ensure the consumers receive adequate training in order to successfully use their new technologies. Too many times, State AT Programs meet individuals who have "the perfect accommodation" but they don't know how to use it, so it simply collects dust.*

We believe it is important to conduct the assessments in the location where the technology is going to be used. This allows the assessor to determine if the individual has other technology that will be used in conjunction with the new equipment, or when the consumer will be receiving a computer, if the assessment is conducted in their home, then the assessor will be able to talk about the size of the computer/monitor and ensure the consumer has the appropriate workstation to accommodate the technology.

Additionally, the consumer must receive training on their new technology. Therefore, if they travel to the trainer, many times they will not be able to transport the equipment, and therefore the training will not be as successful; especially if the consumer is traveling to another state.

19. In the *NDBEDP Report and Order*, the Commission declined to set aside NDBEDP funds in the pilot program to cover the cost of training for qualified individuals who can train NDBEDP equipment recipients – *i.e.*, a "train the trainer" service. At that time, it understood that there was a shortage of qualified personnel, particularly with respect to training consumers who communicate receptively and/or expressively in Braille or American Sign Language. As a result, the Commission encouraged certified programs to maximize the use of limited resources through collaboration, partnerships, or contracts between and among certified programs and other individuals and entities. We seek comment on the extent to which there remains a shortage of qualified personnel to provide training to NDBEDP equipment recipients. Are certified programs already using train-the-trainer programs? What resources currently exist for trainers to learn about new technology or consult with subject matter

experts on an ongoing basis? Should a national entity coordinate such training? Would online training modules by skilled specialists be effective to provide training remotely? We seek comment on whether NDBEDP funds should be allocated for train-the-trainer programs, the Commission's authority to allocate such funds, the amount of funding that should be set aside for such training, and for what period of time such funding should be permitted.

COMMENTS: *Our Specialists participate in annual professional development courses, both online and through conferences. This type of experience takes several years to develop. The trainers must be able to identify and match a consumer's skill level to the appropriate technology, which requires trainers to be able to provide assessments and trainings on a wide range of technology. Additionally trainers need to demonstrate experience working with individuals with multiple disabilities; which is developed over a few years, and isn't necessarily gained by online training or taught in a classroom setting.*

VIII. Outreach and Education

20. The Commission has set aside $500,000 of the $10 million available annually for national outreach efforts to promote the NDBEDP during each year of the pilot program. For this effort, the Perkins School for the Blind partnered with the Helen Keller National Center for Deaf-Blind Youths and Adults, FableVision, Inc., and worked with other national and local consumer groups, parent groups, agencies, and associations. Among other things, this outreach effort has resulted in an NDBEDP website, social media presence, and public service announcements (PSAs), as well as advertisements on billboards and in magazines. We seek comment on the efforts undertaken by the national outreach program, and whether the Commission should continue to fund national outreach efforts to promote the NDBEDP. If so, is $500,000 or a different amount appropriate for such outreach, and for how long should funding be continued?

COMMENTS: *Access Technologies, Inc. wonders why, if Perkins School for the Blind receives part of the $500,000 marketing funds, they wish to charge states additional monies to provide marketing for that state. Furthermore, we believe the national outreach effort has not been successful in marketing the NDBEDP. The wording "iCanConnect" on a billboard does not explain or grab the interest of the individual passing by. Additionally it's difficult for a national outreach campaign to appeal to the unique culture of each state and territory. For example, it is the experience of Access Technologies, Inc. that the majority of Oregonians who qualify for services through the NDBEDP do not consider themselves deaf-blind, rather they think more in terms as having a combined hearing and vision loss. Once Access Technologies, Inc. begin working with local advertisement professionals and developed ads associating our logo and services with "iCanConnect" interest in the Program increased. Access Technologies, Inc. believes additional monies should be provided annually to the certified entities for local marketing.*

21. In addition to the set aside of $500,000 per year for national outreach during the pilot program, certified programs have been reimbursed for the reasonable costs of outreach conducted within their own jurisdictions. We seek comment on such state and local outreach efforts, their success, and whether such efforts should continue to be reimbursable under the permanent NDBEDP.

COMMENTS: *The success of the Program is due in part by outreach efforts conducted by the certified entities. Funds for these efforts should continue to be reimbursable under the permanent NDBEDP. Should there be a cap on the amount of Program dollars that can be used for these efforts.*

IX. Oversight and Reporting

22. Commission rules require all certified programs to report certain information to the Commission in an electronic format every six months. The report must include, among other things, information about NDBEDP equipment recipients; distributed equipment; the cost, time and other resources allocated to outreach activities, assessment, equipment installation and training, and for equipment maintenance, repair, refurbishment, and upgrades; equipment requests that have been rejected; complaints; and waiting lists. In the *NDBEDP Report and Order*, the Commission concluded that such reporting is necessary for the effective administration of the NDBEDP pilot program, to assess the effectiveness of the program, to ensure the integrity of the TRS Fund, to ensure compliance with the NDBEDP pilot program rules, and to inform the Commission's rulemaking for the permanent NDBEDP. We seek comment on the extent to which such reporting obligations remain necessary, as well as ways to simplify this reporting requirement for the permanent NDBEDP. Commenters suggesting that these obligations be modified should offer specific changes, and explain what, if any, the impact of modifying these obligations would be on certified programs, consumers, and the Commission's ability to oversee the NDBEDP. For example, would submission of the required information through a centralized web-based system be more efficient? Would such a system enable more standardized reporting and more effective data analysis? Should the reporting requirements be streamlined so they can be used to satisfy the information and documentation that certified programs must submit to support claims for reimbursement to facilitate the submission of both reports and claims? What kinds of qualitative information do NDBEDP certified programs and equipment recipients have that would benefit the Commission's oversight of the permanent NDBEDP? What other changes should be made to the reporting requirements that would help inform the Commission about the program's efficacy, yet minimize burdens on certified programs?

COMMENTS: *Access Technologies, Inc. uses the KLAS database for reimbursement and reporting purposes and finds these reporting obligations are easy to satisfy. Should a centralized web-based system be developed for reporting purposes, to minimize burdens on certified programs, it would be beneficial to ensure the reporting and reimbursement systems are linked together.*

23. In addition to reporting requirements, certified programs must engage an independent auditor to perform annual audits designed to detect and prevent fraud, waste, and abuse. We seek comment on whether this audit requirement has been effective and whether the Commission should impose additional safeguards to protect the integrity of the TRS Fund and the NDBEDP.

COMMENTS: *Access Technologies, Inc. found the requirements of the audit appropriate to safeguard and protect the integrity of the TRS Fund and the NDBEDP.*