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NDBEDP PN Comments

To: Federal Communications Commission

Date: September 5, 2014

From: Joan M. Schneider

RE: CG Docket No. 10-210

The following comments are respectfully submitted in response to the Public Notice dated August 1, 2014.

II. Program Structure

3. Please maintain local certified programs versus a centralized program. Local programs are better able to reach and meet the needs of the constituents. It also makes the local programs accountable for the outcomes. In Wisconsin we believe we have been able to reach a larger number of eligible individuals due to the close contact, networking and collaboration with local organizations and service providers that is supported by the local approach.

4. Uniform web-based systems for states to use in processing applications, services, reimbursement requests, and reporting would be a productive improvement to the NDBEDP. In addition to the benefits noted below, should a consumer relocate to another state, all documents can be made readily available to the certified program within that state. In addition, the process of auditing and reimbursement should work based on reports generated by the system and allow auditors access to view the documentation.

- The application system should contain the application template and allow for confidential and secure storage of the original application, medical documents, financial information, and any other pertinent information documenting a participant's eligibility for the program.
- The service system should contain templates for various service reports required, ie: assessment data, training data, repair data, troubleshooting items, etc. Upon completion of each report, billing information such as date, time, travel time, mileage, et cetera should be captured and the pertinent documentation stored in the system. (Assessor/trainer input)
- Reimbursement system should contain billing templates for the various services, including equipment purchases, and allow for storage of invoices being submitted and any other documentation of expenses. (Billing dept. input)
- All templates in the system should contain various fields required for reporting.

Note: Any discrepancies between the service system and reimbursement system will need to be reconciled prior to payment of invoices submitted.

A centralized purchasing system is unnecessary and less desirable due to:

- Time delays in the ordering, receipt, and delivery of equipment to the **end user**. This delay impacts warranties and ability to return defective items.
- Being restricted to certain products and having to deal with a “process” for exceptions or additions/updates to the list of options.
- Any “customization” of products such as additional RAM in a CPU delays would introduce delays and complications to equipment orders.
- Places strains on working relationships with local vendors when soliciting information on their products and then having the order be placed through their corporate office.

5. The current criteria set forth in the PN are appropriate.

6. Recertification every five years reinforces accountability for existing programs and could allow for a process whereby states can reassess their desire and ability to run the program in their own states.

7. No opinion.

III. Funding

8. The current strategy of funding allocations based on the distribution of the eligible population appears to be fair. As each local certified program becomes aware of the volume and needs, consideration of how best to meet these demands will need to be addressed. Adjustment of state allocations based on past performance and effectiveness should be considered.

9. It is appropriate to continue authorizing reallocation of funds from one NDBEDP certified program to another as long as it appears that some certified programs, despite their good faith efforts, will not be utilizing all of their funds for that one year.

10. I do support the reimbursement mechanism. To make this system more efficient, I do support a centralized web-based reimbursement system containing billing templates for the various services, including equipment purchases, and allow for storage of invoices being submitted. (Billing dept. input)

11. There are other administrative costs affiliated with this program that states are covering but 15% of total reimbursable costs for equipment and related services with no caps on costs associated with outreach, assessments, equipment, installations, or training is a reasonable limit. Consideration should be given to allowing a higher percentage where outreach and possibly other allowable costs are not being accessed or are used sparingly.

12. A uniform web-based accounting and reporting system should be considered an administrative cost and could be expensed against the 15% of the total reimbursable costs for equipment and related services. These expenses should be assigned based on the size of the state’s program allocation rather than a uniform per-state fee.

IV. Consumer Eligibility

13. The current definition and disability verification process is fine. No changes are needed.

14. The current low income limitation of 400% of the Federal Poverty Guidelines has restricted some adults, young adults, youths, and children from participating in this program. To simplify financial eligibility criterion, the NDBEDP should allow states to automatically approve income eligibility for individuals enrolled in any state or federal subsidy program with income thresholds lower than 400% of the Federal Poverty Guidelines. **Removal of the financial eligibility criterion would be ideal.**

15. Other eligibility criteria to consider are the applicants' current level of functioning. "Assessing" whether the applicant is ready, willing, and able to access distance telecommunications has been helpful for screening purposes.

V. Equipment

16. The current equipment distribution practices implemented during the pilot program have shown to be useful and appropriate and should be continued. An additional factor to consider is that this program should be a "needs based" program and not a "want based" program. With that criterion there is no need to establish a specific period of time between funding. In support of the "needs based" criterion, a consumer experiencing two of the three following issues warrants another assessment:

- developmental changes or
- medical condition changes, and
- current equipment no longer functions or otherwise no longer meets the individual's distance communication needs.

The outcome of the assessment should determine the equipment to be obtained.

VI. Individualized Assessment of Communication Needs

17. The current practice of the assessor traveling to meet the consumer in the home environment should be maintained. The benefit of this practice is seeing and assessing the consumer's **actual needs**, determining if any existing equipment is functional or requires upgrades or replacement, recommending equipment that is functional in their home environment, along with identifying and capitalizing on available supports. Only in rare circumstances should a consumer be allowed to travel for an assessment and be reimbursed for this cost. Rationale for this limitation is the unknown factor of the consumer's ability to travel safely. Even if accompany by another individual, the liability risk is too high and it does not allow for assessment of the practical environment for the equipment installation or use.

VII. Installation and Training

18. The current practices implemented in the pilot program should be maintained. Regarding effectiveness of consumers attending a training center for training, even if the consumers bring their own devices, it ignores the differences in internet connections and other limitations in the home environment. While some consumers are able to transfer most of what they learn at a training facility to their home environment, others cannot. Even with consumers who are successful with transferring the skills, home visits are often needed to assist with troubleshooting problems unique to the consumers' environments.

19. It is not the responsibility of the NDBEDP to provide "train the trainer" services and NDBEDP program funds should not be used for this purpose.

VIII. Outreach and Education

20. Maintenance of the iCC website is an important marketing tool; however, it is not clear why the maintenance of the iCC website warrants a \$500,000 budget. Nevertheless, an appropriate level of funding should continue to maintain the iCC website. I question the effectiveness of the other national marketing and outreach efforts. Monies for those efforts should be allocated back to the states.

21. The local certified programs should be able to allocate funds to launch their own outreach campaigns.

IX. Oversight and Reporting

22. These comments provide support a uniform web-based system to allow for more standardized reporting and effective data analysis. Reporting requirements should be streamlined to facilitate submission of both reports and reimbursement claims.

23. An independent audit is adequate.

X. Other Considerations

24. For many individuals transitioning from using remaining vision to touch/tactile form is very difficult. Please keep in mind that “low” tech magnifiers do indeed aid in distance telecommunications by aiding one in “seeing” the button to turn on the CPU, the button/dial to increase the volume on the phone, the buttons to dial the phone, et cetera.

XI. Procedural Matters

Thank you for this opportunity to comment on the future structure of the NDBEDP.

Respectfully,

A handwritten signature in blue ink, appearing to read "Jim H. Schneider". The signature is written in a cursive style with a long, sweeping underline.