

**National Deaf-Blind Equipment Distribution Program (NDBEDP)**  
**Program Staff Guidance & Frequently Asked Questions**  
<https://rolkaloube.com/programs/ndbedp/ndbedp-faqs/>

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## **I. Program Administration**

### **A. Certification Procedures**

#### **1. Can a certified program transfer its certification to another entity?**

No. Certification is granted to a single entity in each state or territory that is eligible for reimbursement. While certified programs may contract with other entities to perform NDBEDP-related tasks, ultimately the certified entity remains responsible for ensuring that all NDBEDP-related tasks are performed and is the only entity authorized to receive compensation from the Telecommunications Relay Services (TRS) Fund.

A program that wishes to relinquish its certification before the expiration of its certification shall electronically provide written notice of its intent to relinquish to the NDBEDP Administrator and the TRS Fund Administrator at least 90 days in advance, with an explanation of the reason for such relinquishment and its proposed departure date. After receiving such notice, the Federal Communications Commission (FCC or Commission) will take such steps as may be necessary, consistent with its rules, to ensure continuity and effective oversight of the NDBEDP for the affected state or territory.

#### **2. If a certified program wants to renew its certification, when should it file its application?**

Certified programs must renew their certifications every five years. Applications for certification renewal must be filed by the end of the fourth year of the term (see §64.6207(b)(2)).

#### **3. If a certified program elects not to renew its certification, what steps must it take to receive its final reimbursement?**

1. Submit final reimbursement claims and 6-month reports within 30 days of the effective date of its departure.
2. Transfer all consumer data, records and program operation information for the last five years to the new certified program.
3. Transfer all program purchased equipment and materials remaining in its inventory to the new certified program.
4. Provide notification of and contact information for the new certified program to current program consumers, consumers who have received equipment within the past three years, and consumers who are in the process of applying.
5. Once all departing obligations are completed, notify the NDBEDP Administrator so final payment may be approved.
6. The audit report for the exiting entity's final NDBEDP period should also be submitted once it is completed.

**4. If the certified program chooses to relinquish its certification, when must the program notify the FCC?**

Pursuant to 47 CFR § 64.6207(g) and (j), certified programs that choose to relinquish their certifications must:

1. Notify the NDBEDP Administrator in writing at least 90 days prior to their intended effective date of relinquishment. The notice must include:
  - a. the reason for departure, and
  - b. the proposed date of departure.
2. Submit final reimbursement claims and 6-month reports within 30 days of the effective date of departure.
3. Within 30 days after the new entity is certified, and as a condition precedent to receiving payment for any reimbursement claims pending as of or after the date of certification of the new entity, the outgoing entity must:
  - a. Transfer all consumer data, records and program operation information for the period served by the relinquishing program to the new certified program,
  - b. Transfer all program purchased equipment and materials remaining in its inventory to the new certified program,
  - c. Provide notification of and contact information for the new certified program to residents of that state or territory who are in the process of obtaining equipment or related services, or who received equipment during the previous three-year period, and
  - d. Once all departing obligations are completed, notify the NDBEDP Administrator in order to receive approval of final payment.

**5. What should the certified program do if it experiences a substantive change that affects its ability to meet its program obligations?**

The certified program must report to the FCC any substantive change in its program or operations within 60 days of when that change occurs. Substantive changes include those that might bear on the qualifications of the entity to meet the criteria for certification, such as changes in a program's ability to distribute equipment across its state or territory, or significant changes in its staff and facilities (see 47 CFR § 64.6207(f) and R & O 16-101, para. 34). A substantive change also includes when the certified program or a principal thereof is suspended or debarred by a federal agency.

**6. How long must certified programs retain NDBEDP records?**

Certified programs must retain NDBEDP records for 5 years.

## **B. Consumer Travel**

### **7. Must a certified program cover consumer travel?**

No. Certified programs are not obligated to cover consumer travel but may choose to do so under appropriate circumstances.

### **8. Must in-state consumer travel be pre-approved to be covered?**

Yes. In-state consumer travel must be pre-approved by the certified program and the pre-approval must be based upon, for example, program resource availability, benefits to the consumer and cost efficiencies to the program.

### **9. Must out-of-state consumer travel be pre-approved to be covered?**

Yes. Out-of-state consumer travel must be pre-approved by the NDBEDP Administrator.

### **10. Are there guidelines for consumer travel?**

Yes. Certified programs must have guidelines in place before the consumer travels that are consistent with either state, territorial, or federal travel guidance, setting reasonable limits on travel costs, including guidance on the types and ranges of costs that the state or territory will cover.

### **11. If a certified program determines that it is more cost-efficient for the consumer to travel, can it require that the consumer travel to obtain services?**

No, because the NDBEDP provides consumers a choice of whether or not to travel.

### **12. Can certified programs pay the costs of consumer travel up-front?**

Yes. A certified program may pay the costs of consumer travel up-front, including buying travel tickets, purchasing hotel lodging, paying for drivers, etc. The program should then submit the receipts for reimbursement as it normally would with its reimbursement claim.

## **C. Trainers**

### **1. Training Consumers:**

### **13. If a certified program does not have sufficient qualified trainers in-state, can a qualified trainer be brought in from another state or territory?**

Yes, if necessary, but this should be a solution of last resort. The NDBEDP will reimburse certified programs for a trainer's reasonable travel costs. If the program has questions about what might be "reasonable," please contact the NDBEDP administrator.

**14. For the purpose of tracking “staff” travel time for assessments and training, who is considered staff?**

Staff includes anyone who is conducting the assessment or training, whether the person is an employee or a contractor.

**2. Training The Trainers:**

**15. Must a certified program use its 2.5% train-the-trainer funds for train-the-trainer expenses?**

No. Programs are allotted a maximum of 2.5% of their annual or adjusted allocation to use for train-the-trainer expenses; however, if the funding is not used for train-the-trainer purposes, programs may use it for any reimbursable program expenses.

**16. Must the certified program use its train-the-trainer funding only for in-state training expenses?**

No. These funds can be used for state-run, regional, or national training programs. Other training options include, for example, one-on-one training, as well as individual, group, distance, or online activities and programs that are conducted by Helen Keller National Center or other organizations or certified programs.

**17. Can I use train-the-trainer funding to have an equipment manufacturer or vendor train my trainers?**

No. The NDBEDP does not reimburse payments to equipment manufacturers or vendors to train a trainer on equipment. However, the program will pay for the trainer’s time and travel expenses to attend a manufacturer’s or vendor’s training on a device, but not for the expense of the actual training.

**18. Can train-the-trainer funds be used to train a consumer to be a trainer?**

Yes. Certified programs and other entities are encouraged to train individuals who are deafblind to become qualified trainers, so that NDBEDP equipment recipients in turn can be trained by those with experience using and knowledge of the equipment. In addition, training individuals who are deafblind to be trainers may ultimately lead to increased employment opportunities for such individuals.

**19. Can train-the-trainer funds be used to train someone to do outreach?**

No. The NDBEDP reimburses the expenses for training program participants to use equipment distributed by the program, but not outreach.

## II. Consumer Eligibility

### A. Eligibility

#### 20. Who is considered to be “deafblind” for the purpose of NDBEDP eligibility?

The rules define an “individual who is deaf-blind” as any person:

1. Who has a central visual acuity of 20/200 or less in the better eye with corrective lenses, or a field defect such that the peripheral diameter of visual field subtends an angular distance no greater than 20 degrees, or a progressive visual loss having a prognosis leading to one or both of these conditions;
2. Who has a chronic hearing impairment so severe that most speech cannot be understood with optimum amplification, or a progressive hearing loss having a prognosis leading to this condition; and
3. For whom the combination of impairments described in 1 and 2 above causes extreme difficulty in attaining independence in daily life activities, achieving psychosocial adjustment, or obtaining a vocation.

#### 21. How is disability eligibility determined?

Under the rules (47 CFR § 64.6209(a)), a certified program shall require an individual applying for equipment and related services to provide verification of disability by either:

1. providing an attestation from a professional with direct knowledge of the individual's disability, either to the best of the professional's knowledge or under penalty of perjury, that the applicant is deafblind, or
2. providing existing documentation that the individual is deafblind, such as an individualized education program (IEP) or a Social Security determination letter.

#### 22. How does the program determine low-income eligibility when a student who is deafblind is not living with his or her family?

If the student who is deafblind could be claimed as a dependent by another taxpayer (as a qualifying child or qualifying relative), then the certified program should consider that taxpayer's family or household size and income in making an income eligibility determination.

**23. How is “income” defined for the purpose of determining income eligibility for the NDBEDP?**

“Income” is all income actually received by all members of a household. This includes salary before deductions for taxes, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, lottery winnings, and the like. The only exceptions are for payments such as student financial aid, military housing and cost-of-living allowances, and irregular income from occasional small jobs such as baby-sitting or lawn mowing. (*See [NDBEDP Report and Order](#)*, para. 71).

**24. How is “household” defined when used within the definition of income for the NDBEDP?**

A “household” is any individual or group of individuals (related or unrelated) who live together at the same address as one economic unit, where the adults (anyone eighteen years or older) contribute to and share in the income and expenses of a household.

If an adult has minimal or no income, and lives with someone who provides financial support, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians.

Where an applicant lives in a multi-person home and does not have access to the financial resources of others, such an applicant is maintaining a financially distinct identity despite the shared living space. In other words, an applicant’s income does not include the income of other adults in a household if such adults do not contribute to and share in the income and expenses of the household. By contrast, when an applicant is financially dependent upon others in a household or has income that is intertwined with those of another household member (e.g., a spouse), the applicant benefits from such financial resources, and therefore the individuals contributing to these shared funds will be considered part of the economic unit for purposes of the applicant’s income determination.

**25. What federal assistance programs will automatically qualify a person for the NDBEDP?**

- Federal Public Assistance Housing Assistance
- Supplemental Nutrition Assistance Program (SNAP)
- Medicaid
- Supplemental Security Income
- Federal Veterans Pension
- Federal Survivors Pension

This list is not exhaustive. Other assistance programs may be added to this list by the NDBEDP Administrator.

**26. Does having a job prevent an applicant from meeting the third prong of the deafblind definition, which requires that the combination of vision and hearing impairment causes extreme difficulty in attaining independence in daily life activities, achieving psychosocial adjustment, or obtaining a vocation?**

No. All applicants must meet the third prong of the definition for being deafblind, and being employed does not automatically disqualify the applicant. The attestor still must evaluate the impact of the applicant being deafblind on his or her daily life activities and psychosocial development and whether the combined disabilities cause extreme difficulty. Simply having a job does not mean that the combined disability does not cause extreme difficulty. The applicant's salary, however, cannot exceed the [federal poverty guidelines](#) (FPGs) for the program.

**27. What happens when someone who has previously received equipment applies for additional equipment or related services at least one year after their last income verification?**

The certified program must re-verify the individual's income eligibility before providing new equipment (which includes replacement of existing equipment with a different model, as well as a completely new or additional item) or related services.

The income re-verification is not needed if previously distributed equipment requires related services such as:

- repairs,
- replacement with the same model and installation,
- training on already distributed equipment or equipment replaced with the same model, or
- technical assistance.

Software upgrades that incur new additional program costs require income re-verification, while services related to software upgrades already paid for through NDBEDP do not need re-verification.

**28. Can the certified program require that the applicant seek employment to participate in the program?**

NDBEDP rules prohibit certified programs from imposing employment-related eligibility requirements for individuals to participate in the program.

**29. Can a certified program impose an age limitation on program participants?**

No. Certified programs must, however, determine the extent to which very young applicants (for example, under four) are developmentally capable of using the communications equipment and services being considered for them.



## **B. Attestations and Verification**

### **30. Can the attestations for eligibility determination be made by e-signature?**

Yes, to the extent that such form of signature is recognized as legally valid under applicable federal, state, or territorial law.

### **31. How many attestations regarding an applicant's disability verification are needed?**

Only one, if the professional who is signing the disability verification can provide a basis that adequately attests to both the vision and hearing disabilities and to the fact that the combination of both disabilities causes extreme difficulty in attaining independence in daily life activities, achieving psychosocial adjustment, or obtaining a vocation. If the attesting professional does not attest to both disabilities, different professionals will have to attest to each disability.

If one professional attests to the vision disability and another professional attests to the hearing disability, someone also must attest to the fact that the applicant is deafblind for purposes of the NDBEDP, which includes the third prong of the definition – that the combination of disabilities causes extreme difficulty in attaining independence in daily life activities, achieving psychosocial adjustment, or obtaining a vocation. That individual could be one of the two professionals, or the certified program employee could attest that, based on the two individual disability attestations and their knowledge of the applicant, the applicant meets the definition of being deafblind for purposes of the NDBEDP.

Professionals who are attesting to an applicant's disability eligibility must provide the basis for the attestation that the individual is deafblind, as that term is defined by program rules.

Examples of a sufficient basis would be any of the following:

- I reviewed the applicant's medical records.
- I reviewed the applicant's vision and hearing evaluation records.
- I have known, observed, or provided services to the applicant for a number of years.
- I am basing this attestation on my testing and assessment of the individual's hearing and observation of his or her vision ability.

### **32. How recent must the hearing and vision assessment be?**

Because a person's vision or hearing does not usually improve over time, there is no time limitation on assessments. If the applicant has sufficient documentation, even if the documentation is older, that documentation can be used to qualify an applicant. If, however, the certified program believes a person's hearing or vision has improved, and they request new equipment, the certified program must obtain reverification of their disability. Also, if a consumer requests new equipment, stating that their vision or hearing has changed, and the consumer's existing equipment is still in working order, the certified program must also reverify the disability.

**33. Can the certified program pay for the cost of copies of medical records for disability verification?**

No. The costs related to disability verification, such as copies of medical records, are not included in any of the categories of reasonable NDBEDP expenses under 47 CFR § 64.6213(c).

**34. If a certified program's application includes the state's Privacy Act Notice, should it also include the FCC's Privacy Act Notice?**

Yes. State or territorial privacy laws may differ from state to state (and territories) and from federal law. Because of these differences, and because the NDBEDP is a federal program, the FCC's Privacy Act Notice needs to be included to ensure that all federal requirements are being met.

### **III. Equipment and Related Services**

**35. When an equipment recipient moves to another state or territory, which certified program will be responsible for the upkeep of the equipment?**

When an equipment recipient relocates to another state or territory, the previous state or territory's certified program will no longer be responsible for, or permitted to seek reimbursement for, the upkeep of the recipient's equipment. In such cases, upon the request of the recipient, the former state or territory must transfer the recipient's account and any control over the distributed equipment to the new state or territory's certified program, so the recipient does not have to reapply in the new state. The certified program in the state or territory where the recipient relocates then will be responsible for the cost of upkeep of the distributed equipment. If the recipient needs new equipment after relocating, the recipient will be permitted to apply for such equipment in the new state or territory.

**36. Could one person receive two identical pieces of equipment?**

Yes. With appropriate justification (such as one for home and one for residential school housing), one person may receive two identical pieces of equipment; a certified program has the discretion to determine how it will distribute equipment.

**37. Do NDBEDP equipment recipients have a right to newer, better, or upgraded equipment when it becomes available?**

No. Because NDBEDP funding is not unlimited, certified programs must make that determination and should consider carefully how they can best use their limited funding to distribute equipment to the largest number of low-income individuals who are deafblind.

## IV. Costs and Reimbursements

**38. Are there costs that the NDBEDP will not cover?**

Yes. Please see “NDBEDP Certified Program Expenses” at Appendix A for an illustrative list of expenses that are reimbursable and those that are not.

**39. Does the NDBEDP reimburse for the cost of cables, switches, clamps, and adaptive accessories necessary to use the distributed equipment?**

Yes. The reasonable costs of cables, switches, clamps, and adaptive accessories will be reimbursed by the NDBEDP if they are necessary for the consumer to use the equipment distributed. Personal accessories that facilitate or enable other life activities are not reimbursable (e.g., a wheelchair to facilitate mobility).

**40. Are the costs of alerting devices reimbursable?**

Yes. The reasonable costs of alerting devices such as flashing lights are reimbursable when they are necessary to use the equipment distributed to make telecommunications, Internet access, or advanced communications accessible to program recipients. Assistive lighting that is used separate and apart from the distributed equipment is not reimbursable.

**41. Are the costs for batteries or upgrades reimbursable for equipment that was not distributed by the NDBEDP?**

Yes. The NDBEDP will reimburse for batteries or upgrades on equipment not distributed by the NDBEDP as long as these are reasonable and necessary to make equipment used to access telecommunications, Internet access, or advanced communications accessible to program recipients.

**42. Will the NDBEDP provide reimbursement for an inventory of loaner equipment that would be available for use when program-distributed equipment is being repaired?**

Yes. Reasonable costs are reimbursable for loaner equipment to be used when previously distributed equipment is being repaired.

**43. Can a certified program charge a recipient for damage to NDBEDP equipment, caused by the recipient’s negligence?**

A certified program should not charge a consumer for damage to NDBEDP equipment caused by the consumer’s negligence; however, in extreme cases, sanctions may be considered, e.g., no longer serving the recipient or limiting the amount of equipment the consumer may receive.

**44. Can the NDBEDP certified program pay for a portion of the cost of a piece of equipment in conjunction with another program?**

Yes, as long as the equipment is covered by the NDBEDP program rules and partial payment for the equipment is noted as part of the reimbursement request in reports to the FCC or the TRS Fund Administrator.

**45. Can the NDBEDP certified program cover the cost for the associated training on a piece of equipment that was paid for in conjunction with another program?**

Yes, as long as the equipment is covered by the NDBEDP program rules and partial payment for the equipment is noted as part of the reimbursement request in reports to the FCC or the TRS Fund Administrator.

**46. If there is another funding source to pay for equipment, could the NDBEDP cover the costs of related services (such as training) associated with that equipment, even if the NDBEDP does not cover any part of the cost of the equipment?**

No. To be reimbursed, related services must be associated with the distribution of a piece of equipment that is covered under and paid for, in whole or in part, by the NDBEDP. While the NDBEDP covers batteries and upgrades for equipment not distributed by the NDBEDP in order to avoid the need to distribute duplicative equipment to a consumer who may already have working equipment, such coverage is an exception to the general rule that every applicable related service has to correlate with a NDBEDP-distributed piece of equipment.

**47. Does the NDBEDP reimburse the cost of providing interpreter or translation services for languages other than English or American Sign Language?**

Yes, interpreter or translation services will be provided when they are needed to ensure effective communication with program recipients and to facilitate equipment distribution and the provision of related services that are permissible under the NDBEDP.

**48. Is there a limit on the amount of money a certified program can spend on each recipient?**

No, this is within the discretion of the program as long as each amount is reasonable. Should the program have questions about the reasonableness of particular expenditures, please contact the NDBEDP Administrator.

**49. Are administrative costs capped at 15% of the certified program's annual funding allocation or of the certified program's total reimbursable expenses?**

Administrative costs are capped at 15% of the certified program's total annual allocation.

50. **Are the costs of renting physical facilities for the distribution of equipment or provision of related services reimbursable?**

Yes. The cost of renting physical facilities is reimbursable as an administrative expense, subject to the 15% cap for administrative expenses.

51. **Is there a cap on certified programs' state and local outreach?**

There is a soft cap of 10% of a state or territory's annual allocation for state and local outreach. If a certified program wishes to exceed this cap, it must seek prior approval from the NDBEDP Administrator.

52. **If funds are reallocated from the certified program in a way that results in a newly adjusted allocation that is less than the program's original allocation, will the program's administrative cap be reduced in accordance with the program's reduced allocation?**

Yes. If the newly adjusted allocation is less than the program's original allocation, the 15% administrative cap will be reduced accordingly.

53. **If funds are reallocated from the certified program in a way that results in a newly adjusted allocation, and the program already spent an amount for administrative expenses based on the original allocation that exceeds the newly calculated 15% cap on administrative expenses, will the NDBEDP take back the difference?**

No, the NDBEDP will not seek to recoup administrative costs that the program has already spent should a reallocation result in a decreased administrative expense allocation.

54. **If the certified program has funds reallocated in a way that increases the program's annual allocation, will the administrative cost cap increase?**

Yes. If the newly adjusted allocation is greater than the certified program's original allocation, the 15% administrative cap shall be increased accordingly.

55. **What should I do if I think my certified program may have a conflict of interest with an equipment manufacturer or vendor?**

Certified programs must disclose to the FCC actual or potential conflicts of interest with equipment manufacturers or vendors, as well as the steps that the entity intends to take to eliminate the conflict or minimize the associated risks.

## V. Reports and Data

### 56. **Can certified programs use the centralized database to determine if program applicants have received NDBEDP equipment in another state or territory?**

Certified programs cannot see any program data other than their own, and are not able to query the database for data of consumers being served in other states or territories. Data queries for consumers being served in other states or territories must be conducted by the NDBEDP Administrator.

### 57. **Must all certified programs use the centralized database?**

Programs must use the centralized database for reporting, but its use for reimbursements is optional.

### 58. **What types of information are included on the FCC's iCanConnect website?**

In addition to general information about the NDBEDP, the iCanConnect website at <http://www.icanconnect.org/> contains contact information for the NDBEDP certified program in each state or territory, including (if available) the program's telephone, TTY, videophone, and fax numbers as well as the program's e-mail, mailing, and website addresses.

## VI. Audits

### 59. **Annual Audit Requirement: "Each program certified under the NDBEDP must . . . engage an independent auditor to perform annual audits designed to detect and prevent fraud, waste, and abuse . . ." What guidance should we give to auditors conducting annual audits? (47 CFR § 64.6211(a)(7))**

Pursuant to the [NDBEDP Permanent Order](#) and FCC rules, certified programs shall conduct independent annual audits to ensure the fiscal integrity of the NDBEDP. The program audit standard is comparable to that required under the Single Audit Act and 2 CFR part 200, subpart F (which superseded OMB Circular A-133) and does not need to comply with standards such as a forensic standard. The FCC will accept audit reports from audits conducted in accordance with the Single Audit Act instead of an independent audit, even if the NDBEDP is not specifically reviewed within that audit. If your organization does not participate in a Single Audit, you must conduct an independent annual audit pursuant to the NDBEDP's rules.

The annual independent audit must include a traditional financial statement audit, as well as an audit of compliance with the NDBEDP rules that have a direct and material impact on NDBEDP expenditures and a review of internal controls established to ensure compliance with the NDBEDP rules.

Compliance areas to be audited as part of the independent audit must include, but are not limited to, allowable costs, participant eligibility, equipment distribution, and reporting. The audit report must describe any exceptions found, such as unallowable costs, lack of participant eligibility documentation, and missing reports, and must include the certified program's view as to whether each compliance exception is material and whether any internal control deficiencies are material. The audit report must also include the certified program's plan for correcting any noted audit findings.

If the auditor finds evidence of fraud, waste, or abuse, the auditor must take appropriate steps to discuss it with the certified program's management and the Commission and report the auditor's observations as required under professional auditing standards.

**60. Must certified programs submit copies of annual audit reports to the FCC?**

Yes, the report from an independent annual audit or an audit conducted in accordance with the Single Audit Act must be submitted to the NDBEDP Administrator. The program should submit its final audit report to the NDBEDP Administrator within 30 days after receiving it from the auditor.

**61. What happens if a program fails to participate in an FCC-arranged audit?**

The program will be subject to automatic suspension of payments until it agrees to the requested audit.

## **VII. Complaints**

**62. How can an individual file a complaint with the FCC?**

Individuals have multiple options to contact the FCC to file a complaint or seek assistance:

- File a complaint online at [fcc.gov/accessibilitycomplaints](https://www.fcc.gov/accessibilitycomplaints)
- By phone: 202-418-2517; ASL: 1-844-432-2275
- By email: [dro@fcc.gov](mailto:dro@fcc.gov)
- By mail:

Federal Communications Commission  
Consumer and Governmental Affairs Bureau  
Consumer Inquiries and Complaints Division  
45 L Street, NE  
Washington, DC 20554

**63. How will NDBEDP complaints be processed?**

Complaints containing enough information to proceed will be forwarded to the certified program involved for a response, if the consumer agrees. If the program's response does not resolve the complaint, then the NDBEDP Administrator will attempt to help resolve the complaint. The complainant and the certified program will be involved in resolving the complaint and will be informed of the disposition.

**64. What happens if a complainant is not satisfied with the disposition of the complaint?**

If not satisfied with the response to an informal complaint, the complainant can file a formal complaint with the FCC. Formal complaint proceedings are similar to court proceedings. Each party must comply with specific procedural rules, appear before the FCC and file documents that address legal issues. Parties filing formal complaints usually are represented by lawyers or experts in communications law and the FCC's procedural rules. Complete information on how to file formal complaints can be found in sections 1.720 through 1.740 of the FCC's rules, located at 47 C.F.R. §§ 1.720 – 1.740. In resolving the complaint, the FCC can conduct whatever inquiries and proceedings are deemed necessary to enforce the NDBEDP's requirements. See also [47 CFR Sec. 64.6217\(c\)](#) (NDBEDP's complaint procedures) as well as FCC's "Filing a Complaint Questions and Answers" at this link: <https://consumercomplaints.fcc.gov/hc/en-us/articles/205082880-Filing-a-Complaint-Questions-and-Answers>.

**65. Do individuals have to file complaints first with their certified programs before filing with the FCC?**

No. Individuals can file complaints directly with the FCC, though filing complaints with the certified program might be the easiest and fastest way to get the issue resolved.

**66. What are the whistleblower protections for the NDBEDP?**

According to [47 CFR § 64.6219](#), NDBEDP certified programs shall permit, without reprisal in the form of an adverse personnel action, purchase or contract cancellation or discontinuance, eligibility disqualification, or otherwise, any current or former employee, agent, contractor, manufacturer, vendor, applicant, or recipient, to disclose to a designated official of the certified program, the NDBEDP Administrator, the TRS Fund Administrator, the Commission, or to any federal, state, or territorial law enforcement entity, any known or suspected violations of the Communications Act or Commission rules, or any other activity that the reporting person reasonably believes to be unlawful, wasteful, fraudulent, or abusive, or that otherwise could result in the improper distribution of Equipment, provision of services, or billing to the TRS Fund.

NDBEDP certified programs shall include these whistleblower protections with the information they provide about the program in any employee handbooks or manuals, on their Web sites, and in other appropriate publications.



## VIII. For More Information

### 67. My question is not answered here. Where can I go for more information?

For general information visit the Commission's NDBEDP website:

<https://www.fcc.gov/general/national-deaf-blind-equipment-distribution-program>; or the NDBEDP website on state or territorial programs and services at: [www.iCanConnect.org](http://www.iCanConnect.org); or call 1-800-825-4595.

**NDBEDP Consumer Guide:** [HTML](#) || [PDF](#)

**NDBEDP Rules:** [47 CFR § 64.6201-64.6219](#)

**NDBEDP Enabling Statute:** Section 105 of the [Twenty-First Century Communications and Video Accessibility Act \(CVAA\)](#), adding section 719 to the Communications Act of 1934, as amended, codified at [47 USC § 620](#). Pub. L. No. 111-260, section 105, 124 Stat. 2751, 2762 (2010); Pub. L. No. 111-265, 124 Stat. 2795 (2010).

**NDBEDP Permanent Program Order:** *Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, Section 105, Relay Services for Deaf-Blind Individuals*, [Report and Order](#), CG Docket No. 10-210, 31 FCC Rcd 9178, 9265-66, para. 205 (2016).

For specific questions, contact Jackie Ellington, NDBEDP Administrator at: [Jackie.Ellington@fcc.gov](mailto:Jackie.Ellington@fcc.gov) and [NDBEDP@fcc.gov](mailto:NDBEDP@fcc.gov); or (202) 418-1153.

## IX. Appendix A: NDBEDP Certified Program Expenses

The following list includes examples of expenses that may be reimbursable up to each state or territory's annual funding allocation and to the extent that the expenses incurred are reasonable. Paragraph G lists examples of expenses that are not reimbursable.

- A. Equipment to make telecommunications service, Internet access service, and advanced communications accessible to low-income individuals who are deafblind, including:
  - 1. Specialized customer premises equipment,
  - 2. Off-the-shelf equipment,
  - 3. Hardware,
  - 4. Software,
  - 5. Applications,
  - 6. Upgrades and replacements,
  - 7. Loaner equipment for use while distributed equipment is being repaired,
  - 8. Accessories, such as switches and clamps, required to enable the individual to access the equipment,
  - 9. Devices to alert individuals that they are receiving a communication through the distributed equipment, such as flashing lights,
  - 10. Equipment shipping expenses,
  - 11. Partial payment for a piece of NDBEDP equipment, when another entity pays remaining balance,<sup>1</sup>
  - 12. Batteries or upgrades for eligible equipment that was not distributed by the NDBEDP, and
  - 13. Other types of equipment that make telecommunications service, Internet access service, and advanced communications accessible to individuals who are deafblind.
  
- B. Individualized assessments of applicant eligibility and communication needs, including:
  - 1. Applicant eligibility verification (deafblind disability and low-income),
  - 2. Communications assessments, such as assessments conducted by assistive technology specialists (but not assessments to determine program eligibility),
  - 3. Travel expenses for personnel conducting communications assessments, such as for mileage, lodging, food, support service providers,<sup>2</sup> drivers, and travel time,
  - 4. Auxiliary aids and services, such as sign language interpreter services, to ensure effective communication with individuals who are deafblind,

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<sup>1</sup> There must be a clear delineation between the multiple funding sources in all reporting to the FCC and the TRS Fund Administrator.

<sup>2</sup> Support service providers (SSPs) are specially trained professionals who enable people who are deafblind to access their environments and make informed decisions. SSPs provide visual and environmental information, sighted guide services, and communication accessibility. See <http://www.aadb.org/information/ssp/ssp.html>. For purposes of NDBEDP, SSPs are provided for personnel providing NDBEDP services, not for consumers receiving services because SSPs are considered employee accommodations.

5. Reasonable intra-state travel expenses incurred by consumers travelling to a site within their home state or territory for assessment,
6. Reasonable inter-state travel expenses incurred by consumers travelling to a site outside their home state or territory for assessment,<sup>3</sup> and
7. Other expenses related to eligibility and communications assessments.

C. Installation and training, including:

1. Equipment installation,
2. Individualized consumer training on how to use distributed equipment (e.g., how to use a specific e-mail program or installed application on a PC, or how to use a specific keyboard or other computer component necessary to use the distributed equipment),<sup>4</sup>
3. Reasonable travel expenses for installation and training personnel, such as for mileage to reach clients who live in rural or remote areas, support service providers, or drivers,
4. Instructional materials in an accessible format that are necessary for the use of the distributed equipment,<sup>5</sup>
5. Auxiliary aids and services, such as sign language interpreter services, to ensure effective communication with individuals who are deafblind,
6. Reasonable intra-state travel expenses incurred by consumers travelling to a site within their home state or territory for installation or training,
7. Reasonable inter-state travel expenses incurred by consumers travelling to a site outside their home state or territory for installation or training,<sup>6</sup>
8. Train-the-trainer expenses (up to 2.5% of the total annual or adjusted allocation), and
9. Other expenses related to installation and training (including personal protective equipment (PPE) – disposables and supplies that will be used with consumers such as gloves, masks, antiseptic wipes and sprays, smocks, gowns, and thermometers).

D. State and local outreach and education (up to 10% of the total annual or adjusted allocation, unless approved by the NDBEDP Administrator), including:

1. Outreach and education events and activities, such as conducting workshops at deafblind-related conferences, hosting program exhibit booths, and responding to program inquiries,
2. Program information development and production in accessible formats for the public or applicants (e.g., flyers, application forms, public service announcements, advertisements, and press releases),
3. Accessible program website development and maintenance,

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<sup>3</sup> This expense requires pre-approval by the NDBEDP Administrator before the costs are incurred.

<sup>4</sup> This training is not intended to include general typing lessons.

<sup>5</sup> The NDBEDP will not reimburse the costs of making user manuals or guides used with mainstream or specialized equipment accessible. This is because manufacturers and service providers must ensure that the information and documentation that they provide to customers is accessible, if readily achievable (for telecommunications under section 255) or achievable (for advanced communications manufacturers and service providers under section 716).

<sup>6</sup> This expense requires pre-approval by the NDBEDP Administrator before the costs are incurred.

4. Reasonable in-state travel expenses for outreach personnel,<sup>7</sup> support service providers, or drivers, such as expenses for mileage to and from outreach events,
  5. Auxiliary aids and services, such as sign language interpreter services, to ensure effective communication with individuals who are deafblind, and
  6. Other reasonable expenses related to outreach and education.
- E. Equipment maintenance, repairs, and warranties, including:
1. Equipment warranties,
  2. Equipment maintenance and repairs that are not covered under a warranty,
  3. Return and refurbishment of equipment that is no longer needed by the recipient, and
  4. Other expenses related to equipment maintenance, repairs, and warranties (including sanitizing equipment, such as UV wands and light chambers).
- F. Administrative costs – capped at 15% of the total annual or adjusted allocation for equipment distribution and related services – related to:
1. Reporting requirements,
  2. Accounting,
  3. Regular audits,
  4. Program oversight,
  5. Development of program documents for internal use, such as verification of disability and low-income,
  6. Physical facilities to conduct assessments, demonstrate equipment, or provide training, and
  7. Other reasonable expenses related to program administration (including PPE – disposables and supplies that will be used in the office such as gloves, masks, antiseptic wipes and sprays, smocks, gowns, and thermometers).
- G. Expenses that are not reimbursable by the NDBEDP include:
1. Costs that exceed the certified program’s annual or adjusted funding allocation,
  2. Separately invoiced training of family members, personal attendants, or others who might provide support on how to use and maintain the distributed equipment (others may be trained on how to use and maintain the equipment if such training occurs at the same time as the training for the equipment recipient and there is no additional cost incurred for training additional people; the NDBEDP only reimburses costs incurred for training the equipment recipient),
  3. Telecommunications, broadband or advanced communications services,
  4. Equipment or devices that facilitate other life functions (e.g., hearing aids or wheelchairs),
  5. Braille instruction,
  6. English or other language skills instruction, such as reading or writing,
  7. Keyboarding skills or basic computer skills instruction,

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<sup>7</sup> The NDBEDP does not reimburse client travel expenses for outreach.

8. Training to use equipment that was not distributed by an NDBEDP certified program,
9. Conversion of equipment user manuals or guides into accessible formats,
10. Assistive lighting (unrelated to signaling devices to alert user to an incoming call),
11. Administrative expenses that exceed 15% of the certified program's total or adjusted annual allocation,
12. Train-the-Trainer expenses that exceed more than 2.5% of the certified program's total or adjusted annual allocation, and
13. Other expenses determined by the NDBEDP Administrator to be not reimbursable.