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## Division for the Visually Impaired

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*2021 Holdover Meeting*

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*Virtual Zoom Meeting  
Tuesday, February 9, 2021  
3:00 p.m.*

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Holdover Supplement Prepared by  
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**Senator Stephanie L. Hansen**

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**JOINT LEGISLATIVE OVERSIGHT AND SUNSET COMMITTEE**

**Joint Legislative Oversight and  
Sunset Committee Holdover Meeting**

**Virtual Meeting via Zoom  
Public Access via [YouTube](#)**

**Tuesday, February 9, 2021  
3:00 p.m.**

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**Agenda**

1. Welcome
2. Minutes
3. Holdover Update: Division for the Visually Impaired
4. Adjournment

The public may submit written comments to [Sunset@Delaware.gov](mailto:Sunset@Delaware.gov).

Public access via YouTube:

<https://www.youtube.com/channel/UCmePiLcN2Ee8cWOEBuUxG1g>

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# DVI HOLDOVER CONTENTS



OVERVIEW



JULY UPDATE



DEC UPDATE



LEGISLATION



RECOMMENDATIONS



ANALYST  
RECOMMENDATION

# OVERVIEW

Services for visually impaired Delawareans originated in 1906, through the Delaware Commission for the Blind (“Commission”). In 1909, the General Assembly codified the Commission, making it Delaware’s first state agency, to provide gainful employment for those without sight. The Commission relocated to the Department of Health and Social Services (“DHSS”) in 1970 and hired an itinerant education teacher to provide services to blind students in public schools. This itinerant model is still in use today.

The Commission officially became known as the Division for the Visually Impaired (“DVI”) in 1978. The name and structure change reflected the growing needs for specifically trained and educated instructors, counselors, and staff in visual impairments and blind services, and to provide specific individual services to the visually impaired and blind residents of Delaware. DVI currently works in partnership with the consumer and community to improve the safety, education, and employment of blind and visually impaired Delawareans. DVI provides a continuum of services to over 3,300 residents with visual impairments. Services include itinerant education services, vocational rehabilitation, independent living, orientation and mobility, assistive technology, and serves as the state licensing authority under the Randolph-Sheppard Act.

The Joint Legislative Oversight and Sunset Committee (“JLOSC” or “Committee”) selected DVI for sunset and oversight review on June 12, 2018. After the completion of a draft report in March of 2019, the Committee held a presentation meeting on April 2, 2019, and received a presentation from the agency as well as comments from the public. On May 9, 2019 the Committee considered 31 recommendations for DVI, tabled 28, and adopted 3, which included forming a task force to review the tabled recommendations.

The task force commenced meetings on August 14, 2019 and held a total of 6 that engaged with the public and various stakeholders. Committee staff completed additional research and gained additional perspectives on the previously drafted recommendations for the sunset and oversight review of DVI. An overview of this information was presented to the Committee at the first DVI holdover meeting held on January 28, 2020.<sup>1</sup> At the conclusion of that meeting, the Committee adopted the Committee Analyst’s recommendation to allow the Committee’s staff to revise the DVI recommendations within the scope of the JLOSC review process and based on all research obtained. JLOSC reviewed and adopted revised recommendations for DVI at their February 20, 2020 meeting which addressed the matters identified in both the *2019 JLOSC Final Report* and the *2020 Final Report of the JLOSC Task Force on DVI*.<sup>2</sup> Adopted recommendations highlighted the following key areas in need of strength and support:

- Statute
- Staffing
- Policy
- Funding
- Communication
- Education Services

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<sup>1</sup> Appendix A: Fact Sheet for JLOSC Task Force on DVI.

<sup>2</sup> Both reports are accessible on the JLOSC website: [https://legis.delaware.gov/Committee/Sunset/2019\\_JLOSCReviews](https://legis.delaware.gov/Committee/Sunset/2019_JLOSCReviews)

# JULY UPDATE

## **Additional Statutory Updates (Recommendation 3)**

- House Bill 301 enacted on June 22, 2020.
  - Removed the Business Enterprise Program (“BEP”) participants from the state pension plan.
    - BEP participants are not State employees; inclusion in the State Pension Plan or payroll system did not comply with the Randolph-Sheppard Act.

## **Analysis of Agency Structure – Staff and Funding (Recommendation 4)**

- DVI repurposed two Vocational Rehabilitation (“VR”) program positions to focus on areas in need of development.
  - Position 1: Coordination and provision of Pre-Employment Training Services (Pre-ETS) for transition youth (filled December 2020).
  - Position 2: Hybrid role that includes more targeted career development for both transition students and adults (vacant, recruiting process continues).
- DVI is part of the Equitable Infrastructure Committee, a sub-committee of the Special Education Strategic Plan Advisory Council (“SESPAC”).
  - Developed a proposed plan for creating equitable education services and funding across the state for students served through Autism Spectrum Disorder, Deaf, Hard of Hearing, Deaf-Blind, and Visual Impairment programs.<sup>3</sup>
- DVI developed a position to provide more assistive technology (“AT”) support, technical assistance and training to students and district personnel.
  - This position was filled in early 2020 and has not been fully implemented due to the pandemic.
- Trainer/Educator collaborated with education and VR staff to provide remote summer programming, supporting students with remote learning, repairing Braille so they can be used by students, and familiarizing with new equipment.

## **Agency Staff – Training (Recommendation 5)**

- DVI is in the process of contracting with national experts and former federal Rehabilitation Services Administration staff, which will allow for more focused fiscal training related to federal reporting and policy development.
  - Mandt System® is great training, but expensive, alternatives explored.

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<sup>3</sup> Appendix B: Equitable Infrastructure Committee PowerPoint presentation describing the background, purpose and recommended plan.



- VR program is working with the VR Development Group to explore VR specific training and the possibility of purchasing a Learning Management System specific to foundational VR and disability related professional development.
- DVI is hiring a Training Coordinator who has a tremendous amount of experience and education related to training and communications (anticipated start date in August 2020).
  - The Training Coordinator will conduct a training needs assessment and create a comprehensive training plan for all staff.
- In order to use tools that are available to all state employees, DVI is exploring the option of obtaining a license for the Delaware Learning Center (“DLC”) which would allow the agency to develop and conduct online training specific to the needs of DVI staff.
- DVI started work with the Statewide Training Program to conduct the DiSC assessment for the agency with an emphasis on the leadership team.<sup>4</sup>

### **Policy and Procedure Manual (Recommendation 6)**

- DVI has been reviewing its policies and procedures, researching other states with similar agencies to develop a comprehensive manual.
- DVI is working with the Division of Human Resources (“DHR”) to utilize resources that are available and applicable to DVI.
- In response to the national shortage of both Teachers for the Visually Impaired (“TVI”) and Orientation & Mobility Specialists, DVI is researching the practices of other agencies that serve the blind and visually impaired for more strategic targeting of recruitment candidates.

### **Create Agency Program Specific Policy and Procedure Manuals (Recommendation 7)**

- DVI has researched the policies and procedures from other states and has a draft policy and procedure manual that addresses the individual units within DVI.
  - The manual is currently being edited and reviewed to ensure it is revised and comprehensive.
- The DVI VR team is working on policy revisions to enhance service delivery.
  - VR team staff received training on May 29, 2020 for the new Pre-Employment Transition Services policy, conducted with the Workforce Innovation Technical Assistance Center on Transition.

### **Education Services – Funding (Recommendation 8)**

- DVI is part of the Equitable Infrastructure Committee, a sub-committee of SESPAC.
  - Developed a proposed plan for creating equitable education services and funding across the state for students served through Autism Spectrum Disorder, Deaf, Hard of Hearing, Deaf-Blind, and Visual Impairment programs.

### **Education Services – Communication (Recommendation 9)**

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<sup>4</sup> DiSC is an acronym that stands for the four main personality profiles described in the DiSC model: (D)ominance, (i)nfluence, (S)teadiness and (C)onscientiousness. DiSC® is a personal assessment tool used by more than one million people every year in thousands of organizations around the world, from sprawling government agencies and Fortune 500 companies to nonprofits and small businesses to help improve teamwork, communication, and productivity in the workplace.

- DVI and the DOE Liaison to DVI have established a good working relationship. Meetings and communication occur regularly to ensure the two agencies are operating in alignment. This has been particularly important and helpful during the pandemic.
- DOE was a member of the JLOSC Taskforce on DVI and is aware of the recommendations and will be working with DVI to address them.
- DVI and DOE have been meeting over the past several months to review the current Memorandum of Understanding (“MOU”) and identify areas that require revisions, clarity, or more information.
  - The next step is to work with additional partners to draft the revisions and obtain stakeholder input.
  - DVI understands the importance of developing a comprehensive MOU that clearly outlines roles and responsibilities as well as communication expectations.
  - In conjunction with recommendation 7 and in alignment with the MOU, the Education Coordinator is developing and revising policies and procedures as outlined above.
- Continued support of the proposed plan from the Equitable Infrastructure Committee could positively impact DVI’s education services and structure.
  - Bringing strength to processes and communication between DVI and DOE under the current structure will continue to be a priority.

### **Accessibility of DVI Offices (Recommendation 10)**

- DVI continues to work with various state agencies to address and implement accessibility measures at office locations.
  - Barriers associated with rerouting bus routes or relocating offices have multiplied because of the fiscal climate.
  - To implement timely change, DVI developed a partnership with Delaware Libraries.
    - The intent is to secure storage and training space within libraries so DVI Technology Trainers can accommodate assistive technology needs by working with consumers at libraries located on fixed bus routes.
    - This community-based, cost-neutral solution affords consumers the comforts of traveling less while receiving services in an accessible environment.
    - DVI has secured free space at the Georgetown Public Library and is beginning the MOU development process.
      - Plan is to pilot the services in Sussex County, then identify other accessible locations.
- In addition to improving physical accessibility for consumers, DVI recognizes the importance of having adequate staffing to address consumer needs.
  - DVI submitted the recruiting packet for a Technology Trainer to work in Kent and Sussex Counties.
  - DVI recently repurposed a Trainer/Educator position to focus on students in K-12 programs statewide.

- The pandemic impacted services across the state, DVI staff and consumers quickly adjusted to incorporate more remote teaching and learning to maintain critical services to consumers.
  - Although not all services can be provided in a remote fashion and all consumers are not comfortable with this mode of instruction, DVI has noticed an increase in participation for some consumers where meeting face-to-face was previously difficult.
  - DVI anticipates offering a hybrid approach to services in the future to provide consumers with more service delivery options.

### **Boards, Committees, or Councils related to DVI (Recommendation 11)**

- Prior to the COVID-19 pandemic, DVI was in the process of securing a third-party contractor, Dr. Fred Schroeder, an expert of state and federal government operations, to conduct the evaluation of Boards, Committees, and Councils related to DVI.
  - Since the fiscal climate has taken a dramatic shift, DVI is no longer able to afford the costs associated with Dr. Schroeder and is developing an alternate plan to either identify a qualified person within the state government or a contracted consultant from the state procurement vendors.

### **Follow Up Reporting (Recommendation 12)**

- DVI submitted the first progress update on July 31, 2020.

# DEC UPDATE

## **Additional Statutory Updates (Recommendation 3)**

- DVI continues to work with JLOSC staff on legislation.

## **Analysis of Agency Structure – Staff and Funding (Recommendation 4)**

- DVI repurposed 2 positions in the VR program to align with requirements in the Workforce Innovation Opportunity Act (“WIOA”) and respond to the needs of job seekers and employers.
  - Pre-Employment Transition Coordinator position filled as of Dec. 2020.
  - The Career Development position remains vacant after several job postings and interviews.
    - Brainstorming new ways to recruit for this position.
- Several excellent candidates for the Kent/Sussex County Technology Trainer position that will be the new remote trainer in Georgetown.
  - Extended a job offer and negotiating terms with the candidate.
- Update on filled Trainer/Educator II (“TE II”) position for students.
  - Individualized services based on student needs, position designed to offer a broader array of services including assessment and evaluation, researching options, making recommendations, training, referral, and troubleshooting primarily for transition aged students.
  - Coordinates with students, families, local education agencies, and DVI staff, including TVI, VR Counselor, and Vision Rehabilitation Therapist to ensure a team approach to services is provided both for current needs and to help the student plan for post high school goals.
  - Pandemic impacted how DVI provides services.
    - Creative solutions implemented to ensure students and families continue to receive the services necessary.
    - Proper safety protocols in place, some students and families are agreeable to in-person services.
      - When in-person services are not possible, TE II delivers trial equipment for use until a formal evaluation can be completed.
      - Offer remote training and recommend online resources for additional training videos and webinars.
    - TE II maintains regular communication with students and families to keep them engaged during this unique time of remote learning.
    - TE II offering remote training to school personnel with plans to provide more in-person training to school staff once pandemic restrictions lift.

- DVI continues to participate in the Equitable Infrastructure Committee.
  - Sub-committee of SESPAC which continues to present the proposal to stakeholders for a statewide entity for students served through Autism Spectrum Disorder, Deaf, Hard of Hearing, Deaf-Blind, and Visual Impairment programs.
    - Receiving a tremendous amount of support.
- Internal changes:
  - Central intake process moved to a team approach.
  - Increased support to the Education Program.
  - Designated additional support to the Education and Orientation & Mobility Programs.
  - Launched an organizational development initiative to evaluate agency structure, identify needs, and develop comprehensive training and communication plans.
  - Hired a Training and Communications Director (August 2020) assisting the DVI Leadership Team with aligning goals and priorities with the DHSS Strategic Plan to better identify potential structural and funding needs for the agency. Below is a draft outline of immediate objectives:
    1. Leadership Training (Oct.) – DiSC Behavior Styles – Awareness of self and others. Applicable to teambuilding, improved communications, and respect for differences.
      - a. Preparation (of Leadership) for November Planning Meetings.
    2. Addressing Organizational Development needs through structured planning (Nov.) with outcomes that include aligning DVI goals & objectives with DHSS Strategic Goals, creating a Training Plan and Communications Plan.
      - a. Developing a New Employee Orientation program.
      - b. Developing an Individual Development Plan (“IDP”) for staff to align expectations with manager and demonstrate action to improve knowledge, skills & abilities.
      - c. Developing a multi-approach Training Needs Assessment.
        - Longer-term project that requires careful planning and collaboration both internally and externally.
        - Optimistic about the changes occurring within DHSS and the additional focus placed on divisions that serve special populations.
        - Plans to explore options for sharing resources and enhancing collaborations.

**Ongoing Plan:** DVI is just starting the organizational development initiative so further planning is needed. However, critical areas related to structure and funding will be considered as DVI progresses with this initiative and consult with the department.

## **Agency Staff – Training (Recommendation 5)**

- In August 2020, DVI started working with consultants who are national experts on the VR program, Dr. Fred Schroeder and Seymour Levy (former federal Rehabilitation Services Administration Commissioner and fiscal staff).
  - They provided DVI with helpful interpretations of the federal regulations, assisted with identifying new procedures that comply with the regulations, and reviewed and revised policies and procedures to reflect the required changes.
  - Working to develop a more comprehensive training for all fiscal and VR staff.
    - Training will include an overview of key areas of the federal regulations, information on the new federal reporting requirements for FFY21, policies and procedures, internal controls, obligation date, and period of performance.
- The DVI VR Program acquired a Learning Management System (“LMS”) to enhance staff development.
  - The system is hosted by the VR Development Group.
  - Currently has 65 courses available.
  - System has the scalability to add personalized programmatic training to further promote effective case management and successful closure strategies.
  - New VR staff are using LMS.
  - LMS will be incorporated into the larger training plan for DVI.
    - Other program staff play a role with assisting individuals prepare for and obtain employment, it is important for them to be cross trained and understand how they contribute to and best support the VR process.
- DVI is also working with Ashley Kavanagh at Statewide Training to receive guidance on how to use the Delaware Learning Center (“DLC”) for DVI specific purposes.
  - Features are available at no additional cost.
  - Ashley Kavanagh will provide training to key DVI personnel for the DLC to be used more effectively for training.
- DVI hired a Training and Communications Director (August 2020).
  - Prior experience working as a Training Administrator with the Delaware Department of Labor.
  - Background in organizational development, training, and communications.
  - Well suited to assist DVI with developing an agency-wide training plan, as well as work with individual programs to address their specific needs.
  - DVI has several programs with specific training needs and challenges.
    - This position will streamline training to meet program specific needs and incorporate them into the larger agency plan.
      - This assists DVI beyond just training; and will help to inform recruitment and retention efforts and address succession planning.
  - Extensive experience with DiSC training.
    - Provided the training as a kick-off to DVI’s organizational development initiative.

- Continue to incorporate training materials and outcomes into future planning and leadership meetings.
- Continue work with each program administrator to provide the training for all staff.

**Ongoing Plan:** DVI included additional documents (Training & Organizational Summary, DVI Training Project Matrix, and DVI Strategic Goal Matrix) that outline priorities as an agency and specifically relate to training.<sup>5</sup> Although they are still in development, the Training Project and Strategic Goal Matrix documents provide DVI with key deliverables, measures of success, responsible parties, and a timeframe to follow. DVI has reported several large priorities and plenty of ongoing work to do, and their ability to achieve goals and sustain the work is greater when they are thoughtful about their planning, solicit input from staff and stakeholders, and can demonstrate progress on their goals. This is a long-term project that will need periodic adjustments.

### **Agency Staff – Policy and Procedure Manual (Recommendation 6)**

- Division of Human Resources (“DHR”) and the Department of Health and Social Services (“DHSS”) provided State and Department policies to DVI.
  - DVI ensured staff had quick access.
  - DVI used policies for reference for the creation of new Division policies.
- DVI reviewed current agency policies and procedures.
  - Gaps were identified and work began on a new Employee Manual.
- DVI’s new Employee Manual recently completed, ready for initial review and approval.<sup>6</sup>
  - Updated with additional policies as created or modified.
  - Newly created policies:<sup>7</sup>
    - Pandemic Operations Policy and Pandemic Acknowledgement Form.
    - DVI Fleet policy; completed fourth quarter of FY19.
    - Intern & Volunteer Policy and Intern & Volunteer Manual; completed second quarter of FY2020.
    - Division Trauma Informed Care Policy; completed third quarter of FY2020.

**Ongoing Plan:** The next step is to ensure DVI employees receive training and guidance as the policies are implemented. In addition, DVI plans to develop a system that outlines procedures for the development or revision of policies and procedures. The system will also include tools for assuring policies are reviewed and updated regularly or at the very least annually. Both the DVI Director and Deputy Director have extensive experience with developing and maintaining practical and useful policies and procedures. DVI recognizes the importance of properly training staff and routinely refer to policy to ensure they are operating within the guidelines. There was not enough time to reinvent all policies and fill all the gaps but DVI made significant progress. The past eight months have been uniquely challenging; however, focusing on improving and creating policies to support the staff will remain a priority.

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<sup>5</sup> Appendix C: DVI Recommendation 5 Documents.

<sup>6</sup> Appendix D: DVI Recommendation 6 Documents.

<sup>7</sup> Appendix D: DVI Recommendation 6 Documents.

## **Create Agency Program Specific Policy and Procedure Manuals (Recommendation 7)**

- DVI conducted a review of service delivery policies for all programs, identified gaps, and prioritized how the work would proceed in 2 steps:
  - Step 1 - The review proved that most programs were operating with comprehensive policies that needed immediate revisions to streamline content and improve the flow and reformatting to reduce navigation challenges.
  - Step 2 - Additional revisions focus on corrections such as, identifying and eliminating redundancies of shared processes (i.e. Client Intake) and further refining/enhancing program processes.<sup>8</sup>
    - DVI focused attention on gaps in service-related policies and developed an outline of the future structure of DVI policy content.<sup>9</sup>
      - The list is expected to evolve as leadership continues to engage in policy review.
- DVI has created drafts of 6 new policies including:
  - Accessible Communication.
  - Accessing Interpreter Services.
  - Case Documentation.
  - Case Record Review.
  - Confidentiality, Informed Consent, Release of Information.
  - Grievances.
  - Participant Record Maintenance and Review.
  - DVI Blind Registry.

**Ongoing Plan:** The next step is to ensure DVI employees receive training and guidance as the policies are implemented. In addition, DVI plans to develop a system that outlines procedures for the development or revision of policies and procedures. The system will also include tools for assuring policies are reviewed and updated regularly or at the very least annually. Both the DVI Director and Deputy Director have extensive experience with developing and maintaining practical and useful policies and procedures. DVI recognizes the importance of properly training staff and routinely refer to policy to ensure they are operating within the guidelines. There was not enough time to reinvent all policies and fill all the gaps but DVI made significant progress. The past eight months have been uniquely challenging; however, focusing on improving and creating policies to support the staff will remain a priority.

## **Education Services – Funding (Recommendation 8)**

- DVI continues to participate in the Equitable Infrastructure Committee and meet with stakeholders to present the proposed plan for creating a statewide entity for students served through Autism Spectrum Disorder, Deaf, Hard of Hearing, Deaf-Blind, and Visual Impairment programs.<sup>10</sup>

**Ongoing Plan:** DVI intends to fully participate in this collaboration if there is continued support for DVI to remain involved, which support appears to be present. As DVI is not currently associated with a local education agency, DVI is discussing how they would make this transition

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<sup>8</sup> Appendix E: DVI JLOSC Recommendations Progress Report 2020 (policy update tables on page 8).

<sup>9</sup> Appendix F: DVI Recommendation 7 Documents.

<sup>10</sup> Appendix E: 2020 JLOSC Recommendations Progress Report DVI (presentation summary chart on page 11).



while ensuring availability of the wraparound services from other DVI programs (Instructional Materials Resource Center, Orientation & Mobility, Independent Living Services, Assistive Technology, and Vocational Rehabilitation).

The next steps for this project include:

1. Continue to engage and seek feedback from stakeholders.
2. Develop core positions.
3. Construct funding.
4. Identify and propose legislative code changes.
5. Implement, assess, and adjust.

## **Education Services – Communication (Recommendation 9)**

- DVI working on several measures to improve communication with the Department of Education (“DOE”).
  - Resulting in a better collaboration and enhanced services for students and their families.
- DHSS in development of specialized Customer Relationship Management (CRM) software with Salesforce, to construct a constituent inquiry database and will be compatible with the database in the Governor’s Office.
  - Initiative will assist DVI and DOE in development of a department wide constituent inquiry database and improve communication between the 2 agencies.
  - Database will allow for accurate monitoring of each request from inception through completion, users will have the ability to follow each step of the request.
  - Database will be searchable by constituent, division, and request theme.
- DVI and DOE continue to revise their Memorandum of Understanding (“MOU”), although progress has slowed due to the additional support needed for DVI and Local Education Agencies (LEAs) in a pandemic environment.
  - MOU updates include clear communication guidelines for DVI, LEAs, and DOE.
  - Procedures related to services for students who are visually impaired, or blind will be outlined, including clearly defined roles and responsibilities of DVI and LEA staff, and aligning the MOU with DVI’s updated policies and procedures.
- DVI is working with the Workforce Innovation Technical Assistance Center (“WINTAC”) to meet the federal requirements related to transition and preemployment transition services and the partnership between education and Vocational Rehabilitation (“VR”).
  - DVI is ensuring MOU continues to establish clear guidelines for communication and processes related to transition and how DVI’s Education Program, LEAs, DVI’s VR Program, students, and families work together to ensure seamless transition services are provided.
  - DVI developed a Pre-Employment Transition Services policy with the guidance of WINTAC.
    - Circulated for public comment and was a topic of discussion at a DVI/Vocational Rehabilitation Advisory Council Town Hall meeting.
    - DVI will ensure this policy is reflected in the transition sections of the MOU.
- DVI reviewed education policies and posted current policies on their website.
  - Policies and procedures must comply with state and federal regulations.

- DVI started an organizational development initiative to evaluate agency structure, identify needs, and develop comprehensive training and communication plans. The following is an initial outline to address communication needs.
  - Develop a Communication Plan (Long-term around priority projects)
  - Communicate with constituents – Internal and External
  - Communicate with staff at all locations – especially while we work remotely
  - Build trust through improved communications
  - Generate regular communications (email, newsletter, social media, phone, etc.)
  - Training to Address:
    - Expectations
      - Accountability – performance Evaluation
    - Communication tools
      - Assessments/Training/Self-Directed Readings/Activities (Staff)
      - Guidelines for services

**Ongoing Plan:** The DVI Director, DOE liaison, and DOE transition liaison will continue to meet and identify areas in the MOU that need revisions. Next steps will be to involve other DVI and LEA staff as well as stakeholders to ensure revisions are accurate and align with actual practices. DVI will also ensure education services and their partners are considered in the communication plan developed through this organizational development initiative.

### **Accessibility of DVI Offices (Recommendation 10)**

- DVI currently has 4 office locations and 2 Technology Training Centers in New Castle & Georgetown.
- In June 2019, the former DVI Director moved the DVI office and Training Center from the Milford Annex to 3 Kent and Sussex office locations. Since the move, DVI advocates have described the accessibility issues at all locations.
  - Priority Level 1 – Stockley Campus, Georgetown
    - This office is home to the DVI downstate Technology Center and the one most in need of solutions.
    - The campus is accessible by paratransit (door to door) but it is not on a fixed bus route.
    - This location is nestled in the back of campus which is accessed via a farm style uneven road with no sidewalks. If the fixed routes changed to add this as a stop, the walk from the campus entrance to the DVI building would still be dangerous for a blind person.
    - **Solution (in progress):** DVI to develop a partnership with the Georgetown Library to conduct remote technology training and store equipment. If successful, DVI intends to look for additional remote locations in Kent and Sussex Counties to expand services.
    - **Partnership with Georgetown Library Update:**
      - DVI and the Georgetown Public Library signed a partnership agreement, with an effective date of November 1, 2020 to formalize the project.<sup>11</sup>

<sup>11</sup> Appendix G: DVI Recommendation 10 Documents.

- Library has several private classrooms on the first floor and a reference desk with a computer on the second floor.
  - The second floor is a barely used, quiet, massive space with an elevator.
  - DVI will use part of the desk for a large magnifier, install screen readers on the desk computer, and can use the large television for Zoom Text, if needed.
  - Locked cabinets to hold small portable devices.
- The location is one block from the fixed bus route and building is fully accessible.
- In return for providing a free space, DVI will teach library staff on use of screen reading software, as well as the desktop magnifier, so patrons with visual impairments have access to the tools and library staff have the ability to assist them.
- In addition, DVI will have the Independent Living Team add Braille markers to the elevator, bookshelf ends, front desk, and other common areas.
- DVI will incorporate community resources into remote training to encourage increased community integration. The library will display DVI brochures and both entities agreed to promote partnership on websites and social media.
- DVI is fortunate to have this amazing partner to provide a perfect space at no cost.
  - DVI hopes to replicate this success in other locations and find similar partners.
- Priority Level 2 - Hospital for the Chronically Ill, Smyrna
  - The hospital is accessible by paratransit and fixed route; however, the bus stops on Rt. 13 outside the hospital.
  - The challenge is walking from the bus stop to the hospital. Once off the bus, visitors must traverse along the shoulder of Rt. 13, and turn onto a two-lane road with no shoulder or sidewalk. The entire walk is approximately a quarter mile but very dangerous for a person who is blind.
  - **Solution:** None to date; however, DVI only has 2 staff members at this location. Both deliver remote services in the community. This location does not have a Training Center so there is limited chance that consumers would need to meet at this location.
- Priority Level 3 - Milford State Service Center, Milford
  - Milford is accessible by Paratransit and fixed route. The bus stop is not far from the office and there are some minimal hazards if walking.
  - **Solution:** None to date; however, there is no Technology Training Center at this location. The 7 DVI staff members located at this office deliver remote services in the community. There is limited chance that consumers would need to meet at this location.
- Completed - Herman Holloway Campus, New Castle
  - Lack of consistent sidewalks & dangerous curb cuts lead to the DVI office and Technology Training Center.

- **Solution (completed):** DHSS completed all repairs and upgrades in the summer of 2020.
- DVI proposed a contractual agreement with a very active DVI advocate who has a tremendous amount of knowledge with accessibility to take the lead in helping DVI create a comprehensive accessibility plan.

**Ongoing Plan:** The Training Center staff will receive training on how the remote program is designed, understand the expectations, and gain an understanding of how to effectively provide community-based services. DVI will inform consumers of community-based training and will encourage the use of community sites. DVI intends to research additional cost-neutral locations including WIOA partners in hopes of developing additional remote training locations. DVI is committed to performing an accessibility review to learn in detail the accessibility issues faced by people with blindness regularly. If the DVI advocate mentioned is not interested, DVI hopes to engage our councils to assist with this project.

### **Boards, Committees, or Councils related to DVI (Recommendation 11)**

- In addition to the councils listed<sup>12</sup> DVI holds membership on other councils and committees including the Statewide Independent Living Council, the State Council on Persons with Disabilities, the Employment First Oversight Commission, and the Human Subjects Review Board.
  - DVI can provide a comprehensive list of these memberships upon request.
- Despite membership on many councils and committees, DVI is not a member of the Governor's Advisory Council for Exceptional Citizens.
  - Membership on this council would be advantageous to both DVI, the council itself, and the many consumers it represents.
  - DVI is continuing to pursue membership on this council.
- DVI continues to work closely with advisory councils to provide information, receive feedback, and identify areas of interest for the council and DVI to focus efforts.
- Although a formal review of each has not been completed, the Vocational Rehabilitation Advisory Council/State Rehabilitation Council ("VRAC/SRC") was included as part of federal monitoring by the Rehabilitation Services Administration ("RSA").
  - The 3 primary areas of focus for RSA monitoring were data, fiscal, and state plan.
  - To address a contingency placed on the Delaware WIOA Combined State Plan, DVI was required to submit a detailed plan and timeline for ensuring the state plan goals and priorities are jointly developed with the VRAC/SRC and DVI.
    - Submission and approval of the DVI plan to jointly develop goals and priorities with the VRAC/SRC, the contingency was removed from the DE Combined State Plan and RSA approved the plan in September 2020.
  - The following steps have RSA approval:<sup>13</sup>
    - A. Constitute a State Rehabilitation Council ("SRC") in compliance with regulations at 34 C.F.R. § 361.17.
    - B. Conduct the Comprehensive Statewide Needs Assessment ("CSNA") with the SRC as described in 34 C.F.R. § 361.
    - C. Review findings derived from the CSNA with the SRC by September 15, 2021.

<sup>12</sup> Appendix E: 2020 JLOSC Recommendations Progress Report DVI (board tables on page 19).

<sup>13</sup> Appendix H: RSA Approved DE DVI SRC State Plan Contingency 09/22/2020.

- D. Conduct sessions with the SRC to jointly develop goals and priorities by December 1, 2021.
- E. Submit modified description I of the DVI VR portion of the Delaware WIOA State Plan March 1, 2022.
- After preliminary results of RSA monitoring, DVI immediately started working on compliance with VRAC/SRC with assistance provided by the Governor's Office of Boards and Commissions and a DHSS appointed Deputy Attorney General ("DAG").
  - Governor's Office of Boards and Commissions has been working on filling council vacancies.
    - Researched member terms to identify members who were out of compliance.
      - One member found serving an ineligible term based on federal regulations and council by-laws.
        - Governor's Office requested the member to resign and member has refused.
        - DVI is providing updates to RSA regarding the situation, this is an anticipated finding in DVI's RSA monitoring report.
    - DAG has been attending VRAC/SRC meetings regularly for the past several months and providing support.
- VRAC/SRC issues identified through the State Plan and RSA monitoring have been ongoing for several months and are extremely time consuming.
  - This council received the most of attention with regard to this recommendation.
  - DVI's relationship with the other councils are collaborative.
    - Conversations in recent meetings have been informative and we are receiving positive feedback from members.
  - To perform a more comprehensive and unbiased evaluation of the councils, DVI did explore working with consultants.
    - Agency lacks funding needed to support the additional work of these consultants.
    - DVI continues to explore options through existing state contracts but have not found qualified vendors to do this type of work yet.

**Ongoing Plan:** DVI will continue to work on the plan approved by RSA in order to jointly develop goals and priorities with the VRAC/SRC and work with RSA to receive technical assistance if delays or challenges are encountered. DVI would like to collaborate with their associated councils to develop and offer training on public meetings and new member orientation in order for members to be more informed about the purpose of the council and their roles and responsibilities as members. DVI hopes this will also result in easing recruitment for hard to fill positions and increasing participation.

## **Follow Up Reporting (Recommendation 12)**

- DVI submitted the second progress update on December 1, 2020.

# LEGISLATION

The following recommendations were adopted and require legislation. JLOSC and DVI staff will collaborate during the drafting process.

## **Recommendation 2: General Statutory Updates & Technical Corrections**

JLOSC will sponsor a bill to make technical corrections to DVI's entire governing statute, including Chapter 79, Title 29; Chapter 21, Title 31.<sup>14</sup>

## **Recommendation 3: Additional Statutory Updates**

The review process has highlighted several areas of the Delaware Code relating to DVI that will require amendments beyond technical corrections. It was also identified that many of these sections have not been amended in at least 9 years, for some sections it has been much longer.

DVI shall work with JLOSC staff in developing legislation to address the areas of concern identified during the JLOSC review of DVI. These areas include, DVI's governing statute, Chapter 79, Title 29; Chapters 21 and 23, Title 31; braille literacy rights and education in Chapter 2, Title 14, State appropriations in Chapter 17, Title 14, and BEP provisions under the State pension plan in Chapter 55, Title 29 and Statewide contracts under Chapter 96, Title 16.

**UPDATE:** The DVI updates regarding the status of federal RSA monitoring in relation to the Vocational Rehabilitation Advisory Council/State Rehabilitation Council ("VRAC/SRC") presents an additional area of concern that may require statutory assistance. The VRAC/SRC is not currently codified and is a federal requirement. JLOSC staff will be working with the Governor's Office of Boards and Commissions and DVI on potential legislation for JLOSC consideration.

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<sup>14</sup> The Committee's legislative attorney will draft any legislation resulting from approved recommendations, unless otherwise noted.

# RECOMMENDATIONS

The following is an easy reference list of all recommendations adopted by the Committee for DVI.

## **Recommendation 1: Continue or Terminate**

Under §10213(a), Title 29, the Committee determined there is a genuine public need for an agency under review. DVI shall continue, subject to any further recommendations that JLOSC adopts.

## **Recommendation 2: General Statutory Updates & Technical Corrections**

JLOSC will sponsor a bill to make technical corrections to DVI's entire governing statute, including Chapter 79, Title 29; Chapter 21, Title 31.<sup>15</sup>

## **Recommendation 3: Additional Statutory Updates**

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## **Recommendation 4: Analysis of Agency Structure – Staff and Funding**

DVI shall review and identify necessary changes across all program units dealing with staff levels and positions focusing on funding structures and development opportunities. DVI may consider consulting with other State agencies such as the Department of Human Resources for assistance.

## **Recommendation 5: Agency Staff – Training**

DVI shall review and identify current training needs of its staff and implement appropriate training. DVI may consider participating in Mandt System® training for employees working outside of the office. DVI may also consider conducting a survey of their employees to solicit feedback and consulting with the State Department of Human Resources for assistance in scheduling and availability of training courses available in the Delaware Learning Center.

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<sup>15</sup> The Committee's legislative attorney will draft any legislation resulting from approved recommendations, unless otherwise noted.

### **Recommendation 6: Agency Staff – Policy and Procedure Manual**

DVI shall create and implement an internal manual with policies and procedures that will enhance staff communications, recruitment, onboarding, and retention procedures.

### **Recommendation 7: Create Agency Program Specific Policy and Procedure Manuals**

DVI shall create and implement a policy and procedure manual for each of its 5 service units: Education, Vocational Rehabilitation (VR), Independent Living Services (ILS), Orientation & Mobility (O&M), Assistive Technology (AT). Any associated supporting units such as the instructional materials unit and Business Enterprise Program (BEP) shall also be included.

Additionally, DVI provides administrative support for several advisory boards identified in the JLOSC Final Report published in June 2019. In order to ensure clear communication, DVI will create a policy regarding the agency's coordination and administrative support provided to these groups.

Program policies will enhance service unit functionality and transparency. All policies shall be created by DVI using national standards and best practices, approved by the agency director, and posted on the agency's website. The following is not an exhaustive list but is an example of areas to address:

- Staff Standards, Qualifications, and Requirements
- Staff Training and Recruitment
- Staff Expectations
- Client Expectations (includes failure to cooperate)
- Requests for Services
- Authorization of Services
- Plan Development
- Service Standards
- Service Time Frames
- Qualifications and Requirements for Performing Assessments
- Case Management (opening, closing, re-opening, inactive)
- Closing and reopening cases due to "Failure to Cooperate"
- Coordination of Services
- Storage of Client Records
- Client's Rights to Records
- Informal/Formal Review Process and Mediation
- Client Transportation
- Communication of Policies
- Exceptions to Policies
- Technology Management
- Fiscal Management (could include payment for services and fee schedule)
- Staff Acting as a Family Member's Advocate (handling conflicts of interest)
- Coordination with the State's Department of Education (includes school districts)
- Coordination with Advisory Councils and Boards
- Coordination with Agencies and Non-Profits
- Coordination with Client's Family Members or Advocates
- Interns



**Recommendation 8: Education Services – Funding**

DVI shall continue working with national experts and the Delaware Department of Education in determining a suitable funding source for DVI services provided to students with blindness or visual impairment.

**Recommendation 9: Education Services – Communication**

DVI shall continue working with the Delaware Department of Education (DOE) in efforts to improve communications which include creating or updating policies as follows:

- a. Develop and implement communication and procedure guidelines regarding DVI services for students in local school districts.
- b. Review its current Memorandum of Understanding (MOU) with DOE and work to bring meaningful modifications to the agreement.
- c. Develop a policy for education services from DVI to DOE.
- d. Develop a clear policy outlining the Individualized Education Program (IEP) process and protocol for blind and visually impaired students. This policy should include procedures and timeframes required for DOE and its districts to notify DVI of students with blindness or visual impairments.

**Recommendation 10: Accessibility of DVI Offices**

DVI shall continue working with DelDOT, DART, and various agencies in addressing and implementing accessibility measures to their new office locations. DVI shall submit updates on each site's progress to JLOSC.

**Recommendation 11: Boards, Committees, or Councils related to DVI**

DVI shall review and report to JLOSC regarding the number of advisory boards and groups that relate to their agency's mission. The JLOSC Final Report published in June 2019 lists 6 groups and outlines their composition and staffing. There are additional boards and councils that serve areas of interest and DVI could benefit from forming stronger communication channels. In some cases, DVI is not included in the board structure and would benefit from inclusion. The report shall include information such as board title, mission statement or purpose, statutory authority, and frequency of meetings. Additionally, the report should include a summary of DVI's current level of involvement with each board identified and any areas of improvement they have identified.

**Recommendation 12: Follow Up Reporting**

DVI shall submit progress reporting to JLOSC staff regarding the progress and implementation of Recommendations 3 through 11 on the following schedule:

- Progress Report #1 – July 31, 2020
- Progress Report #2 – December 1, 2020

**Recommendation 13: Release from Review or Hold Over**

DVI is held over and shall report to the Committee in January 2021.

# ANALYST RECOMMENDATION

Despite a nationwide pandemic which presented new challenges, DVI has made admirable and positive progress on all the Committee's recommendations regarding staffing, policy, funding, communication, and education services.

DVI has demonstrated responsiveness to the Committee's recommendations and provided their ongoing plans and implementation goals in the final December reporting update. DVI voluntarily provided this additional information without prompting by JLOSC staff. It is the analyst's belief that this is a demonstration of good faith efforts that DVI's work will continue well past the conclusion of the JLOSC review process.

Additionally, DVI leadership confirmed during communications with the Committee's analyst that leadership remains dedicated to their ongoing plans and initiatives to continue agency improvement. DVI leadership found the JLOSC review process to be rewarding and expressed gratitude to the Committee and its staff for assisting them through this review process and providing the needed support to bring meaningful change to the agency.

The remaining review work requires legislation which will be drafted jointly between JLOSC and DVI staff. The review work completed under this sunset and oversight review will provide guidance for the drafting process and can continue without further progress monitoring.

## **ANALYST RECOMMENDATION:**

DVI is released from review upon enactment of legislation making technical corrections under Recommendation 2.

# **DVI HOLDOVER 2021 APPENDICES**

# FACT SHEET

January 15, 2020 JLOSC Task Force on DVI



Joint Legislative Oversight  
& Sunset Committee

## The Task Force held 6 meetings and collected data on 28 tabled Recommendations.

- Developed and distributed worksheets to collect feedback.
- 72 responses received in total.
- Feedback most valuable when accompanied by comments explaining the respondent's pros or cons of a recommendation.
- 4 meetings held to discuss the meeting worksheets.
- Additional data collected from meeting conversations and through research conducted by the JLOSC Analyst.

## Additional Information about DVI

- 5 program units, serve low-incidence disabilities, would benefit from meaningful recommendations from the JLOSC review process.
- Delaware's DVI programs have been consulting with leading experts for several years.
- Customer Satisfaction Surveys began in September of 2018.
  - Overall customer satisfaction rate of 82.84%.
- New Office Locations: Expanded from 2 to 4 sites in 2019.
- Leadership Change 11/18/2019: Sandra Miller became the acting director for DVI, previously served as the agency's deputy director.

## Additional JLOSC Analyst Research

- Blindness and visual impairments are considered specialized low-incidence disabilities.
  - Require specialized resources.
  - Have higher associated costs.
    - Assistive technology devices range from \$1000 to \$6000 per device.
    - Average cost for converting a textbook into braille can cost over \$15,000.

## → Due to complexity, careful consideration of research and best practices is necessary in all decision-making processes regarding DVI.

- Delaware's DVI program is unique; no other state program for the blind and visually impaired operates in the exact same manner.

- Most states have active non-profit support for the blind and visually impaired community.
  - Many states rely on robust non-profit resources to meet needs for blind and visually impaired services.
- 38 states have a dedicated school for the blind and visually impaired.
- Most states' programs are arranged into their labor departments.
  - Provide only vocational rehabilitation services and independent living services for older adults.
  - Delaware DVI program has 5 service units:
    - Education
    - Vocational Rehabilitation
    - Independent Living Services
    - Orientation & Mobility
    - Assistive Technology



# Equitable Infrastructure Committee

*Proposed Plan for Statewide Services and Support (Autism Spectrum Disorder, Deaf, Hard of Hearing, Deaf-Blind, Visually Impaired)*

# Goal

In aligning with DDOE's mission, we want to create equitable services across the state.

*DDOE Mission: To empower every learner with the highest quality education through shared leadership, innovative practices and exemplary services.*

# Agenda

**Background-** Task Forces & SESPAC committees

**Situation** - state agencies functioning separately; unaligned in levels of support; proposed changes to who Statewide programs answer to

**Proposed Solution** - create an inclusive, Statewide system of support - Delaware Special Education Service Agency (*see next slides*)

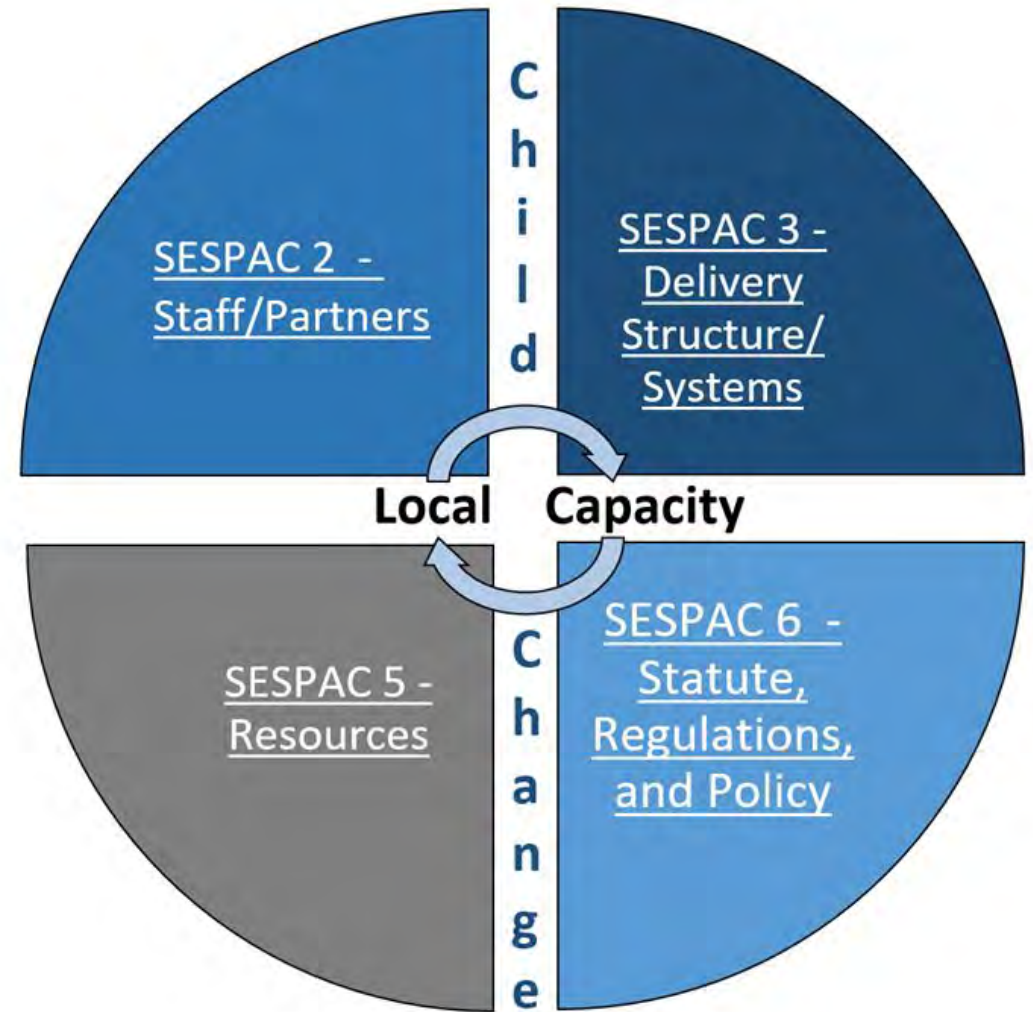
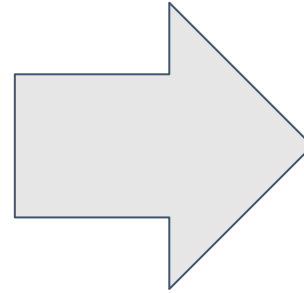
**Benefits** - equitable funding and service; shared resources and technical support; build capacity in school districts; blueprint for other service programs

**Steps Involved** - Phase 1: develop shared vision among stakeholders & Phase 2: action plan for implementation

# Background

## Task Force Efforts

- Vision
- Deaf/Hard of Hearing
- ASD
- DVI





# Background

## SESPAC 2 - Staff/Partners

2.3.8 Create/Augment leadership training and coaching—provide support from experienced leadership, train/mentor to new administrators, provide training on new and evidenced-based leadership strategies, and create programs to support staff to move into administration.

2.5.5 Encourage growth by creating and using an evaluation system that supports growth and development where the evaluation focus matches the jobs content/focus/structure.

## SESPAC 3 - Delivery (Structure/Systems)

3.1 Implement a statewide network of specialists to support students with more intensive and complex needs by providing professional development, direct service, and oversight of fidelity of implementation.

3.2 Develop of administrative support/guidance for appraisal of LEA-based specialists; network staff provide consultation to LEA/school staff on appraisal; identify array of evidence-based service delivery models to support students in inclusive settings.

3.1.7 Create a staff network to include resource reallocation of existing statewide positions (through code changes) and addition of resources for specialist positions; restructure statewide programs under LEA or state agency (Deaf/HOH/DB, Blind/VI, Autism/ID) and recruitment of administration, specialists, etc.

## SESPAC 5 - Resources

5.1.2 Develop a statewide database of student-specific resources, trainings, and professional development materials for educators that is maintained with annual updates.

5.2.2 Create a plan to encourage resource sharing and eliminate or diminish the barriers for sharing resources, including staff, across LEAs.

5.2.3 Create a system in which equipment (assistive technology) and other individually prescribed materials can follow the student across LEAs. (See Ed Technology Task Force).

## SESPAC 6 - Stature, Regulations, and Policy

6.2.3 Remove barriers for resource sharing including the creation of and access to a lending library for equipment (or improve DATI lending library) and amend regulations to permit student-specific resources to follow the student.

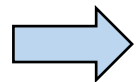
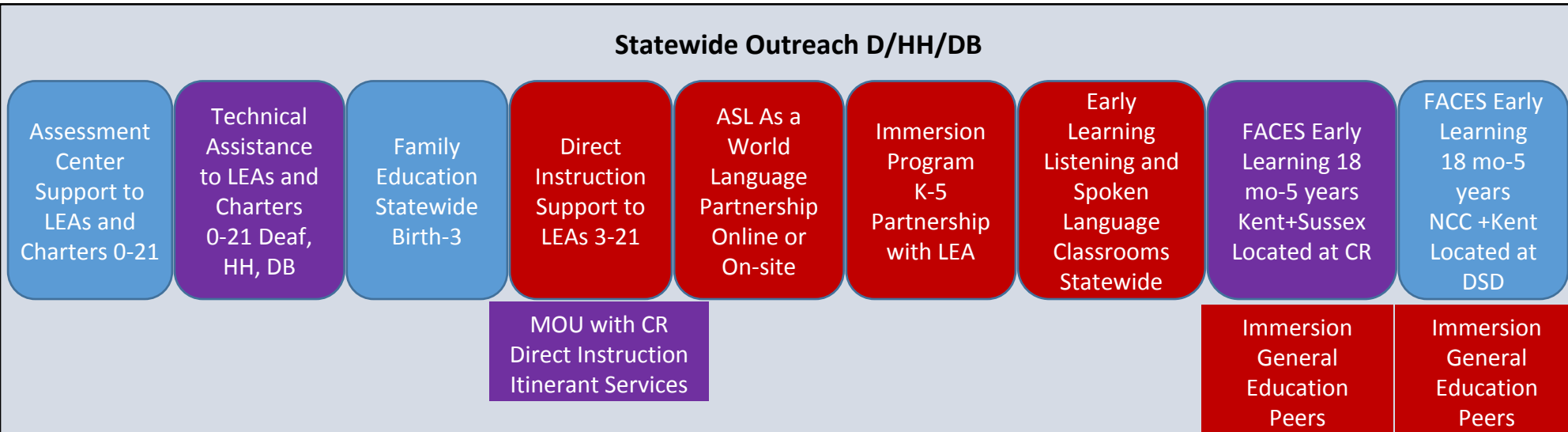
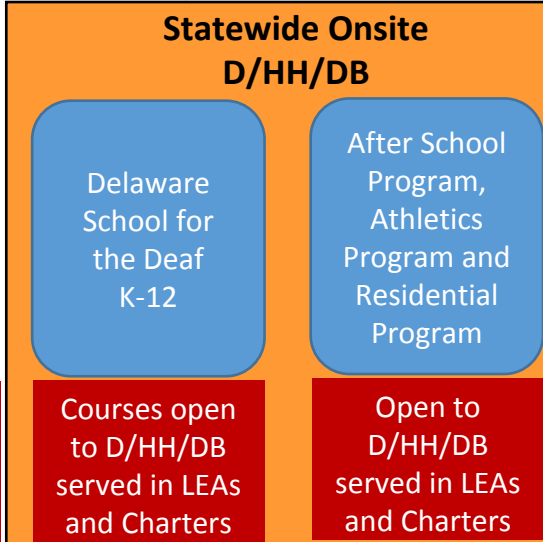
# Situation

- Individual student needs have increased in complexity and cross disciplines
- Statewide programs are still functioning separately
- Levels of support are unaligned
- Unclear where Statewide programs will be housed (changes being proposed)
- Current funding systems do not account for growth and changes in complexity of student needs, increased technical assistance, and training
- Continuum of services not currently met in individual student's zoned school district
- Concerns about equity and consistency of services throughout the state

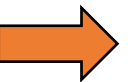
# Situation

## Delaware Statewide Programs for the Deaf, Hard of Hearing and Deaf-Blind Director: Laurie Kettle-Rivera

School Leader: Daphne Werner  
School Leader: Courtney Cooper  
Residential Program Admin: Eva Hartmann



Continuum of services for districts from Statewide Programs, less involved (left) to more involved (right)



- **Blue - Established Programs**
- **Purple - Newly Established 2019-2020 and 2020-21**
- **Red - Proposed Program Features**

# Situation

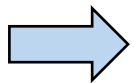
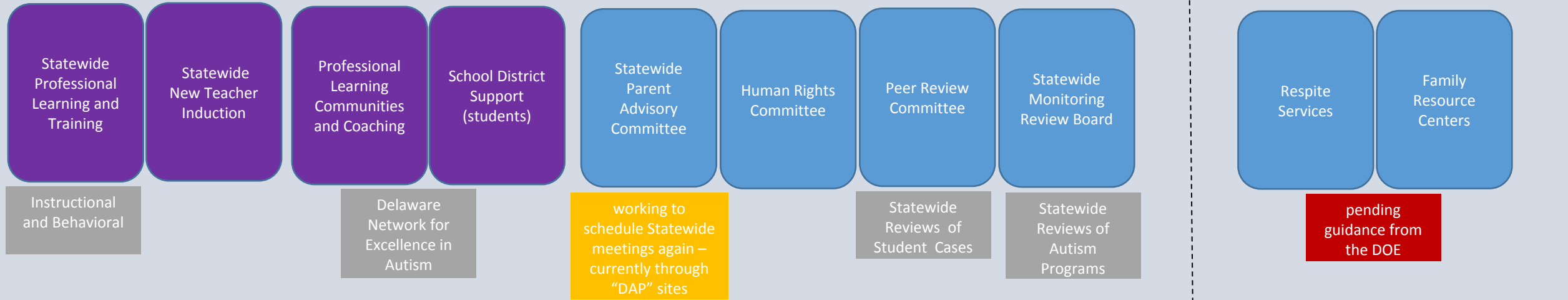
## Delaware Office of Statewide Autism Programs Director: Mary Whitfield, Ed.D., BCBA

Statewide Professional Development Specialist: TBD  
 Statewide Professional Development Specialist: TBD  
 Statewide Professional Development Specialist: TBD  
 Statewide Professional Development Specialist: TBD

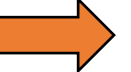
Administrative Assistant: TBD

Respite/Residential Program Coordinator  
 Respite/Residential Program Coordinator

### Statewide Outreach Autism



Continuum of services for districts from Statewide Programs, less involved (left) to more involved (right)



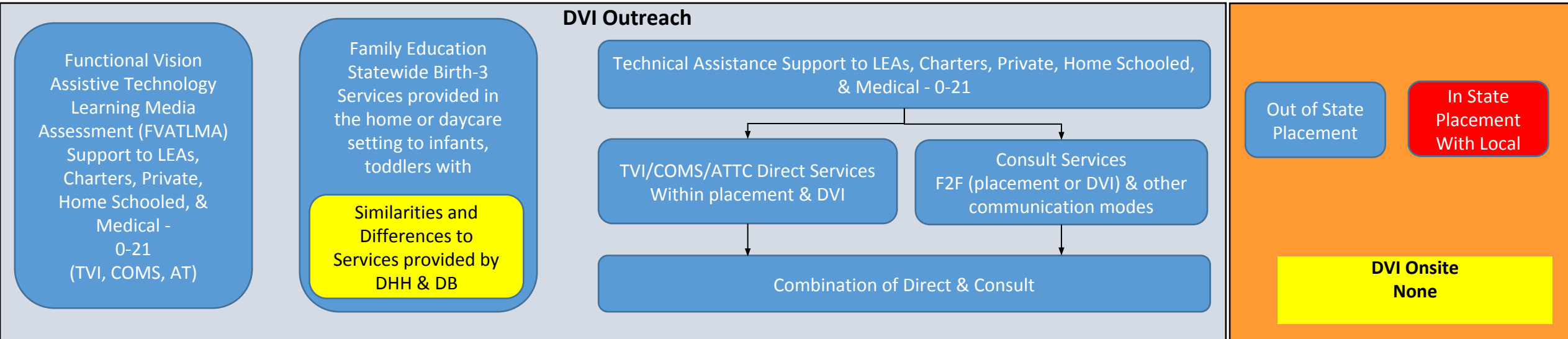
- **Blue - Established Programs**
- **Purple - Newly Established 2019-2020 and 2020-21**
- **Red - Proposed Program Features**

# Situation

## Division for the Visually Impaired Director: Sandra Miller

DVI Director: Sandra Miller  
DVI Deputy Director: Debbie Talley-Beane

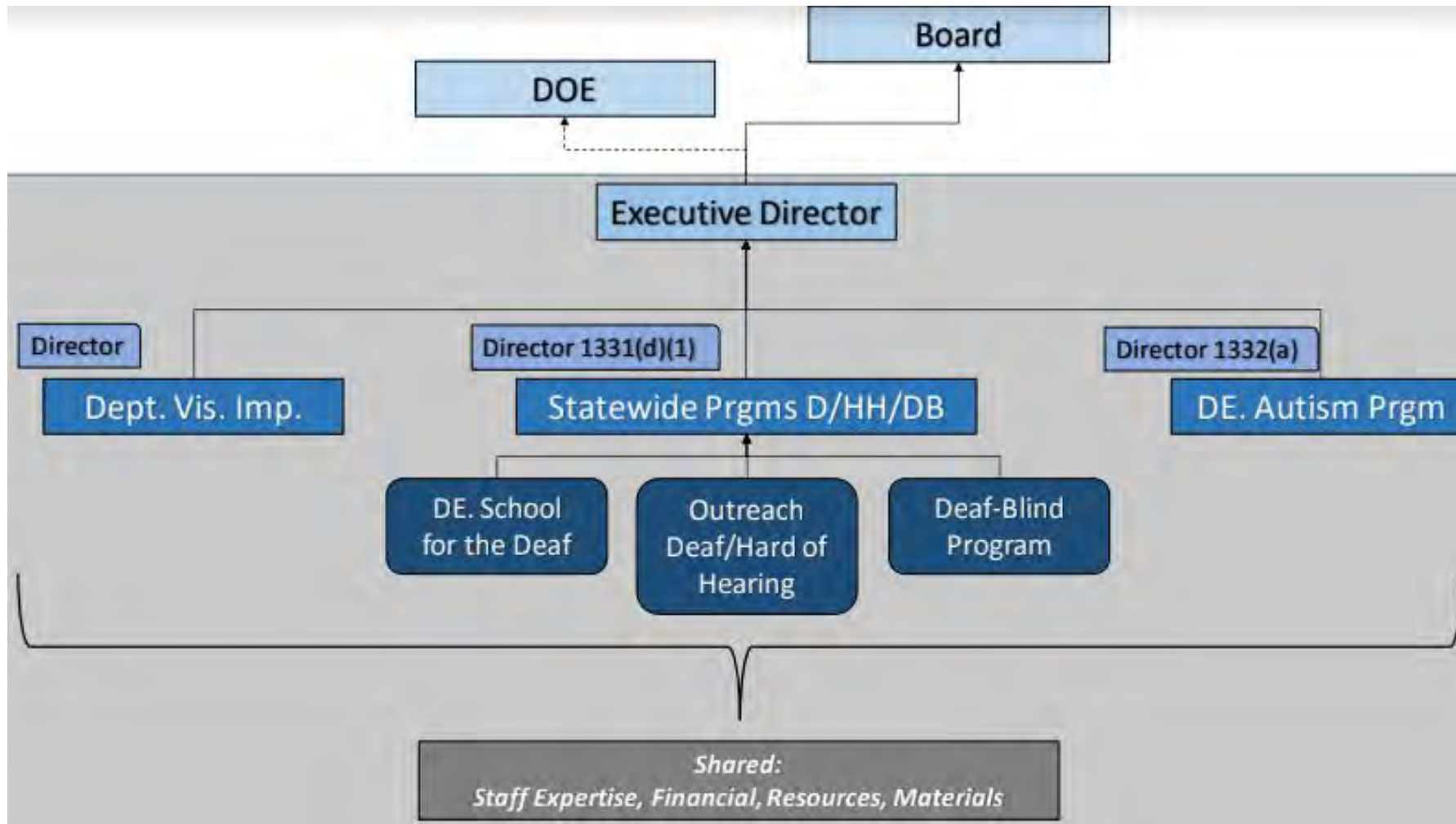
Statewide Coordinator: Erin Weaver  
Statewide Coordinator Admins: Rachel Hollen & Mari Norris



➡ Continuum of services for districts from Statewide, Less involved (left) to more involved (right) ➡

- **Blue - Established Programs**
- **Purple - Newly Established 2019-2020 and 2020-21**
- **Red - Proposed Program Features**

# Proposed Solution

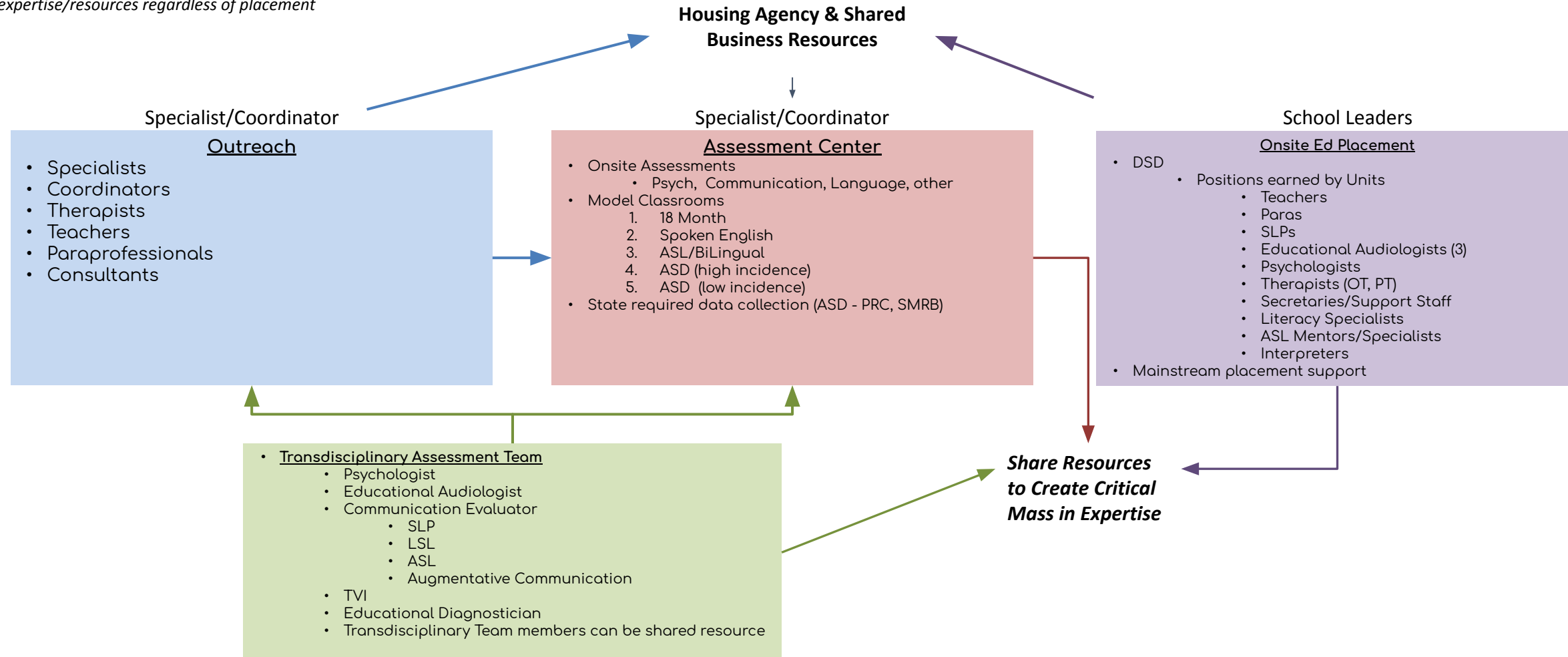


# Proposed Solution

## Delaware Special Educational Service Agency (DSESA)- *name TBD*

### Outcome:

*Student growth through the development of local capacity by means of creating critical mass of expertise/resources regardless of placement*



# Benefits

- Equitable funding
  - districts pay for specific services they need; differentiated tuition
- Equitable service
  - services available for LEAs currently without specialty areas
  - support consistency & quality of services state-wide
- Supports inclusive practices
  - students able to receive services in home district
- Resources shared across LEAs
  - shared specialists cross-LEA (e.g., TOD, AT specialists, low incidence programs)
  - efficient use of capital, human, and monetary resources
- Expanded expertise in technical support
  - decreased use of out-of-state consultants and private contractors
  - in-state specialists provide support to enhance consistency & quality of services
  - build capacity within LEAs
- Serves as a blueprint for other programs of service
  - Model could be utilized for other high needs areas (e.g., mental health)



# Steps Involved

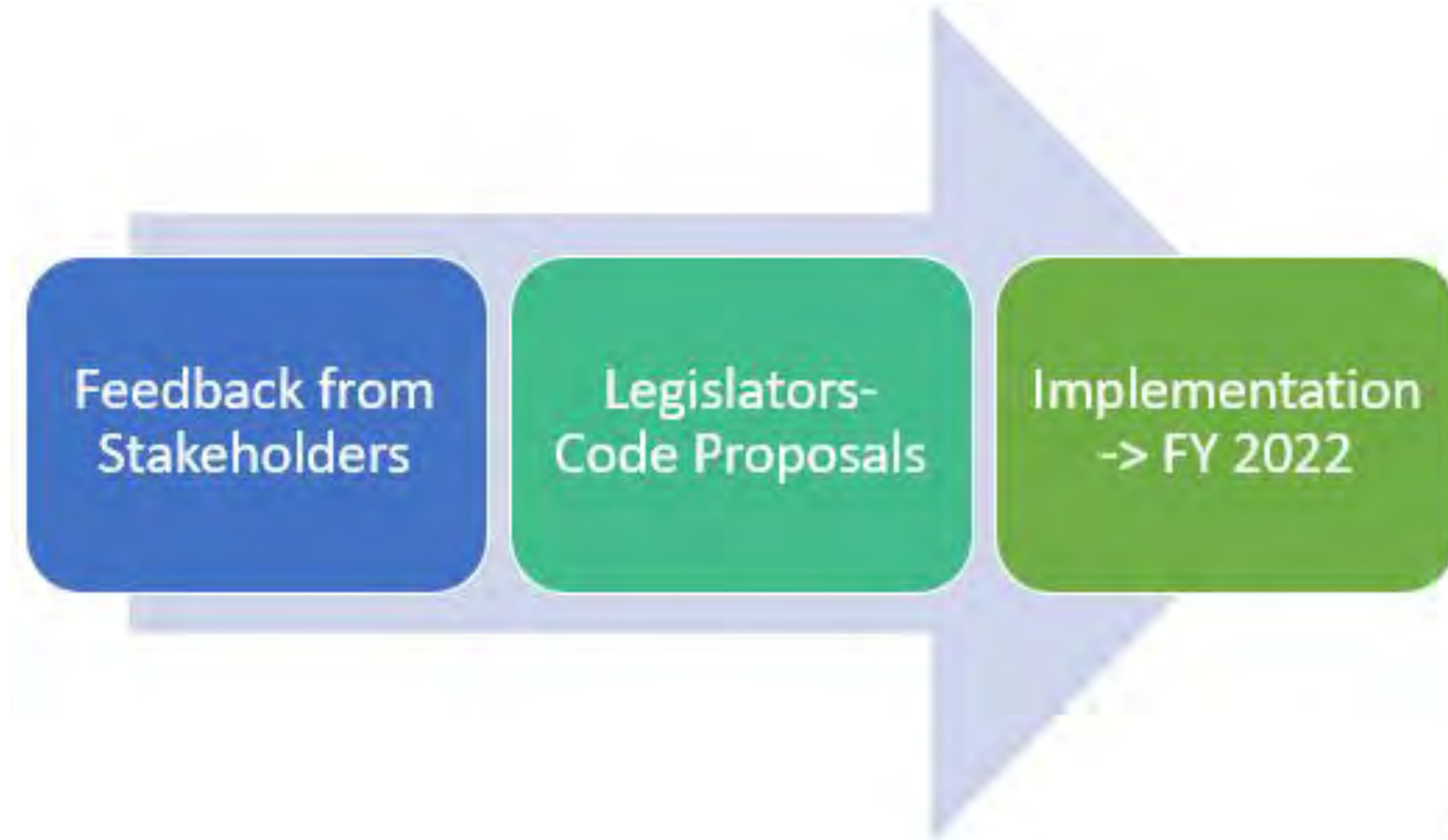
## **Phase 1: Develop Shared Vision**

- Collaborate with DOE and with related state agencies
  - ◆ continual feedback on assessment and development in supporting State's needs
- Present to SESPAC, DASEP, & GACEC
  - ◆ *other stakeholder groups*

## **Phase 2: Action Plan** (*ongoing feedback from DOE*)

- Develop Action Plan for Implementation
  - ◆ e.g., Code changes
    - e.g., housing agent, staffing, funding/salaries
- Meet with legislators
  - ◆ Collaborate with DOE & SESPAC Policy Committee on code changes and legislative initiative

# Timeline



# Comments

- Please share warm/cool feedback.
- Who else should we invite to review the proposal?
- How do you see this proposal, once implemented, helping your district/school/student/child?
- Are there other areas of support related to D/HH/DB/VI/ASD that are not currently included in this presentation?
- Please share ideas for names.

*Thank you for sharing your  
time and commitment  
to our students!*

# Additional Disability Information

Table 1: Highlights of Educational Service Agencies in Five States

<i>State</i>	<i>Educational Service Agency</i>	<i>Primary Funding Source</i>	<i>Offers Services in Addition to Special Education Services</i>	<i>Can be a Direct Provider of Special Education Services</i>
Connecticut	Regional Education Service Centers (RESCs)	Member school districts and state	Yes	Yes
California	Special Education Local Plan Areas (SELPAs)*	State	No	Yes
Indiana	Special Education Cooperatives	Member school districts and charter schools	No	Yes
New York	Board of Cooperative Education Services (BOCES)	Member school districts and state	Yes	Yes
Rhode Island	Collaboratives	Member school districts and state	Yes	Yes

The Connecticut, New York, and Rhode Island models are largely similar. ESAs in all three states provide regional professional development, training, and various forms of technical assistance. RESCs and BOCES each provide transportation services, and Rhode Island collaboratives generally do not.

New York's BOCES are different in at least two significant ways: (1) they usually cover a geographically larger area than most Connecticut RESCs in part due to New York's larger size (for example, the Nassau County BOCES has 56 member school districts) and (2) they oversee and administer the technical high schools in their regions. (In Connecticut, technical high schools are run by the state.)

**Table 2: Services Offered by Louisiana's Special Schools**

<i>Special School</i>	<i>Services Provided</i>
Louisiana School for the Deaf	<ul style="list-style-type: none"><li>● Comprehensive Pre-K through 12 education for deaf and hard-of-hearing students age three to 21 who reside in Louisiana</li><li>● Instruction in a bilingual environment of American Sign Language and English</li></ul>
Louisiana School for the Visually Impaired	<ul style="list-style-type: none"><li>● Educational programs for Louisiana students who are blind or visually impaired</li></ul>
Louisiana Special Education Center	<ul style="list-style-type: none"><li>● Services for orthopedic-impaired students age three to 32</li><li>● Vocational training and transitional services for students age 14 to 32</li></ul>

***Funding.*** For students enrolled in special schools within the Special School District, state law requires the state to fund the cost of special education and related services (La. Rev. Stat. Ann. § 17:1947). The Special School District has no authority to levy taxes (La. Rev. Stat. Ann. § 17:1945).

**Table 3: Services Provided by Nebraska ATP Education Technology Specialists**

<i>Service Category</i>	<i>Description</i>
Professional development and training	ATP hosts events for large and small groups of parents, educators, and professionals that are designed to increase knowledge and skills.
Consultations	Technology specialists respond to school requests to help identify student-specific, appropriate assistive technology for special education students.
Equipment demonstrations	Technology specialists offer equipment samplings that compare the features and benefits of particular devices or categories of devices for one student or small group.
Equipment loans	ATP lends equipment to schools at no cost to (1) help in the technology decision-making process or (2) fill a gap while waiting for equipment funding or repair.
Awareness events	ATP offers presentations and exhibits at conferences to reach a large audience.

**Funding.** Nebraska VR applied for a federal grant to establish ATP in 1989, becoming one of nine states to receive funding under the Technology-Related Assistance Act of 1988 (PL 100-407). This law provides funding to develop permanent statewide programs designed to meet the assistive technology needs of individuals with disabilities of all ages.

ATP's technology specialists assist special education students using federal IDEA funding. ATP has a memorandum of understanding with the Nebraska DOE that enables it to receive IDEA grants. Grant money funds services that technology specialists provide to schools in their assigned state areas.



# D/HH Statistics

Defining the population ... Low Incidence High Needs does not fit neatly into one category.  
The challenge is who is trained enough to provide services across populations?

*Deaf with other 39.9% (Gallaudet Research Institute, April 2011)*

Classifications the can deter services in red	%	Levels of hearing loss not qualifying for services	%
Low vision	3.8	Normal (< 27 dB, ANSI)	19.8
Legal blindness	1.7	Mild (27-40 dB, ANSI)	13.6
Developmental delay	5.3	Moderate (41-55 dB, ANSI)	14.5
Learning disability	8	Mod-severe (56-70 dB, ANSI)	12.4
Orthopedic impairment	4.4	Severe (71-90 dB, ANSI)	13.4
ADD/ADHD	5.4	Profound (91 dB &above, ANSI)	26.4
Mental retardation	8.3	<div>"ANSI" Auditory Neuropathy Spectrum Impairments</div>	
Emotional disturbance	1.8		
Autism	1.7		
Usher syndrome	0.2		
Other health impairment(s)	5.8		
Other conditions	8.5		

Regional and National Summary Report of Data from the 2009-10 Annual Survey of Deaf and Hard of Hearing Children and Youth.

# DB Statistics

Defining the population ... Low Incidence High Needs does not fit neatly into one category.  
The challenge is who is trained enough to provide services across populations?

*Deafblindness with other... (National Center on Deaf-Blindness, 2017)*

	%
Orthopedic Physical Impairments	59
Cognitive Impairments	66
Behavioral Disorders	11
Complex Health Care Needs	51
Speech Lang Impairments	74
Other	21

**2005, 13.1% had four or more additional disabilities**

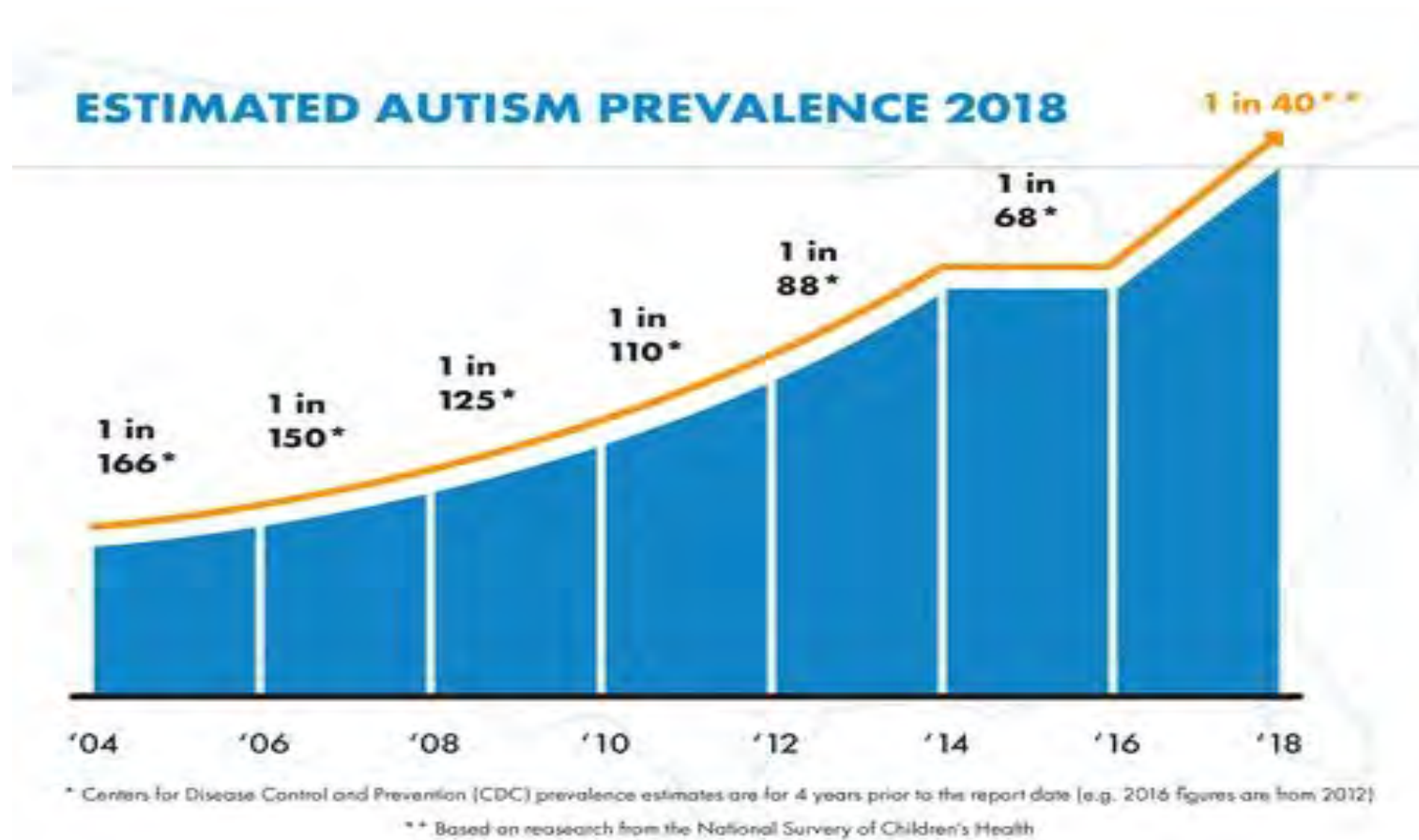
**2016, almost 43% had four or more additional disabilities**

2016 National Deaf-Blind Child Count Summary (Ages Birth – 21)

	%
Normal (< 27 dB, ANSI)	NA
Mild (27-40 dB, ANSI)	14
Moderate (41-55 dB, ANSI)	19
Mod-severe (56-70 dB, ANSI)	15
Severe (71-90 dB, ANSI)	11
Profound (91 dB & above, ANSI)	20
Documented Functional Loss	13

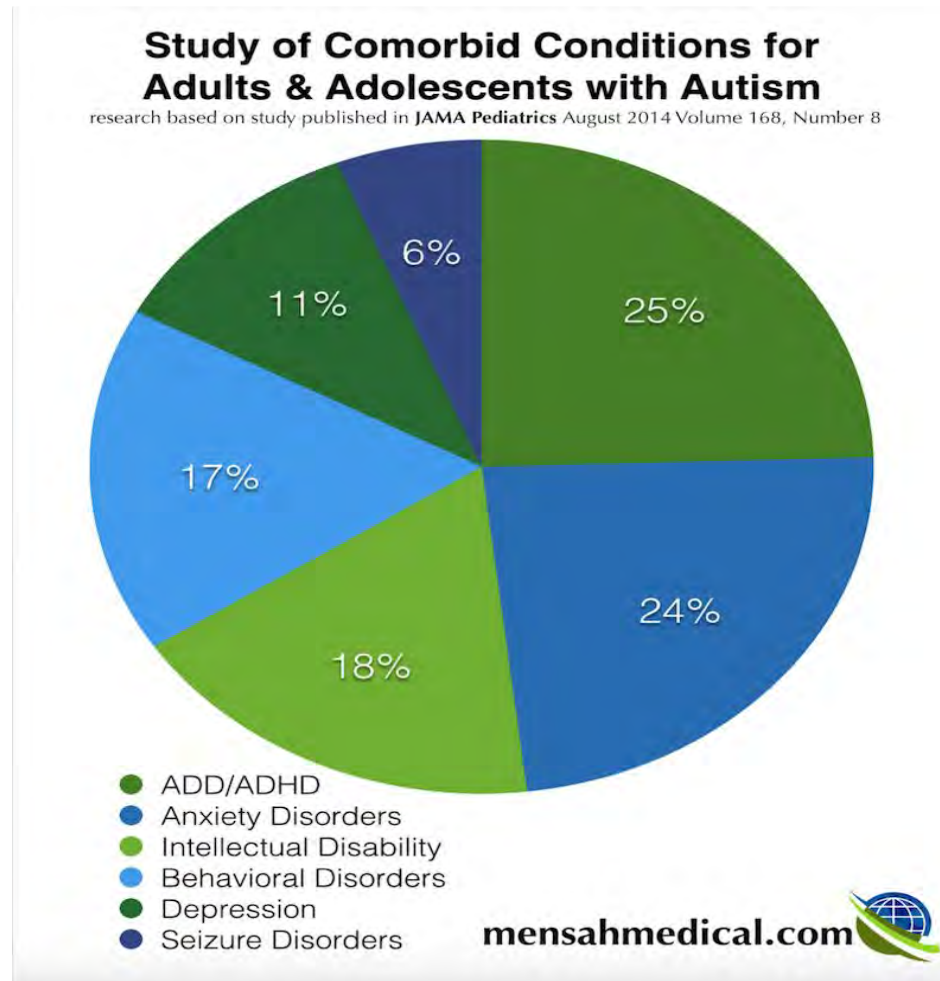
	%
Low Vision	32
Legally Blind	25
Totally Blind	5
Documented Functional Loss	22
Cortical Visual Impairment	21

# ASD Statistics





# ASD Statistics



# DVI HOLDOVER 2021 Appendix C

Bonnie L Miller  
September 3, 2020

## DVI Training & Organizational Development Summary and Recommendations

*The following is a summary of discussions with the Division for the Visually Impaired Director Sandra Miller and Deputy Director Debbie Talley, regarding training and organizational development needs. The summary lists the many ideas generated by the three of us, and from the Sunset Review, as well as recommendations for moving forward. The purpose will be to review the summary and further prioritize and narrow the path forward.*

*This document also included samples of project and strategic goals matrixes that show ways we can organize, create accountability, and track progress.*

### Needs/Wants (Sandi & Debbie)

#### Team Work

- **Work as a team** – support each other
  - Support co-workers to move clients through the process – One-Stop-Shop
  - Understand that a client can be in our services from birth to end of life
  - Promote all services & work with those in different specialties
- **Improve policies & procedures**
  - Be accountable
  - Consequences
- **Help managers complete training with employees**
- **New Employee Orientation/Onboarding (NEO)**
  - Present draft NEO to ALL staff. Allow for feedback and revision.
  - Next step to revise their unit specific on the job training (OJT)
- **Training to address:**
  - Planning
  - Communication
  - Policy & Procedure Development
  - Standards
  - Competencies

- Accountability
  - Developing Goals
  - RACI (Responsible, Accountable, Consult, Inform)

### **Communication**

- Develop a Communication Plan (Long-term around priority projects)
- Communicate with constituents – Internal and External
- Communicate with staff at all locations – especially while we work remotely
- Build trust through improved communications
- Generate regular communications (email, newsletter, social media, phone, etc.)
- Training to Address:
  - Expectations
    - Accountability – performance Evaluation
  - Communication tools
    - Assessments/Training/Self-Directed Readings/Activities (Staff)
    - Guidelines for services

### **Recommendations**

- Outline Action Plan/Priorities
- Plan Strategy with leadership
- Strategic Planning Retreat (virtual – 2 sessions with follow up)
  - Subsequent sessions on goal/strategic initiative development
- Begin with the Sunset Review recommendations
- Review the DHSS Strategic Plan looking for overlaps and similar needs/goals

### **Bonnie**

- As a new employee, establish relationships with staff through meetings, phone, email, etc.
- Present DISC at October Leadership meeting
- Develop Training Plan (short – long term)
  - Use existing data
  - Begin with leadership – DiSC (10/20)

- Start with ALL staff to creating cultural change
- Develop New Employee Orientation
  - Begin with existing staff and allowing for feedback and recommendations that will improve for new employees
- Work with managers to create next step orientation (OJT)
- Create survey, discussions, polls, focus groups, etc. (short – long term) to determine needs
- Develop Strategic Plan (Long-term)
  - Strat Plan Process:
    - Retreat (virtual – 2 sessions)
    - Follow up
    - Meetings to develop strategic Initiatives/goals – This would probably be a “training” for leadership
      - Align with DHSS
      - Unit specific
      - Accountability (RACI)

### **Next Steps**

- Review Summary – Sandi, Debbie
- Discuss, revise, prioritize – Sandi, Debbie, Bonnie
  - Further develop Action Plans
  - Begin Scheduling

**DVI Training Plan  
Internal Training & OD**

Training/OrgDev Initiative	Key Deliverables	Measure of Success	Owner	Key Mgrs.	Timeframe	Status
<b>OD Change Management:</b> <ul style="list-style-type: none"> <li>• <b>Strategic Planning to include a Training &amp; Communication Plan</b></li> <li>• <b>Culture change &amp; Teambuilding</b></li> <li>• <b>Improved Communications</b></li> <li>• <b>Develop/Accept &amp; Communicate Expectations</b></li> </ul>	<ul style="list-style-type: none"> <li>• Create a strategic plan that aligns with DHSS strategic plan</li> <li>• DiSC Behavioral Styles Training. Continue DiSC at future Leadership meetings</li> <li>• Develop a process that includes training, meetings, development of new norms, 1-1 &amp; group communications - Individual Development Plan (IDP) feedback</li> </ul>	<ul style="list-style-type: none"> <li>• Consistent communications</li> <li>• Develop strategic goals &amp; a Strategic Plan for DVI</li> <li>• Help Leadership Team develop greater collaboration and support of each other &amp; DVI services</li> <li>• Assess the training needs of DVI</li> <li>• Create a communication plan to improve internal and external information which will help staff stay abreast of information and increase community outreach</li> </ul>	<b>Bonnie Sandi Debbie</b>	<b>Leadership Team</b>	<b>Ongoing Fall 2020 - 2021</b>	<b>In Development</b> <ul style="list-style-type: none"> <li>• <b>Training Survey (Draft)</b></li> <li>• <b>Strategic planning – Nov. 5</b></li> <li>• <b>Teambuilding – Oct. 6</b></li> <li>• <b>IDP &amp; Guide completed – Nov. 2020</b></li> </ul>
<b>DiSC Behavioral Styles</b>	<ul style="list-style-type: none"> <li>• Complete online assessment</li> <li>• Discuss DiSC, it's relevance to understanding oneself; improving communication, teambuilding, &amp; interpersonal interactions</li> <li>• Applying DiSC knowledge at work</li> </ul>	<ul style="list-style-type: none"> <li>• Understanding person behavioral styles using DiSC.</li> <li>• Able to read other's styles</li> <li>• Able to adjust communication to meet other's needs</li> </ul>	<b>Bonnie</b>	<b>Leadership Team</b>	<b>October 2020</b>	<b>Completed 10/6/20</b>



**DVI Training Plan  
Internal Training & OD**

<b>New Employee Orientation</b>	<ul style="list-style-type: none"> <li>• DiSC Behavioral Styles Oct. 6, 2020</li> <li>• </li> </ul>	<ul style="list-style-type: none"> <li>• New employees feel welcomed and acquainted to DVI</li> <li>• Understand DVI services, people in charge, benefits</li> </ul>	<b>Bonnie</b>	<b>Leadership</b>	<b>January 2021</b>	<b>Developing</b>
<b>Individual Development Program</b>	<ul style="list-style-type: none"> <li>• Develop &amp; implement an organizational tool to guide individuals in their development. This is a compliment to Performance Evaluation – it is not one in the same.</li> <li>• Develop written guide to help staff complete IDP</li> </ul>	<ul style="list-style-type: none"> <li>• Train supervisors/managers to hold staff accountable to skills improvement, evaluation recommendations, etc.</li> </ul>	<b>Bonnie</b>	<b>Supervisors</b>	<b>December 2020</b>	<b>Developing</b>

## Sample Strategic Initiatives Matrix

Identify the Strategic Initiative, Administration Goal, or E&T Sub-goal that your objective supports:	Operational Objective and/or Key Deliverables for FY 2020-21	Measure	Primary Owner	Secondary Owner
<i>This could come from the DHSS plan or JLOSC, plus any new DVI strategies</i>	<i>Increase enrollment, meet state or federal requirement, Implement a new program goal, etc.</i>	<i>%, \$ amt., #, Implementation of a system/service, etc.</i>	<b>RACI</b>	<b>RACI</b>
Goal 1	Specific Objective			
Goal 2	Specific Objective			
Goal 3	Specific Objective			

## DVI STRATEGIC GOALS & OBJECTIVES

Strategic Initiative	Key Deliverables	Measure of Success	Owner	Key Mgrs.	Key Resources	Timeframe	Status
<b>GOAL 1: Develop a person-centered approach to the service delivery system to meet the multi-faceted needs of individuals and families.</b>							
Create a delivery system for person-centered services	<ul style="list-style-type: none"> <li>Revise/create a guide for staff and clients</li> <li>Develop a checklist/process (beginning with referrals) for staff and clients</li> <li></li> </ul>	Produce a booklet		Erin Jamie			
<b>GOAL 2: Improve the public health and safety infrastructure to protect the well-being of all Delawareans.</b>							
Improve DVI reputation across the state through work with state councils	<ul style="list-style-type: none"> <li>Develop an outreach/marketing plan to include:                             <ul style="list-style-type: none"> <li>Attendance at state councils, non-profits and similar agencies. Gain advocacy</li> <li>Training for providers, vendors</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Added partnerships</li> <li>Improved support from state agencies</li> <li>Workplan</li> </ul>		Rob Michele			



# DVI STRATEGIC GOALS & OBJECTIVES

Develop a Communication Plan	<ul style="list-style-type: none"> <li>• Training to Improve language used</li> </ul>			Matt Jill			
<b>GOAL 6:</b> Strengthen the <b>Department-wide planning structure</b> to support continuous improvement and increased efficiency, including routinely capturing feedback from staff, customers, and stakeholders.							
Annual Planning	<ul style="list-style-type: none"> <li>• Input from all stakeholders</li> <li>• Implement Individual Development Plan tool to help staff develop SKA</li> </ul>			Debbie Olu			

DVI HOLDOVER 2021 Appendix D

Division for the Visually Impaired  
Program Staff Qualifications and Requirements

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## Vocational Rehabilitation Program

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
Social Services Senior Administrator	Same as classification	3 yrs. experience		
Vocational Rehabilitation District Administrator	Same as classification	Bachelor's Degree 3 yrs. experience		
Vocational Rehabilitation Senior Counselor	Same as classification	Master's Degree 2 yrs. Experience	Certified Rehab Counselor (CRC)  CEU's / 5 years to maintain CRC	Commission on Rehabilitation Counselor Certification  CRC exam fee reimbursed for passing grade.  CRC-CEU req'd class fees reimbursed with passing and 2 yr. DVI commitment.
Vocational Rehabilitation Counselor II	Same as classification	Master's Degree 1 yr. Experience	Certified Rehab Counselor (CRC)  CEU's / 5 years to maintain CRC	Commission on Rehabilitation Counselor Certification  CRC exam fee reimbursed for passing grade.  CRC-CEU req'd class fees reimbursed with passing and 2 yr. DVI commitment.

Division for the Visually Impaired  
Program Staff Qualifications and Requirements

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
Employment Services Specialist II	Business Consultant	1 yr. experience		Business Engagement
Employment Services Specialist II	Pre-ETS Coordinator	1 yr. experience		IEP, Pre-ETS
Employment Services Specialist II	Career Development Specialist	1 yr. experience		Career Counseling
Administrative Specialist I	Same as classification	6 months		

**Additional information:** Suggestions for training or certifications that you believe would be beneficial: **Ethics & VR basics for VR Counselors**

## Business Enterprise Program

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
Business Enterprise Program Director	Same	3 yrs. experience		
Visually Impaired Business Service Supervisor	Same	3 yrs. experience		

**Additional information:** Suggestions for training or certifications that you believe would be beneficial: **Randolph Shepard-Hadley courses for BEP Director**



## Education & Orientation/Mobility

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
Teacher, Special Education (10 month + 38 days)	Teacher of Students with Visual Impairments (TVI)	<p>State of Delaware Teacher of Students with Visual Impairments Certification</p> <ul style="list-style-type: none"> <li>Bachelor's Degree</li> </ul> <p>-or-</p> <p>Special Education Teacher Certification w/5 years teaching experience <b>AND</b></p> <ol style="list-style-type: none"> <li>commitment to achieve State of Delaware Teacher of Students with Visual Impairments certification within two years from date of hire at time of application.</li> <li>Demonstrate Braille literacy as evidenced by achieving a passing score on a Braille Proficiency test within two years from the date of hire.</li> </ol>	Master's Degree	<ol style="list-style-type: none"> <li>TVI <ul style="list-style-type: none"> <li>\$100 Application Fee (reimbursable upon employment in a Delaware public or charter school)</li> <li>90 clock hours of Professional Development required every 5 years to maintain certification</li> </ul> </li> <li>Alternative Routes to Certification (ARTC) <ul style="list-style-type: none"> <li>Required class fees reimbursed with passing grades and 3-year DVI commitment.</li> <li>90 clock hours of Professional Development required every 5 years to maintain certification</li> </ul> </li> <li>Braille Literacy Proficiency Test (passing score) required to obtain a Teacher of Students with Visual Impairments Bachelor's or Master's Degree at an accredited university</li> <li>State of Delaware and Federal Bureau of Investigation Criminal Background Check <ul style="list-style-type: none"> <li>Agency absorbs fee (\$65)</li> </ul> </li> </ol>
Teacher, Special Education –	Certified Orientation and Mobility	<p>Academy of Certification of Vision Rehabilitation &amp; Education Professionals (ACVERP) Certified Orientation and Mobility Specialist (COMS) License</p> <ul style="list-style-type: none"> <li>Bachelor's Degree</li> </ul>	Master's Degree	<ol style="list-style-type: none"> <li>Certified Orientation and Mobility Specialist exam <ul style="list-style-type: none"> <li>Eligibility Fee: \$130.00</li> <li>Exam Fee: \$490.00</li> </ul> </li> </ol>

Division for the Visually Impaired  
Program Staff Qualifications and Requirements

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
Orientation and Mobility	Specialist (COMS)			<ul style="list-style-type: none"> <li>• Certification Fee: \$115.00</li> </ul> <p>2. Recertification every 5 years</p> <ul style="list-style-type: none"> <li>• 100 points of Continuing Education credit required every 5 years to maintain license</li> <li>• Recertification Fee: \$375</li> </ul> <p>3. State of Delaware and Federal Bureau of Investigation Criminal Background Check</p> <ul style="list-style-type: none"> <li>• Agency absorbs fee (\$65)</li> </ul>
Administrative Specialist 1		<p>Six months experience in:</p> <ol style="list-style-type: none"> <li>1. coordinating office activities such as planning/coordinating meetings or conferences; tracking workflow and follow up; composing meeting notes; directing clients/customers; explaining services to the public and customers/clients; establishing or maintaining filing/record systems.</li> <li>2. document processing which includes reviewing and evaluating records for completeness and conformity with laws, rules, regulations, standards, policies and procedures, resolve deficiencies, interpret information, and track and monitor activities.</li> <li>3. using standard computer software programs for word processing, spreadsheets or databases.</li> <li>4. sing an automated information system to enter, update, modify, delete, retrieve/inquire and report on data.</li> </ol>		<ol style="list-style-type: none"> <li>1. State of Delaware and Federal Bureau of Investigation Criminal Background Check</li> </ol> <ul style="list-style-type: none"> <li>• Agency absorbs fee (\$65)</li> </ul>

**Additional information:**

Suggestions for training or certifications that you believe would be beneficial.

Alternate Route to Certification Teachers and Administrative Specialists:

Hadley School for the Blind Coursework

1. Basic Braille by Sight: Reading Series
2. Basic Braille by Sight: Writing Series

Division for the Visually Impaired  
Program Staff Qualifications and Requirements

**3.** Adjusting to Vision Loss

## Training and Technology Center

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
Trainer Educator II	Same as classification	<p><b>At least 1 Year experience:</b></p> <ul style="list-style-type: none"> <li>Presenting training or education courses using a variety of training methods.</li> </ul> <p><b>Six months experience in:</b></p> <ul style="list-style-type: none"> <li>Preparing and developing training or education courses which includes designing learning objectives, curricula and materials</li> <li>Developing and analyzing training needs assessments at the individual, job or organizational level.</li> </ul> <p><b>Knowledge of:</b></p> <ul style="list-style-type: none"> <li>Methods, principles and techniques in development and implementation of education and training programs.</li> <li>Training resources and materials.</li> <li>Adult education/training.</li> <li>Methods and techniques of conducting needs assessment.</li> <li>Applicable state, federal and departmental laws, rules, regulations, policies, procedures, and processes pertaining to agency and program area.</li> <li>Principles and techniques of effective communication.</li> <li>Program evaluation techniques and monitoring devices.</li> <li>Methods, principles, and techniques used to improve individual and group performance.</li> <li>Ability to identify and analyze problems/needs/issues and assess the impacts.</li> <li>Ability to establish and maintain effective working relationships with a variety of people.</li> </ul> <p><b>Responsibilities:</b></p> <ul style="list-style-type: none"> <li>Conduct training/education services in one or more subjects.</li> </ul>	<p><b>Teaching Certification</b></p> <p><b>Paraeducator Certification</b></p> <p><b>Certified Assistive Technology Instructional Specialist</b> (Academy for Certification of Vision Rehabilitation &amp; Education Professionals)</p> <p><b>Certifications demonstrating working knowledge of assistive technologies used by the blind and visually impaired</b> (Example: Texas School for the Blind and</p>	<p><b>Beneficial Workshops to complete:</b></p> <p><i>Hadley School:</i></p> <ul style="list-style-type: none"> <li>Braille</li> <li>Basic Braille by Sight: Reading Series</li> <li>Basic Braille by Sight: Writing Series</li> <li>Contracted Braille by Sight: Reading Series</li> <li>Contracted Braille by Sight: Writing Series</li> <li>Producing Braille using a Perkins Braille</li> </ul> <p><i>Perkins School for the Blind:</i></p> <p><b>Perkins Braille Repair Training Workshops:</b> General Maintenance and Minor Repair Major Repair</p>

Division for the Visually Impaired  
Program Staff Qualifications and Requirements

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
		<ul style="list-style-type: none"> <li>• Develop needs assessment instruments, analyze data, and recommend appropriate learning solutions.</li> <li>• Design learning objectives/curricula/materials.</li> <li>• Review and critique course curricula, presentations, and participant achievement.</li> <li>• Develop instruments/methods to assess instructional quality/effectiveness.</li> <li>• May participate in budget, contract, and/or grant development.</li> </ul> <p><i>Regular contacts are typically with state employees and others outside state government primarily for the purpose of gathering and evaluating information, providing recommendations, and presenting training.</i></p>	<p>Visually Impaired)</p> <ul style="list-style-type: none"> <li>○</li> </ul>	<p>Related Assistive Technology webinars, demonstrations that focus on the hardware and software used by the visually impaired</p> <p>Knowledgeable of using hardware and software to perform services with clients remotely and virtually</p> <p>Utilize formalized tools to conduct:</p> <ul style="list-style-type: none"> <li>• Assessments</li> <li>• Demonstrations</li> <li>• Training</li> </ul> <p>Work with and provide technical assistance to:</p> <ul style="list-style-type: none"> <li>• The business community</li> <li>• Family members</li> <li>• Internal DVI staff</li> <li>• And the community</li> </ul> <p>to provide recommendations, customize, adapt and maintain access technology</p>

Division for the Visually Impaired  
Program Staff Qualifications and Requirements

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
				Provide services in the consumer's home, place of employment, educational setting, libraries, and/or any environment that is crucial to the success of the consumer using the assistive/access technology in order for them to reach their educational and/or vocational goals

**Additional information for Trainer Educator II:**

Suggestions for training or certifications noted in '*Additional Information*' column above

## Instructional Materials and Resource Center

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
<b>Senior Librarian (BP# 6012)</b>	Same as classification	<p><b>Required:</b></p> <ul style="list-style-type: none"> <li><b>Bachelor Degree</b> in Library and Information Science, English, Education, Computer Science or <b><u>related field</u></b></li> </ul> <p><b>Six months experience in:</b></p> <ul style="list-style-type: none"> <li>Organizing and coordinating library services and programs</li> <li>Assisting users in navigating information sources and providing reference or information desk services</li> </ul> <p><b>Knowledge of:</b></p> <ul style="list-style-type: none"> <li>Library and information services</li> <li>In-house and outside collection of information resources</li> </ul>	<p><b>Degree:</b> <b>Bachelor Degree</b> in Library Science</p>	<p><b>Ability to:</b></p> <p>Receive, research and monitor the incoming requests for books and instructional materials from Delaware's accessible instructional materials (AIM Delaware <a href="http://www.aimdelaware.org">www.aimdelaware.org</a>) Center</p> <p>Determine the most cost effective and efficient solution to provide the requested accessible instructional materials</p> <p>Research instructional material and equipment searches for teachers of the visually impaired through the use of internal, local and national resources and systems.</p> <p>Develop surveys and feedback</p>

Division for the Visually Impaired  
Program Staff Qualifications and Requirements

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
				<p>Prepare information depicting client utilization of materials</p> <p>Provide technical knowledge regarding the production of accessible instructional materials</p> <p><b>Beneficial:</b> Training and Certification from Library of Congress: Braille Transcriber</p>
<b>Volunteer Service Administrator (BP#83443)</b>	Same as classification	<p><b>Three years experience in:</b></p> <ul style="list-style-type: none"> <li>• Volunteer recruitment</li> </ul> <p><b>Six months experience in:</b></p> <ul style="list-style-type: none"> <li>• Volunteer recruitment</li> <li>• Interpreting laws, rules, regulations, standards, policies, and procedures</li> <li>• Supervising volunteers</li> <li>• Narrative report writing</li> </ul> <p><b>Knowledge of:</b></p> <ul style="list-style-type: none"> <li>• Reviewing and evaluating the work of volunteers</li> <li>• Functions and resources of the community's <i>human services network</i>.</li> <li>• The methods and techniques which may be used to relate the needs of the agency to resources in the community</li> <li>• Establishing and maintaining working relationships with outside entities</li> <li>• Interpreting laws, rules and regulations governing volunteer programs</li> </ul>	<p><b>Membership:</b> Delaware Association of Volunteer Administration (DAVA)</p>	<p><b>Provides Support to the Instructional Materials and Resource Center (IMRC):</b></p> <p><b>Assist with:</b> Receiving, researching and monitoring of incoming requests for books and instructional materials from Delaware's accessible instructional materials (AIM Delaware <a href="http://www.aimdelaware.org">www.aimdelaware.org</a>) Center</p> <p>The IMRC to ensure efficient receipt, production, distribution</p>



Division for the Visually Impaired  
Program Staff Qualifications and Requirements

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
				<p>and tracking of materials in order to ensure consistent and timely customer service to patrons.</p> <p>Monitoring and replenishment of supplies and other inventory</p> <p>Processing of requests that will be billed to the customer</p> <p>Tracking, monitoring and disbursement of requests to customers</p> <p>Data entry of transactions into the IMRC tracking systems (AIM portal, Microsoft Access databases, and Spreadsheet for school year requests)</p> <p>Backup of files to network drive for safekeeping</p>
<b>Supply Storage and Distribution Technician</b>	Same as classification	<b>Six months experience in:</b> <ul style="list-style-type: none"> <li>Inventory control (ordering, receiving, tracking, storing and handling inventory)</li> </ul>		Operating Material Handling Equipment to

Division for the Visually Impaired  
Program Staff Qualifications and Requirements

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
		<ul style="list-style-type: none"> <li>• Dispersing: <ul style="list-style-type: none"> <li>○ Materials</li> <li>○ Supplies</li> <li>○ Equipment</li> </ul> </li> <li>• Operating Material Handling Equipment to stock/transport materials: <ul style="list-style-type: none"> <li>○ Medium size trucks</li> <li>○ Forklifts</li> <li>○ Pallet Jacks</li> <li>○ Hand Trucks</li> <li>○ Dollies</li> <li>○</li> </ul> </li> <li>• Creating reports</li> </ul> <p><b>Knowledge of:</b></p> <ul style="list-style-type: none"> <li>• Routine maintenance: <ul style="list-style-type: none"> <li>○ Record keeping</li> <li>○ Stock rotation and replenishment</li> <li>○ Inventories</li> </ul> </li> <li>• Specialized Material Handling procedures for assigned inventory: <ul style="list-style-type: none"> <li>○ Identification</li> <li>○ Assembly</li> <li>○ Inspection</li> <li>○ Operation</li> <li>○ Test</li> <li>○ Demonstration</li> <li>○ Disinfection</li> <li>○ Sterilization</li> <li>○ Other related specialized material handling procedures as required</li> </ul> </li> <li>• Balance and verify recordkeeping from: <ul style="list-style-type: none"> <li>○ Sales orders</li> <li>○ Invoices</li> </ul> </li> </ul>		<p>stock/transport materials:</p> <ul style="list-style-type: none"> <li>• Step Ladder with wheels</li> </ul> <p>Operating Material Handling Equipment to aid in the production of accessible instructional materials:</p> <ul style="list-style-type: none"> <li>• Powered Guillotine cutting machine</li> </ul>

Division for the Visually Impaired  
Program Staff Qualifications and Requirements

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
		<ul style="list-style-type: none"><li>○ Requisitions</li><li>○ Other [related] postings</li></ul>		

**Additional Information for Supply Storage and Distribution Technician I:** As noted in the Supply, Storage and Distribution Technician I Job Recruitment #073119-MAGA04-350800, The Summary Statement is as follows: “The incumbent in this position is the custodian of supplies and materials of the Division for the Visually Impaired’ s Instructional Materials and Resource Center. Duties include: assisting with providing accessible educational and instructional supplies and materials by creating, cataloging, deploying and tracking items, updating the database and maintaining production equipment.”

**Suggestion for the Supply Storage and Distribution Technician I:** Perkins Braille Repair Training Workshops:

- General Maintenance and Minor Repair and Major repair – *as the previous incumbent in this position participated in this course and received certification for the levels completed.*

## Independent Living Services

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
Social Service Administrator	Same as classification	Five years of experience doing human service work.  One year of experience administering a human service program including developing policies and procedures, report writing, and interpreting laws, rules and regulations.	Bachelor's Degree in Human Services	
Trainer/Educator II	Vision Rehab Therapist	At least one year of experience presenting training or education courses using a variety of training methods.  Six months experience in preparing and developing training or education courses which includes designing learning objectives, curricula and materials  Six months experience in developing and analyzing training needs assessments at the individual, job or organizational level.	Work towards obtaining Braille certification	
Trainer/Educator III	Senior Vision Rehab Therapist	At least two years of experience presenting training or education courses using a variety of training methods.  Six months experience in preparing and developing training or education courses which includes designing learning objectives, curricula and materials  Six months experience in developing and analyzing training needs assessments at the individual, job or organizational level. Possess Braille certification	Maintain Braille Certification	
Administrative Specialist I	Same as Classification	Six months experience in coordinating office activities such as planning/coordinating meetings or conferences; tracking workflow and follow up; composing meeting notes; interacting		

Division for the Visually Impaired  
Program Staff Qualifications and Requirements

Classification	Job Title	Qualifications / Certifications	Preferences	Add'l Information
		<p>with consumers; explaining services to the public and consumers; establishing or maintaining filing/record systems.</p> <p>Six months experience in document processing which includes reviewing and evaluating records for completeness and conformity with laws, rules, regulations, standards, policies and procedures, resolve deficiencies, interpret information, and track and monitor activities.</p> <p>Six months experience in using standard computer software programs for word processing, spreadsheets or databases.</p> <p>Six months experience in using an automated information system to enter, update, modify, delete, retrieve/inquire and report on data.</p> <p>Perform work vital to the operation of the ILS unit Support VRTs and Social Service Administrator Serve in Admin pool</p>		

**Additional information:**

Suggestions for training or certifications that you believe would be beneficial.

Attend Conferences that facilitate professional development

Take individual online courses pertaining to vision loss.

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## Introduction

The Delaware Division for the Visually Impaired (DVI) Employee Manual is designed as a quick source of reference when staff want to review key personnel policies, reflect upon the mission and values, or reinforce our ethical standard.

DVI is committed to maintaining an ethical environment where all staff, treat persons who are blind with dignity and respect and provide the best possible services based on current techniques and principles.

It is the responsibility of all DVI staff members to read, ask for clarification, and acknowledge understanding of the policies. This document is intended to supplement State of Delaware Human Resources policies. DVI staff are required to sign this policy manual within two weeks of beginning employment with DVI.

## DVI Mission, Vision & Values

### Mission

The mission of DVI is to provide educational, vocational, and technical support to empower and foster independence for Delawareans with visual impairments.

### Vision

DVI is a leader in creating a world without barriers for individuals with vision loss.

### Values

#### Teamwork

- Working together to support each other and our customers.
- All units work together to achieve the best outcomes for our consumers - collaboration.
- DVI strengthens partnerships by coordinating, using resources and implementing ideas.
- DVI respects customers, co-workers and stakeholders by listening and fostering a shared understanding of goals.
- We communicate.

#### Quality Customer Service

- Responsive; accountable; providing quality service and product; promoting kindness and empathy; professional.
- Commitment to customer: Solutions based upon your needs.
- We invest in each other and our community in delivering quality products and services.
- Being responsive: Service delivery is paramount.
- We believe in the capacity of others to achieve their maximum potential.

#### Respect

## Delaware Division for the Visually Impaired Employee Manual

- Interactions should start and end with mutual respect.
- Treat everyone as if they were related to you.
- We value diversity and strongly believe that RESPECT is key to everyone... clients, colleagues, and stakeholders.

### Innovation and Creativity

- We enable access through technology and innovation.
- Looking at the status quo and seeing if we can do things better in a different way.
- Using creativity to provide the best possible service available.

### Fostering Independence

- Provide opportunities to practice skills in a supportive environment.
- Helping others to help themselves.
- Assist individuals who are blind and visually impaired to develop skills necessary to live as independently as possible or reach their full potential.
- Fostering independence through partnership.

### Integrity

- We believe in honesty, transparency and professionalism for all individuals - consumers, co-workers, and the public.
- Integrity - internally and externally.
- We strive to provide services that we believe in.
- Demonstrate honesty and respect in our daily interactions with each other and our customers.
- Making ethical choices when dealing with customers.
- We are an ethical, fair, and honest service organization.

### DVI staff demonstrate:

- Passion for what we do everyday
- Commitment to make positive differences in the lives of blind Delawareans
- Respect for the contributions of each staff member
- Ethical behavior, honesty, integrity and trustworthiness
- Innovative and proactive approaches in serving each client.
- Progressive and professional leadership
- Collaboration and teamwork that benefits each individual we serve
- Collaboration with community, local, state and federal partners



## Code of Ethics

DVI is committed to sustaining integrous relationships with all stakeholders<sup>1</sup>, providing services in a fair and impartial manner, and maintaining compliance with Federal, State and local laws. DVI employees are required to consistently uphold the established standards below:<sup>2</sup>

1. Public service is a public trust, requiring employees to place loyalty to the State of Delaware, the laws, and ethical principles above private gain.
2. Employees shall not hold financial interests that conflict with the conscientious performance of duty.
3. Employees shall not engage in financial transactions using nonpublic State, DHSS, or DVI information or allow the improper use of such information to further any private interest.
4. An employee shall not, except pursuant to such reasonable exceptions as are provided by regulation, solicit or accept any gift or other item of monetary value from any person or entity seeking official action from, doing business with, or conducting, activities regulated by the employee's agency, or whose interests may be substantially affected by the performance or nonperformance of the employee's duties.
5. Employees shall put forth honest effort in the performance of their duties.
6. Employees shall make no unauthorized commitments or promises of any kind purporting to bind the State, DHSS, or DVI.
7. Employees shall not use public office for private gain.
8. Employees shall act impartially and not give preferential treatment to any private organization or individual.
9. Employees shall protect and conserve State property and shall not use it for other than authorized activities.
10. Employees shall not engage in activities, including seeking or negotiating for employment, that conflict with official State, DHSS, or DVI duties and responsibilities.
11. Employees shall disclose waste, fraud, abuse, and corruption to appropriate authorities.
12. Employees shall satisfy in good faith their obligations as citizens, including all just financial obligations, especially those—such as Federal, State, or local taxes—that are imposed by law.

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<sup>1</sup> Stakeholders defined as consumers, families, government entities, businesses, advocates, and coworkers.

<sup>2</sup> COE adapted from the "Principles of Ethical Conduct for Government Officers and Employees", U.S. Office of Government Ethics, Washington, DC. 20005

13. Employees shall adhere to all laws and regulations that provide equal opportunity for all Americans regardless of race, ethnicity, religion, sexual orientation, gender, gender identification, disability, political affiliation, or consumer group membership.
14. Employees shall endeavor to avoid any actions creating the appearance that they are violating the law, or the ethical standards promulgated pursuant to this order.

## What Does DVI Expect from Employees?

DVI expects all employees to consistently:

1. We understand that staff work in various work environments and choose work attire based on daily activities. Staff are expected to ensure their appearance is appropriate for every work situation.
2. Staff will return emails and phone calls as soon as possible; preferably within 24 hours. Staff are expected to always consider consumer impact and prioritize communication activities accordingly.
3. When employees are unavailable, via phone or email, for more than one business day, they are expected to create an “out-of-office” email response (with an alternate contact) and change voicemail message. Messages should include the date of return and a contact person for emergency situations.
4. In order for DVI to effectively provide services, all staff and leadership will properly prepare for scheduled time off including:
  - a. Prepare to meet deadlines that are due during your scheduled time off, in advance. Failure to adhere to deadlines may lead to disciplinary action. Deadlines include reports, assigned projects, meetings, payroll obligations, service timelines, case record documentation, etc.
  - b. Ensure consumers and community partners are aware of your time off and have an alternate contact.
5. Be proactive and adopt a sense of urgency towards participants who express concerns at work, in the community or at home.
6. Staff must treat everyone with respect and dignity in all forms of communication including email, phone, face-to-face.
7. Employees will respectfully resolve disagreements in a professional manner. If coworker issues arise, staff are expected to handle the situation by using the following steps:
  - a. Speak directly with the colleague to address the issue and develop a strategy or solutions to rectify the problem.

- b. If employees are unable to come to an agreement, they are to ask their supervisor(s) for assistance.
  - c. If the employees and their supervisors are unable to come to an agreement, the director will resolve the dispute.
8. Embrace and contribute to changes in the workplace.
9. Seek new ways to collaborate and cooperate with co-workers, customers, managers and other business partners to achieve outcomes that benefit DVI and our consumers.
10. Practice active listening and effective communication.
11. Consistently execute duties and decisions in a timely and efficient manner.
12. Approach all work in a customer-centric manner and seek innovative solutions for customers and stakeholders.
13. Continually look for opportunities to improve, acquire new knowledge and skills and actively participate in workplace training opportunities.
14. Accept responsibility for the execution of essential functions and be accountable for all actions.
15. Adhere to the policies adopted by DVI, DHSS and the State of Delaware.

## **What Should Employees Expect from their Supervisor?**

DVI will provide consistent supervision to staff so they can confidently accomplish their professional duties. Supervisors provide employees with resources, tools, mentoring and support as they work to achieve their performance goals and advance the mission of DVI.

- DVI staff will participate in New Staff Orientation and supervisor facilitated training specific to their position. In addition, supervisors will assist employees to engage in industry-based learning opportunities and ensure all direct reports complete mandated training.
- All staff will be assigned an immediate supervisor who will oversee the duties, responsibilities and performance of their job description/assignments.
- Staff are required to inform the supervisor of pertinent developments, changes, concerns regarding participants, community contacts or any circumstance relevant to the agency's mission.
- Supervisors will meet regularly with assigned staff to provide mentoring, support and tools employees need to achieve successful outcomes. Regular meetings will include a review of consumer cases and participant files.

- Supervisors will provide direction/feedback as necessary and expect employees to seek feedback, advice and direction from their supervisor as needed.
- The supervisor and staff will participate in the formal evaluation process as outlined in the DHS policy.

## Consumer Equality

The DVI staff member shall provide services in a fair and equitable manner. Staff members recognize and appreciate the cultural components of economics, geography, race, ethnicity, religious and political factors, marital status and the sexual orientation of all blind clients of services. DVI staff will not withhold or limit services to any client or patron based on race, ethnicity, religion, sexual orientation, gender, gender identification, disability, political affiliation, or consumer group membership.

DVI provides person-centered customized services based on choice, independence, empowerment and community inclusion.

## Onboarding Team Members

DVI is committed to improving its overall diversity and will actively recruit job candidates who are part of racial and ethnic minorities, women, and people with disabilities. Because we recognize the positive impact having good blind role models has on our clients, we are committed to hiring competent blind people in all parts of our agency. We also encourage and promote the hiring of qualified blind people throughout state government. We are committed to assisting other state agencies in the removal of technological, societal and other barriers that have limited the employment of blind persons within state government.

DVI partners with nationwide professional organizations and universities that offer vision-related professional certifications to recruit for highly specialized positions such as Teachers for the Visually Impaired and Orientation/Mobility Specialist.

DVI prohibits discrimination in its employment policies and practices on the basis of race, creed, color, religion, national origin, sex, age, mental or physical disability, sexual orientation, or gender identity, consistent with applicable state and federal policies and regulations. It is also the policy of the executive branch of state government in the State of Delaware to apply affirmative action measures to correct the underutilization of females, minorities, and persons with disabilities in the state employment system whenever remedial measures are appropriate. The agency is an equal employment opportunity and affirmative action employer.

## Staff Qualifications and Training

- DVI employs professional staff who meet the qualifications outlined in **DVI Staff Qualifications**.
- Staff members will complete new staff orientation and ongoing training as directed by their supervisors (see **New Employee Orientation document**).

- Staff members whose positions require certifications and licensing are responsible for maintaining job qualifications and coordinating continuing education with their supervisor.
- Employees will participate in team building exercises during all staff meetings in some way, shape, or form.
- Employees and their supervisors are responsible for ensuring the Delaware Learning Center is used to track all training including external.

## Autonomy, Privacy and Confidentiality



DVI staff members must always respect consumer rights and encourage active collaboration with all aspects of service provision.

Staff members will respect the client right to choose as defined in the Informed Choice provision of the Vocational Rehabilitation Act. Staff will strive to provide relevant, factual service and program information and inform their supervisor if they learn of changes that could affect contracts. It is prohibited for DVI employees to conduct research using DVI consumers and/or their information without the approval of the Division Director and the Human Subjects Rights Review Committee. Statistical information only may be used without the client's consent.

The DVI staff member shall protect and keep confidential all privileged forms of written, verbal and electronic communication concerning the client, unless consent has been provided by the client, or unless otherwise mandated by local, state or federal laws or regulations. All staff members will read, understand and sign the Confidentiality Policy (PM-5) during their New Hire Orientation.

Information will be obtained from service providers and cooperating agencies using a release of information form signed by the client. A copy of all sent release forms are retained in the case file. Information providers will be assured that information received in this way will not be further released without the client's approval and permission from the vendor generating the information.

Judicial requests for consumer information must be submitted to the Deputy Attorney General's office via the DVI Director's office.

The client is to be informed that the provision of personal information is voluntary to the extent that withholding such information does not interfere with the determination of eligibility or development of the plan. If pertinent and necessary information is withheld, it may be considered failure to cooperate and lead to case closure.

Discussion of information with other DVI programs in which the client is enrolled is considered necessary for administration of the program and is acceptable. No disability specific information is shared beyond that allowed by the Americans with Disabilities Act without a release of information from the client.

## Hours, Flex Time and Leave

**Some items in this section are subject to temporary alterations because of the Covid-19 Pandemic. Supervisors will explain the way in which DVI is maintaining daily operations and serving consumers. The supervisors are expected to review the DVI Covid-19 Policy with employees.**

- DVI is open to the public from 8:00 a.m. until 4:30 p.m.
- Full-time staff are expected to work 37.5 or 40 hours/week.
- Casual/seasonal employees typically work less than 30 hours/week.
- DVI service times vary according to program and consumer need. As such, supervisors will develop and monitor employees' work and possibly break schedules.
- Staff who wish to change their hours must receive supervisory approval. Changing daily hours is subject to participant needs and therefore not guaranteed.
- Flex time-DVI staff are expected to adjust their work week to meet consumer needs during during non-traditional hours. In addition, staff are afforded the opportunity to adjust work times for minor personal reasons. As such, staff are required to ensure flex time is approved by the supervisor (or a member of leadership if immediate supervisor is unavailable) and flexed hours all occur within one work week. Misuse of the flex time terms may result in disciplinary action.
- Earning and using compensatory time must be approved by supervisors in advance and must adhere to the State and DHSS policies.
- Overtime must be approved in advance by supervisors in accordance with state policy.
- Unplanned absences must be reported according to procedures established by each supervisor. If employees are unable to reach their supervisor, they are to contact the Deputy Director or the Director. Employees are to adhere to the DHR policy for effectively managing unscheduled leave.
- Supervisors will approve or deny leave based on the coverage needs of their particular work unit. Certain agency business functions may require that one or more people be available during business hours. Supervisors have the right to limit the number of employees who can take leave at any given time for this reason. Leave will be approved on a first come/first serve basis.

## Social Media

Social media sites are an effective way to conduct outreach, generate interest in DVI, engage the community, raise awareness of visual impairments, market DVI events and workshops, communicate with stakeholders, and quickly circulate press releases. Employees may request to act as an editor of VI social networking sites, provided they have approval from their supervisor.

Employees are to adhere to the following guidelines:

1. Staff creating posts for social media sites are expected to prepare content, so it is accessible to people with screen readers.
2. Employees are expected to ethically represent DVI, protect reputations of consumers, co-workers and the Division, and minimize legal risks. .
3. When using social media for business or personal purposes, employees must protect the privacy of DVI, its employees, consumers, suppliers, and vendors and are prohibited from disclosing personal employee and non-employee information and any other proprietary, confidential, privileged, or non-public information to which employees have access.
4. DVI staff shall refrain from posting disparaging or defamatory statements about policies and administration, including social media communications that could damage the goodwill and reputation of the Division.

## Workplace Harassment

1. DVI is committed to providing an atmosphere which fosters growth, inspires teamwork and encourages professional dialogue. Any form of workplace harassment, violence, threats, or intimidation will not be tolerated.
2. DVI staff members are accepting to accept qualifications, views, contributions and recommendations of colleagues.
3. All DVI staff are required to complete workplace harassment training as assigned by the Department of Human Resources.

## Acknowledgement

I agree to uphold the Code of Ethics on pgs. 2-3 of the Employee Manual. I certify that I received a copy of the DVI Employee Manual, reviewed it with my supervisor, and was provided time ask questions.

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Employee Name	Employee Signature	Date
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*Supervisor Name	Supervisor Signature	Date
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***\*Supervisor** will detach the acknowledgement page and retain for records. The manual is to be handed back to the employee to retain for future reference.*

### Policy Dates

Approved: \_\_\_\_\_

Reviewed: \_\_\_\_\_

Revised: \_\_\_\_\_



## Division for the Visually Impaired

### Fleet Vehicle Policies/Protocols/Procedures

#### Policy 4

#### Scope

The Delaware Division for the Visually Impaired sets-forth the following policies, protocols, and procedures for the reservation and use of blocked Fleet vehicles assigned to the Division.

#### POLICIES/PROTOCOLS/PROCEDURES

The following policies, protocols, and procedures are to be followed and adhered to by all employees/authorized users of the Division to ensure efficient, professional, and courteous use of state-assigned Fleet vehicles to the Division, and to ensure fairness and respect towards all employee Fleet vehicle users.

#### VEHICLE RESERVATIONS

Vehicle reservations shall be made by sending an e-mail to the Administrative Specialist at Biggs or Milford and may not be made for more than one week at a time to ensure fairness and availability to all employees utilizing the DVI blocked vehicle pool. Vehicles should only be reserved for dates actually needed, and not blocked for excessive time in an effort to monopolize the vehicle for one person's use. If an employee's vehicle need changes; i.e., an appointment is cancelled, or a one-day reservation changes to a one-half day requirement; the employee shall make the change by e-mailing the Administrative Specialist at Biggs or Milford to allow other employees the opportunity to make use of the vehicle. If an employee suddenly has to be out of work for an unforeseen circumstance, the employee's Unit Supervisor or Administrative designee shall be responsible for alerting all DVI staff through e-mail that the employee's reserved vehicle is available for use. Blocked Fleet vehicles are not designated to one or a group of employees; they are specified for all DVI employees' usage.

All DVI employees/contractors shall use the e-mail system. It is imperative that the practice of reserving vehicles within the one-week time-frame be practiced at all locations to ensure reservation consistency and to track the usage of the vehicles.

- On all Biggs building requests, please E-mail Debra Mills-Joe and Alice Johnson with copy to Erin Weaver, Michele Hamilton, and your immediate Supervisor specifying your destination and the time you will need the car. Debra Mills-Joe and Alice Johnson shall serve as the official key keepers for the Biggs location.
- On all Milford requests, please E-mail Holly Jackson and Grisel Espinosa with copy to Erin Weaver and your immediate Supervisor specifying your destination and the time you will need the car. Holly Jackson and Grisel Espinosa shall serve as the official key keepers for the Milford location.
- Reservations can be made for up to one week. Reservations for the following week will be accepted beginning on Wednesday of the current week.
- The key keeper will notify you if a car is not available.

- All items usually stored in the cars will need to be removed from the car each day as you may not have the same car every day.
- All keys to each car will be kept by the key keeper.
- Keys should be returned to the key keeper upon your return once you are done using the car. Please also include the beginning and ending mileage for the time you used the car when returning the keys. A Notebook shall be available from the Administrative Specialist for each car at both Biggs and Milford.
- In the event you will need a car prior to the start of the day, the key will be maintained in the Administrative Specialists binder the day before for both Biggs and Milford.
- If both key keepers are unavailable, please contact Michele Hamilton or your manager.
- Each reservation shall be reviewed by the employee's respective Unit Manager and adjusted as needed for efficiency purposes.
- It is each employee's responsibility to adhere to the rules of Fleet Management regarding gasoline levels at the end of each day.

### RESERVATION REMOVAL

DVI blocked Fleet vehicles are assigned to DVI for the convenience and usage by all Fleet authorized DVI staff to conduct daily state-related business. Employees who have reserved a vehicle shall not have their reservation removed by another employee without expressed discussion with and consent by the originating reservation employee. If the originating reservation employee cannot relinquish their reservation, the requesting employee shall secure a non-assigned Fleet vehicle to DVI to meet their reservation need.

### SECURING OF KEYS

All DVI employees/authorized users are responsible for ensuring keys for the vehicles are returned promptly and properly to the designation of origin at the end of each work day. This practice shall be followed and adhered to for all circumstances to ensure that the vehicle is available for usage by another employee in the event the employee who has the vehicle reserved becomes ill, an appointment has changed or been cancelled, or the reserving employee is out for other circumstances and no longer requires the vehicle during the reserved time-frames. Vehicle keys shall be maintained in the designated key box which shall be placed in a location easily assessable to employees at all times and shall follow a sign-in/sign-out sheet protocol. A set of duplicate keys may be maintained at another location, and with the same sign-in/sign-out protocols, as a precautionary measure. This shall be done at the discretion of the Division Director and/or Division Deputy Director.

Employees/authorized users shall be held accountable for the vehicle keys from the time they are provided to the employee/authorized user to the time they are returned by the employee/authorized user. Employees/authorized users may not provide keys to another person, hoard keys, duplicate keys, or utilize keys for any other reason than their employee assigned purpose. If keys are lost or stolen, break, bend, or the employee/authorized user has any other issues regarding the assigned keys not aforementioned, the employee/authorized user must report the issue to the Director's Office Administrative Specialist immediately. It is the employee's/authorized user's responsibility to report any issues pertaining to the Fleet vehicle to the Director's Office Administrative Specialist, as the employee shall be held accountable for any issues not reported.

## VEHICLE LOCATION

Fleet vehicles assigned to DVI shall be parked and maintained in the designated Fleet vehicle locations at both the New Castle (Biggs) and Sussex County (Milford) locations. For New Castle County, vehicles are designated in the parking lot outside of the Sensory Garden entrance to the building by the ILS Unit, to the right side of the parking lot as you face the building in the parking lot. Vehicles may not be parked on the sides, back, or other entrance doors of the building. In Sussex County, Fleet vehicle spaces are noted in a designated area of the parking lot.

## PERSONAL EFFECTS

All personnel utilizing State DVI assigned Fleet vehicles are responsible for the general cleanliness, condition, and maintainment of the vehicle. It is the employee's responsibility to ensure that all personal effects, trash, recyclables, business documentation, and other such items are cleaned out of the vehicle immediately following the use of the vehicle. There is no smoking, eating, drinking, or transporting of unauthorized persons permitted in Fleet vehicles. These rules are strictly enforced by Fleet management, as well as the Division Director and Division Deputy Director.

## FUELING

All DVI assigned blocked Fleet vehicles are accompanied by a Fleet gas card (Fuelman) which is provided to the assigned vehicle driver along with the vehicle keys at the time the vehicle is signed-out through the Director's Office. All employees utilizing State Fleet vehicles are required to obtain gasoline for the vehicle when the fuel gauge reaches ½ tank or below. The employee last utilizing the vehicle will be held accountable for vehicles returned with low fuel (½ tank or below).

## USE OF FLEET VEHICLES

The utilization of State Fleet vehicles is a State employee privilege, not a right. State Fleet vehicles may not be used for personal use/non-State business use of any type at any time. Damage to any vehicle; both exterior as well as interior; must be reported immediately to the Director's Office and Fleet management. The employee shall be held accountable and responsible for rendering payment for any violation tickets they may receive such as speeding, parking, accident, or other such infractions while operating a State Fleet vehicle. Personal usage, damage, accidents, infractions such as speeding violations, parking violations, and general public complaints against employees while utilizing a Fleet vehicle shall be taken seriously and shall be reported to Fleet management for review. Continued infractions could result in the suspension or termination of an employee's Fleet vehicle usage.

## POLICIES

The above policies, protocols, and procedures shall be adhered to by all DVI personnel authorized to utilize DVI assigned blocked Fleet vehicles, as well as any Fleet vehicle. In addition, all DVI employees/authorized users permitted to utilize State Fleet vehicles are required to read the attached OMB/GSS Policies on State vehicle usage as well.



Division for the Visually Impaired

Internship Manual

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## Policy 8

### Preface

The Division for the Visually Impaired Internship Manual has been written to assist Interns and Divisional staff in providing an educational and practical Internship experience that will serve the individual Student Intern in future employment and career goal opportunities.

### Goals of the Internship Program

An internship is a structured academic opportunity that allows Interns to apply academic skills and knowledge in the workplace. Experiential education that is based on a set of Education objectives helps Interns Intern to prepare to meet career goals after graduation. The goals of the program are:

- To allow Interns to apply, evaluate, test, and integrate academic knowledge and theoretical concepts in a work setting;
- To develop and expand Interns' knowledge about themselves and their abilities, goals, and career interests in a work setting;
- To expand Interns awareness of the world beyond the campus by exposure to a variety of careers, disciplines, organizational cultures, and environments;
- To allow Interns to gain access to knowledge and technology not available on a traditional College Campus, and;
- To encourage Interns to take a greater responsibility for their education and life, and develop self-reliance, personal style, values, and beliefs in a manner consistent with becoming a responsible and productive individual;

### Policies of the Internship Program

Intern Eligibility:

- Interns must be in good academic standing to apply for an internship. A cumulative grade point average of at least 3.0 is preferred, but the final decision about participation shall rest with the Intern's Institution of Education Academic Department.
- Typically, Interns who participate in an Internship have Junior or Senior status in High School, or are in College; however, pending agreement between the Division and Intern's Academic Department, exceptions may be made to this on a case-by-case basis.

### Academic Credit

Academic credit shall be based upon the Intern's Institute of Education's credit structure.

### Inclement Weather

During times of inclement weather, Interns should refer to <https://delaware.gov> to verify if the State of Delaware is open or has a delay.

### Incident Reporting

The State of Delaware sets-forth and adheres to strict and enforceable Policies to ensure there shall never be bias or harassment towards any individual or group based upon gender, religious beliefs or practices, race, creed, origin, sexual orientation, sexual identification or reassignment, disability or requests for reasonable disability accommodations, bullying, or sexual harassment. If

an Intern perceives any of these incidents have been directed at them, they are to report the incident immediately to the Division Director's Office or Constituent Relations.

#### Intern Expectations and Responsibilities

Each Intern is afforded the opportunity to gain practical experience as relevant to their course of study through the Division for the Visually Impaired. Interns should ask questions, learn the inner-workings of their section of placement, and strive to complete their internship with having the following objectives in mind:

- Provision of a chance to explore career fields through first-hand experience;
- The promotion of development of confidence, maturity, responsibility, and skill in human relations;
- Enhancement of decision-making and analytical skills through experience in actual work environments;
- Have a more conceptualized understanding of theory by its actual application in practice;
- The development of a more positive attitude toward coursework as a result of seeing its usefulness on-the-job, which often leads to better grades, and;
- The gainfulness of professional experience to include on your resume, which can significantly improve your marketability to employers.

It is the responsibility of the Intern to ensure all Institution of Education procedures for the completion and documentation of their internship are completed properly so that Transcript credit may be obtained and documented. If the Intern requires any documentation or guidance from the Division's aspect, it is the responsibility of the Intern to seek out their Division Supervisor to request such documentation.

Each assigned Intern is expected to conduct themselves in a courteous and professional manner at all times whether it be interacting with Divisional staff, consumers, or visitors. This includes in-person, E-mail, or other electronic forms of communication. Interns shall also be expected to adhere to the following Divisional guidelines:

- Attire should be professional at all times. Business casual is acceptable. If an Intern is dressed inappropriately, they shall be asked to leave, and the incident shall be noted to their Institution of Education.
- Promptness in arriving and adherence to departure times are expected to be followed on a regular basis per the agreed upon daily start and ends between the Intern and their assigned Divisional Supervisor.
- A positive, professional demeanor is expected at all times. If the Intern would like to discuss a certain methodology to offer input, suggestions, or research, this is always most welcome. However, should an Intern disregard the State of Delaware Acceptable Use Policy and exhibit inappropriate behavior through the misuse of computers, phones, and



any other state issued technology, or participate in incidences of gossip, derogatory comments, or failure to follow Supervisor direction shall result in notification to the Intern's Institution of Education, a documented warning, and may result in the Intern's internship being terminated by the Division.

### Evaluation

Throughout the duration of the Intern's internship the Division Assigned Supervisor shall conduct a weekly meeting with the Intern to discuss the current standings from both the Division's and Intern's perspectives; answer any question or points of clarification the Intern might have; provide feedback to the Intern and suggested resources for the Intern to investigate; and document overall performance. Upon completion of the Intern's internship, the Division Assigned Supervisor, their Unit Manager, and the Intern shall all be responsible for completing the "Intern Service Documentation" Form (which was found in Appendix C of the Division's Internship Policy) for submission to the Intern's Institute of Education and retention in the Intern's file within the Division. In addition, as mentioned on pg.-4 of this Manual; the Intern is further responsible for ensuring all Institution of Education documentation is acquired and signed by the Division's Assigned Supervisor for the Intern to receive proper credit for their Internship at their Institution of Education.



## Division for the Visually Impaired

### Student Internship Policy

#### Policy 7

##### Scope

The Delaware Division for the Visually Impaired sets-forth the following policies, protocols, and procedures for the securing and assignment utilization of Student Interns.

##### Policies/Protocols/Procedures

The following policies, protocols, and procedures shall be followed and adhered to by all Administrative Program Supervisors, Unit Managers, and Program staff who are assigned a Student Intern for educational experience purposes.

Student Interns may be at the High School or College levels. For Student Interns under eighteen (18) years of age, Program staff must contact the student's High School for determining additional forms and protocols of the High School's Internship Program, and must obtain written permission for the Internship from the student's parent or guardian. The permission form may found at the end of this document in Appendix C.

##### Policy

There is a defined difference between a Student Intern and a volunteer. While both perform vital functions, with an internship, there is an obligation on the part of the organization to add to the knowledge and experience of the intern. The Intern's sole purpose is to gain practical experience and knowledge by performing duties within the organization specific to their course of study and subsequent future career goals. This is not just for the intern's benefit but also for the future benefit of the organization's industry when the intern is employed therein. With a volunteer relationship, the organization is the immediate beneficiary of the volunteer's efforts, knowledge, and experience, with the volunteer's reward being the satisfaction of providing benefit to others. This is not to say that volunteering is necessarily without educational opportunity, but such opportunity is not a requirement or the primary goal as is the case with an internship.

The following protocols for seeking a Student Intern for a specific program within the Division shall encompass:

- Upon identifying the need for a Student Intern, the Program Administrator shall complete and sign the Student Intern Justification Request Form found in Appendix A at the end of this Policy. This Form must be completed thoroughly depicting exactly how this requested internship shall benefit a portion of the Program and be conducive to the Student Intern's course of study and future career goals.

- Once completed, the Program Administrator shall forward the Student Intern Justification Request Form onto their immediate Program Manager for signature approval.
- Once signed, the Program Manager shall forward the Form onto the Division's Director or Deputy Director for final signature approval. Once this has been completed, the Director or Deputy Director shall return the Form to the originator of the request (Program Administrator).
- Once this has been completed, the Program Administrator shall scan and electronically send the fully signed scanned copy of the Form to the Division's Volunteer Services Administrator with copy to the Division's Information system support Specialist.
- Upon receipt of the scanned copy Form, the Volunteer Services Administrator shall follow the guidelines for each College or University within Delaware located in Appendix B at the end of this Policy; or, in the case of High School Student Interns; the Permission Form found in Appendix C. The Volunteer Services Administrator shall be the sole point of contact between the Division and the College(s), University(s), or High School(s) contacted.
- Once the Volunteer Services Administrator has completed the various requirements located in Appendix B at the end of this Policy; or, in the case of High School Student Interns; the Permission Form found in Appendix C, and a potential Student Intern has completed the necessary requirements on the part of their College, University, or High School, the Volunteer Services Administrator shall forward the potential Student Intern's contact information onto the Program Administrator, Program Manager, and the Division's Information System Support Specialist so all required parties have the complete documentation on the Student Intern.
- Once this has been completed, the Program Administrator shall make contact with the potential Student Intern.

The following protocols for once a Student Intern has begun their internship for a specific program within the Division shall encompass:

- The Program Administrator shall be responsible for documenting the duties carried out by the Student Intern on the Student Intern Service Documentation Form found in Appendix D at the end of this Policy.
- The Program Administrator shall submit the Weekly Student Intern Time-Sheet to the Fiscal Unit electronic mailbox for Intern stipend payments as applicable. Upon receipt, the Fiscal Administrative Officer shall print the time-sheet as documentation for payment to the Intern and then retain the hard-copy in the Fiscal Unit files. This time-sheet may be found in Appendix E at the end of this Policy.
- At the conclusion of the Student Intern's internship, the Program Administrator shall sign and date the Student Intern Service Documentation Form found in Appendix D at the end

of this Policy, scan the form, and electronically forward it onto their Program Manager, the Information System Support Specialist, and Volunteer Services Administrator so all required parties have the complete documentation on the Student Intern. In addition, the Student Intern shall be provided a signed copy of the Form for submission to their College/University/High School Counselor.

Effective Date: May 14, 2019.

**Appendix A**  
**Student Intern Justification Request Form**

## STUDENT INTERN JUSTIFICATION REQUEST FORM

The purpose of this form is to provide the organizational justification for a Student Intern. This form must be completed in detail justifying the need for a Student Intern and ensuring the Student Intern's assignment(s) within a specific Division's Program Unit shall be conducive to the student's course of study and future career goals.

Proper approval levels must be noted with signature and date prior to forwarding an electronic copy of this Justification Request Form onto the Division's Volunteer Services Administrator.

Date of Request: \_\_\_\_\_

Student Intern Reports To: \_\_\_\_\_

Projected Start/End Date of Internship: \_\_\_\_\_

Justification for Requested Student Intern:
Why is this Internship needed?
What are the specific duties the Student Intern shall be focusing on during their internship?
Please explain in detail how this Internship shall benefit the student's educational curriculum of study as well as their future career goals:

It is important to note that an Intern cannot perform Division Merit employee job functions in lieu of the Merit employee; cannot perform general administrative tasks, and must provide services under a mentoring/educational scope on behalf of the Merit employees assigned to work with the Student Intern to ensure the Student Intern receives knowledge and practical experience directly related to their educational curriculum/course of study and their future career goals.

Name/Title of Requestor: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Name/Title of Approving Program Manager: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Division Director/Deputy Director

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Appendix B**  
**College/University Student Internship Request Guidelines**



## University of Delaware

### Taken from the University's Website:

The University of Delaware Internship Program provides you with an opportunity to make a direct and positive impact on the professional development of UD Students. If you are posting a UD Winter Term Internship Program opportunity, please complete this below form.

All Winter Term Internship opportunities will be posted in Handshake, our recruiting platform. Each Winter Term internship will be posted under the account name "UD Winter Internship 2019" with your company name associated with the posting. The Career Services Center will send the designated representative from your organization a packet of applications from Students interested in your winter internship experience. The packet will include each Student's resume & any other documents that you specify in the form below.

Link to Form:

<https://docs.google.com/forms/d/e/1FAIpQLSdY6oP9MJPjPPvboCLiJL1PfiFUXPEXrpu1gpCfAMablKlNQ/viewform>

In order to post an internship opportunity, there is certain information we will need to gather to include in the posting. This includes:

- Position Title
- Company Name, Location, & Website URL
- A detailed description of what internship objective, skills needed, and job responsibilities
- The duration that the internship may take place
- Industry area
- What class years may apply
- What majors may apply
- If work authorization is required
- Who would like to receive resumes for this position
- Application Deadline

### SAMPLE INTERNSHIP POSTING

Winter Term Intern at XYZ Company

XYZ Company is a wealth management and business management firm. The firm provides accounting, financial management & tax services to high net worth individuals as well as individuals in the entertainment industry (music tours, actors, writers, directors, producers, etc.)

Position Objective: The intern will be responsible for reconciling bank accounts and assist managing the bank reconciliation workflow. The intern will also provide accounting assistance and support to our Account Managers.

Skills Needed:

Must have a basic understanding of accounting principles

Must be able to multi-task and manage competing priorities  
Excellent communication skills

Job Responsibilities:

- Record journal entries
- Reconcile bank accounts
- Reconcile brokerage accounts
- Prepare cash flow reports
- Ad-hoc reports
- Special projects

DURATION

Temporary / Seasonal (Winter)

CONTACTS

Joe Smith [jsmith@sample.email.com](mailto:jsmith@sample.email.com)

JOB FUNCTIONS

Data & Analytics

ALLOWED SCHOOL YEARS

All school years and graduation dates allowed

ALLOWED MAJORS

All Majors

If your organization does not intend to provide compensation for internships, we recommend that you familiarize yourself with the Fair Labor Standards Act as it relates to Internship Programs. Academic credit legitimizes an unpaid experience, so employers may require Students enroll in our Experiential Internship course, UNIV 364, to gain credit as part of the internship experience.

For more information on how gain credit for an internship experience, see <http://www.udel.edu/Students/career-services-center/Students/jobsearch>

If you have questions about the program, contact Ryan Fuller, Assistant Director for Employer & Alumni Engagement at [Rfuller@udel.edu](mailto:Rfuller@udel.edu) or 302-831-4765.

## **Delaware State University**

### **Taken from the University's Website:**

Students should view internships as an expected collegiate experience. More and more, organizations are expecting graduates to bring experience to the table. In order to compete at the highest level, the internship provides an opportunity for the Student to gain technical experience, as well as explore career options available. Some departments at DSU require internships through Student teaching, clinical experiences, practicums, etc. Some departments include nursing, education, movement science, social work and mass communications. However, all Students should seek internship experience.

The Office of Career Services connects Students to employers for internships in various ways. Our online Hire-a-Hornet system allows Students to post resumes and apply for openings. The Office also emails a periodic internship list and job blasts to Students to DSU email accounts. Networking events such as information sessions, lunch-and-learns, career fairs, road trips, classroom presentations and other events allow Students to market themselves and apply for internship opportunities.

Please begin by visiting [Hire-a-Hornet](#) or scheduling a meeting with Mr. Marcus Smith, Internship Administrator, at [mlsmith@desu.edu](mailto:mlsmith@desu.edu) or 302.857.6120.

## **Wilmington University**

### **Taken from the University's Website:**

Employers must register their companies using our electronic job posting system powered by Handshake at: <http://app.joinhandshake.com/>. (Note: University was contacted to verify this registration included Internships).

## **Delaware Technical Community College**

College was contacted as the Internship process was not clear on their Website. The process begins with the Career Services Center. Once contact has been established, all employer forms for the placement of a Student Intern shall be initiated.

Career Service Center Contact: Marie Mayhal [mmayhal1@dtcc.edu](mailto:mmayhal1@dtcc.edu)

## **Goldey-Beacom College**

College was contacted and the following personnel were provided for the Internship process:

Jessica Fehnel, Academic Affairs Administrator [fehnel@gbc.edu](mailto:fehnel@gbc.edu)

Elizabeth Kirker, Career Services Administrator [kirkere@gbc.edu](mailto:kirkere@gbc.edu)

## **Appendix C**

**High School (Minor) Student Intern Permission Form**

**Form Previously Approved by DAG June, 2017**

Delaware Department of Health and Social Services, Division for the Visually Impaired

Statement of Permission to Participate in the Student Internship Program

and Liability Waiver

I \_\_\_\_\_, am the (Check One) \_\_\_\_\_ Parent \_\_\_\_\_ Legal Guardian of \_\_\_\_\_ ("Participant"), and by signing below, acting on behalf of myself and Participant, hereby:

1. Grant permission for Participant to participate in the Student Internship Program through the Department of Health and Social Services Division for the Visually Impaired ("DVI"). I understand that the Student Internship Program will involve working within the assigned Program(s) through DVI and that such training may involve certain risks, which are expressly assumed.
2. Waive any claim that I or Participant may have against the State of Delaware and DVI, including their respective employees, representative and agents, arising out of any injury to Participant suffered in connection with participation in this program. I acknowledge that the grant of such waiver is intended to supplement and in no way limit or diminish any liability protection afforded to the State and DVI (including sovereign immunity) under applicable law.
3. Authorize DVI staff, representative and agents, if deemed necessary or appropriate, to (a) administer minor first aid to Participant, call for emergency medical treatment, or provide emergency transportation.

Parent / Legal Guardian Signature:

\_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_



**Appendix D**  
**Student Intern Service Documentation**



The purpose of this form is to provide assessment from an educational and practical experience standpoint regarding the staff member the Student Intern served under, the Program Administrator, and the Student Intern. This form must be completed in detail and signed by all parties stated below. Once completed, a signed copy of this form shall be provided to the Student Intern to submit to their College/University Counselor.

Division Unit Student Intern Assigned To: \_\_\_\_\_

Student Intern's Supervisor: \_\_\_\_\_

Start/End Date of Internship: \_\_\_\_\_

Describe the duties the Student Intern performed during their Internship:
What educational aspects did the Student Intern gain for their experience which correlated with their current course of study?
What practical field experience did the Student Intern gain as to providing them with working in their course of study in the future?

Name/Title Of Supervising Staff Member: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name/Title of Program Administrator: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name of Student Intern: \_\_\_\_\_

College/University/High School: \_\_\_\_\_

Student Intern Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Appendix E**  
**Student Intern Time Sheet**

Student Intern Time Sheet

Student Name \_\_\_\_\_

High School or College \_\_\_\_\_

Division Program Assigned To \_\_\_\_\_

Location of Assignment \_\_\_\_\_

Division Supervisor \_\_\_\_\_

Student Intern: Please fill-in your hours and remit to your Division Supervisor at the conclusion of your Student Internship.

<u>Date</u>	<u>Time In</u>	<u>Time Out</u>	<u>Hours</u>


Total Student Internship Hours \_\_\_\_\_

\_\_\_\_\_  
Student Intern Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Division Supervisor Signature

\_\_\_\_\_  
Date

# COVID-19 Acknowledgement and Disclosure Form

The safety of our consumers, employees, volunteers and visitors is a priority. In order to reduce the spread of COVID-19 while providing critical services to our community, safety precautions must be followed. Prior to participating in any in-person meetings or services, individuals are asked to acknowledge and agree to the following guidelines.

- I will monitor my health prior to each scheduled appointment and reschedule if I, or a member of my household, has:
  - Been near (within 6 feet for at least 5 minutes) a person who has a lab-confirmed case of COVID-19 or have had direct contact with their mucus or saliva in the past 14 days
  - A fever of 100.5 degrees F or above (or symptoms like alternating shivering and sweating)
  - A new cough
  - New trouble breathing, shortness of breath or sever wheezing
  - New chills
  - New muscle aches
  - A sore throat
  - Diarrhea
  - New loss of smell or taste, or a change in taste
- I will maintain social distancing of at least 6 feet unless the nature of the service requires close contact.
- I will wear a face covering for the duration of the appointment. If I am unable to wear a face covering for a documented health reason, I will inform my DVI point of contact to discuss service delivery options.
- I will follow Centers for Disease Control and Prevention ([CDC](https://www.cdc.gov)) safety recommendations until COVID-19 restrictions are lifted.
- I will discuss any questions or concerns with my DVI point of contact prior to the appointment.

I understand that if I refuse to wear a face covering, I will be asked to reschedule the appointment at a later time when I am willing to comply with safety standards. If I do not have a face covering, one will be provided to me.

I understand that services may be prioritized in order to minimize risk of exposure to all parties.

I understand DVI employees are completing a daily health check, following DPH and CDC safety guidelines, and adhering to department and agency policies and procedures in order to maintain safe working environments for everyone.

---

Consumer/volunteer/visitor signature

---

Date

---

Parent/Guardian

---

Date

## Division for the Visually Impaired

### Maintaining Operations During the Covid-19 Pandemic

**Policy:** DVI will provide services to Delawareans with visual impairments during the pandemic while practicing proper social distancing techniques and [Centers for Disease Control \(CDC\) recommended precautions](#) to prevent person to person exposure.

**Purpose:** To ensure the health and safety of all staff and participants as well as, maintain compliance to all applicable federal and state policies and procedures.

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**Reviewed:** May 14, 2020

**Revised:** May 14, 2020, June 30, 2020

## **DVI Management Guidelines and Responsibilities**

1. Use the [DHSS Checklist](#) to ensure the needs of their employees and consumers have been addressed.
2. Clearly communicate the division policy, promote remote work as often as operational needs and resources allow, and set very clear employee expectations.
3. Provide consumers with operational information and visitation guidelines.
4. Ensure employees adhere to the guidelines outlined by DVI. Further guidance can be found in the [DHSS Reopening Memo](#).
5. Continue to encourage employees to work remotely whenever possible.
6. Assure employees understand that all DVI programs will remain open for appointment-only face-to-face services (in DVI offices or community locations) and virtual services unless otherwise directed by the Secretary of the Department of Health and Social Services (DHSS).
7. Ensure that employees adhere to the protocols listed below and sign the **Covid-19 Pandemic Policy** form.
8. Work with fellow leadership to ensure employees are covering phones and mail.
9. Create and maintain rotating office coverage which includes all staff. Be sure to identify those who are working remotely and update in response to staff who are on leave. Save schedules in the [Covid-19 folder on the shared drive](#).
10. Develop program specific task list to assure services are being delivered remotely. Lists will include:
  - a. All staff are expected to maintain regular consumer contact.
  - b. DVI staff will act as a conduit between consumers and community resources.
  - c. DVI employees will document efforts to assist consumers with isolation and support.
  - d. Managers will work together to develop consumer surveys to assess satisfaction and needs of consumers.
11. Bi-weekly reports – Program managers will continue to submit reports every other week that include virtual solutions, innovative service delivery, COVID-19 impact on consumers, successes (i.e. unemployment assistance, workshops delivered, etc.), new barriers and possible solutions, etc.

## **DVI Employee Office Guidelines and Responsibilities**

### **Daily Health Check**

1. All DVI employees will perform a [daily health check](#) before reporting to the office.
2. Those who are feeling ill or have a fever over 100.5 degrees will not report to the office.
3. Employees must follow agency policy in reporting any absence and using applicable leave time.
4. Volunteer considerations:
  - a. The Volunteer Coordinator will request each volunteer complete a COVID-19 Acknowledgment and Disclosure Form in order to be approved to volunteer. A signed copy must be kept on file (electronic signatures are encouraged).
  - b. Volunteers are to inform the Volunteer Coordinator if unable to report to office.
  - c. Any volunteers who are unable to wear face coverings for medical reasons may be asked to postpone volunteering. If the IMRC Supervisor, Volunteer Coordinator and the volunteer agree to safety procedures and work can be done in an isolated space while also following all other safety precautions, it is acceptable to have the volunteer on-site.

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- d. The Volunteer Coordinator will be responsible for documenting and carrying out the safety procedures (i.e. wipe down all surfaces in the volunteer's space prior to them entering and after leaving, ensure hand sanitizer is available, wash hands regularly, etc.)

## **Social Distancing**

Maintain social distancing of at least 6 feet in all areas of state buildings including:

1. Avoid congregating in high traffic or common areas that do not allow six feet of separation for others to pass by safely.
2. Adhere to posted signs, tape marks, and reduced occupancy standards in common areas as implemented by the agency to allow for social distancing.
3. Hold large group meetings via teleconference or video conferencing whenever possible.
4. When in-person meetings are required, limit the number of participants to ensure that the requirement of six feet of physical distancing is maintained.

## **Face Masks/Coverings**

Employees will follow all applicable guidance and wear face masks/coverings when in all buildings, including government buildings, consumer homes, private businesses, or in any situation **when social distancing is not possible**.

1. Must wear face covering in all common areas including entries, hallways, restrooms, and breakrooms.
2. May use own face covering or wear one that has been provided by the agency.
3. The face covering must fully cover the mouth/nose area.
4. Face covering may not have offensive or inappropriate writing or graphics. Management reserves the right to ask employees to replace their face covering if it is deemed inappropriate, unprofessional or unsafe.
5. When working at desks in offices or cubicles, face masks may be removed until entering common areas.
6. Employees who are unable to wear a face covering for medical reasons, must contact HR for an ADA accommodation request.

## **General Protocols**

All employees will adhere to the following general protocols:

1. Complete COVID-19 review and agree to safety requirements on the DE Learning Center (DLC).
2. Utilize modified schedules such as partial workdays, alternate work schedules, or staggered hours that allow employees to work on-site on a rotational basis, when possible and per supervisory approval.
3. Be responsible for cleaning and disinfecting surfaces in personal workspace.
4. Follow all safety requirements implemented by DVI as required by job duties and responsibilities.
5. Notify supervisor of any travel to/from other states and countries, and follow the latest quarantine recommendations from the [CDC](#) as related to travel to/from restricted areas.
6. Adhere to agency guidelines based on [CDC](#) recommendations regarding the scheduled cleaning and disinfection of surfaces.
7. Notify supervisor and your doctor if you exhibit any symptoms or have been in contact with someone who has tested positive for COVID-19. Do not report to work.
8. Practice frequent handwashing and use hand sanitizer to decrease the spread of COVID-19.
9. Ensure DVI visitors are provided with guidelines that employees are following as outlined below.
10. Discuss all concerns with supervisors.



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## **DVI Employee Service-Related Guidelines and Responsibilities**

DVI employees provide services in a variety of ways and locations. In order to minimize risks, staff will follow the guidelines as outlined below and address issues or concerns with supervisors. Staff will document that consumers have been informed of and understand the safety guidelines staff and consumers must follow prior to each scheduled appointment.

### **Providing Face-to-Face Services at DVI Offices**

When providing services at **DVI offices**, employees will:

1. Schedule and confirm appointments with participants.
2. Request the consumer complete a COVID-19 Acknowledgment and Disclosure Form prior to the appointment. Keep a copy of the signed form on file and document in VICR. To ensure timely services are provided, electronic signatures are encouraged.
3. Inform consumers that they will be asked, upon arrival, to attest that they took their temperature and have no other identified symptoms.
4. If participant does not have a thermometer or asks for assistance, DVI staff (with whom the scheduled appointment is with) will take their temperature when they arrive at the office, provided they do not have any other identified symptoms.
5. When possible, the consumer and employee will conduct services practicing all protocols identified above (face covering, social distancing, hand washing, etc.).
6. When services require staff to provide assistance within six feet of the consumer, both will wear masks, gloves, practice frequent handwashing, use hand sanitizer and frequently sanitize surfaces and equipment.

### **Providing Face-to-Face Services in Consumer Homes**

When providing services in **consumer homes**, employee will:

1. Schedule and confirm appointments with participants.
2. Request the consumer complete a COVID-19 Acknowledgment and Disclosure Form prior to the appointment. Keep a copy of the signed form(s) on file and document in VICR. To ensure timely services are provided, electronic signatures are encouraged.
3. Inform consumers that they will be asked to attest that they took their temperature and have no other identified symptoms.
4. If participant does not have a thermometer or asks for assistance, DVI staff will take their temperature when they arrive, provided the consumer does not have any other identified symptoms.
5. When possible, the consumer and employee will conduct services practicing all protocols identified above (face covering, social distancing, hand washing, etc.).
6. When services require staff to provide assistance within six feet of the consumer, both will wear masks, practice frequent handwashing, use hand sanitizer and frequently sanitize surfaces and equipment.

### **Providing Face-to-Face Services in the Community (indoors or outside)**

When providing services at **schools, assisted living facilities, nursing homes, or other community locations**, employees will:

1. Schedule and confirm appointments with participants.
2. Request the consumer complete a COVID-19 Acknowledgment and Disclosure Form prior to the appointment. Keep a copy of the signed form on file and document in VICR. To ensure timely services are provided, electronic signatures are encouraged.
3. Follow the protocols established by the organization, the Governor and the [CDC recommended precautions](#) to avoid community spread including, the use of facial coverings ([see guidance by DHR](#)).

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4. Inform consumers that they will be asked to attest that they took their temperature and have no other identified symptoms.
5. If participant does not have a thermometer or asks for assistance, DVI staff will take their temperature when they arrive, provided the consumer does not have any other identified symptoms.
6. When possible, the consumer and employee will conduct services practicing all protocols identified above (mask, social distance, hand washing, etc.).
7. When services require staff to provide assistance within six feet of the consumer, both will wear masks, gloves, practice frequent handwashing, use hand sanitizer and frequently sanitize surfaces and equipment.

## **Visitor Guidelines**

Staff will ensure visitors are aware of the following protocols:

1. Visitors are to have scheduled appointments and be informed that they are expected to complete a COVID-19 Acknowledgement and Disclosure Form (see additional details below).
2. Visitors are to enter through door #3 (front desk area) and be greeted by the person with whom they have a scheduled appointment and have them sign in/out.
3. Visitors are signed in and attest that they have completed a [daily health check](#) and have no fever or symptoms.
4. Visitors will maintain social distancing of at least 6 feet in all areas of state buildings.
  - a. Adhere to posted signs, tape marks, and reduced occupancy standards as implemented by the agency to allow for social distancing.
5. Wear face masks/coverings when in state buildings.
  - a. If an individual does not have a face mask, one will be provided to them.
  - b. If an individual refuses to wear a face mask, they may be asked to leave the office after a supervisor is consulted. They can return to the office at a later time when they are willing to comply with safety standards.

## **DVI Facilities Safety Protocols**

1. Employee desks will be more than six feet apart and separated by walls, cubicle partitions, or some type of physical separator. Staff who share offices will either be moved to unshared areas for work or will have alternating schedules.
2. Signs will be posted throughout buildings as a reminder to employees and visitors of safety and hygiene requirements.
3. Extra chairs will be removed from common areas such as lobbies, conference rooms, break/lunchrooms, etc. to allow maintenance of social distancing.
4. Common areas (copy machines, doorways, etc.) will be properly marked to assure proper social distancing.
5. Staff will sanitize meeting areas and office equipment before and after their use.
6. Guidance will be placed at all entryways, so visitors understand the guidelines of operation.
7. Hand sanitizer, masks and cleaning products will be available throughout the office and for use in state vehicles. Staff will monitor supplies and notify supervisor if supplies are running low. Staff will not take supplies for personal use outside of work requirements.
8. Wipes used in state vehicles will be returned to the office to avoid drying out in the warm weather

## **DVI Telework Guidelines**

**Telework** – Employees who are capable of working remotely will discuss with their supervisor, complete the [Telework Assessment](#), and sign the [Telework agreement](#).

**Approved:** April 8, 2020

**Reviewed:** May 14, 2020

**Revised:** May 14, 2020, June 30, 2020

1. **Telework supervision** – Supervisors will meet with all employees at least weekly to discuss caseloads, work performed, and work planned.
2. **Telework tracking** – Staff working off-site will complete a summary of work performed and review with their supervisor. [Telework tracking templates](#) can be found in the [Covid-19 folder on the shared drive](#) and may be customized to meet program needs.
3. **Essential tools and equipment** – Managers will perform ongoing assessments to assure staff have the equipment they need to properly perform their jobs from remote locations. Examples include state issued hardware, phones, VPN access and Skype.
4. **Meeting with consumers** – all staff are to offer consumers three options to conduct meetings:
  - a. Telephone
  - b. Videoconference
  - c. Face to face – if consumers wish to meet at a DVI office location, staff will secure a room that is large enough to provide six feet of space between all attendees.

## **Additional Guidelines and Responsibilities**

### **Infected Employees**

The Division of Public Health will contact every person testing positive for COVID-19 to provide guidance on isolation and other steps. One manager/supervisor from a work location may contact the call center to get guidance for close contacts of the individual testing positive. The Division of Public Health does not routinely contact the employer of persons testing positive and will do so only in high-risk situations such as long-term care facilities.

Managers of employees who test positive will contact the Covid-19 resource line (211) to receive guidance. Managers should also inform IRM because their jobs require them to frequently move in and out of various offices. The person(s) work area will be thoroughly cleaned by following the directions below. Agencies with questions about cleaning after an employee tests positive for COVID-19, can email [HSPContact@delaware.gov](mailto:HSPContact@delaware.gov).

1. Leave space untouched for 24 hours.
2. After 24 hours, clean the workspace with disinfectant products. Be sure to wipe all surface areas. If the workspace is a cubicle or in an open area, be sure to follow the same process with adjoining spaces.

### **Family Members Undergoing Testing**

Employees will discuss concerns with their managers when family members are undergoing Covid-19 testing. Unless otherwise directed, employees will follow their regular remote or office schedule. Employees will work from home if that is a viable option. Those who are not able to work from home, will practice social distancing and general precautions. Individuals who are concerned that they have been exposed to a person infected with COVID-19 should monitor their health; they should call their healthcare provider right away if they develop symptoms suggestive of COVID-19. (e.g., fever, cough, shortness of breath, sore throat, muscle fatigue, or digestive symptoms such as vomiting, diarrhea, abdominal pain or lack of appetite).

### **Employees Fearful of Working in DVI Offices or Providing Face-to-Face Services**

Managers who have staff(s) who are afraid to come to work should contact the DVI Director or Deputy Director to discuss. In addition, DPH and DHR can be a resource and provide guidance for managers as well as employees.

**Approved:** April 8, 2020

**Reviewed:** May 14, 2020

**Revised:** May 14, 2020, June 30, 2020

### **Paid Emergency Leave (PEL)**

PEL has been established by DHSS for all employees who qualify. This benefit continues to evolve so staff should understand that it may not be sustainable and requires prior approval.

### **Contact Tracing**

Public health staff work with an individual who has a positive test for COVID-19 to help them recall everyone with whom they have had close contact during the timeframe while they may have been infectious. [Click here](#) to learn more about contact tracing from the Centers for Disease Control and Prevention (CDC). The State of Delaware and the nonpartisan research institution [NORC at the University of Chicago](#) are working together to build Delaware's statewide contact tracing program, adding as many as 200 contact tracers. In the meantime, members of the Delaware National Guard have been trained and are supplementing the work being done by the Division of Public Health.

**Approved:** April 8, 2020  
**Reviewed:** May 14, 2020  
**Revised:** May 14, 2020, June 30, 2020

## Policy Approval

Click or tap here to enter text.

**Name**

Click or tap here to enter text.

**Title**

Click or tap here to enter text.

**Signature**

## Employee Acceptance

My signature indicates that I have read the policy and have had a chance to ask questions. I agree to abide by the terms of the policy and seek additional assistance when needed.

Click or tap here to enter text.

**Name**

Click or tap here to enter text.

**Title**

Click or tap here to enter text.

**Signature**

## Resources

The following resources are available to staff and leadership:

- Delaware Department of Human Resources Coronavirus FAQs - <https://dhr.delaware.gov/covid19/>
- DPH Coronavirus - <https://coronavirus.delaware.gov/>
- CDC Resources for Business & Employers - <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html>
- Occupational Safety and Health Administration - <https://www.osha.gov/>

## Documents

<a href="#">Telework tracking template</a> <a href="#">Telework Assessment</a> <a href="#">Telework agreement</a> <a href="#">FAQ: Delaware Contact Tracing (6.24.20)</a> <a href="#">FAQ: Delaware Contact Tracing (Spanish Translation) (6.25.20)</a> <a href="#">Secretary Meetings\DHSS Reopening Checklist.docx</a> <a href="#">Secretary Meetings\DHSS Reopening Guidance Memo (draft2).docx</a> <a href="#">Secretary Meetings\Returning to the Workplace Guidance for Management - 06052020 Final.pdf</a> <a href="#">COVID-19 Acknowledgment and Disclosure Form</a>
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## Trauma Informed Care Policies and Procedures

### Background:

The purpose of this policy is to provide awareness and be mindful of the traumatic experiences in the lives of consumers, colleagues, and other internal and external customers that staff interact with on a daily basis so as to promote the understanding of trauma and its impact, ensure the development of a trauma informed system, and provide the resources of trauma specific services external to the Division for all populations served. Trauma is defined as an impact on a life resulting from an event, series of events, or set of circumstances that is experienced by an individual as physically or emotionally harmful or threatening and that has lasting adverse effects on the individual's functioning and affects the individual's physical, social, emotional, or spiritual well-being.

### Scope:

While the Division for the Visually Impaired does not oversee patient consumer care through mediums such as hospitals, long-term care or nursing home facilities, in-home care, or any other such direct-service type of similar settings; DVI does serve a unique population; that being, the visually impaired and blind communities throughout Delaware. These services encompass children from birth through adulthood with programs offered through the Division's Education Unit and Teachers for the Visually Impaired; Orientation and Mobility; Vocational Rehabilitation Unit; Independent Living Skills Unit; Technology Center; Material's Center; and Business Enterprise Program. It is important to understand that while the blind and visually impaired populations function just as any one does in society; trauma impacting this population could encompass a more in-depth range of unique factors such as childhood abuse or dysfunctionality due to their vision loss; the loss of vision itself; educational and/or employment barriers; transportation or general navigation barriers; or other daily living functions that those with sight might often take for granted. Therefore, it is essential that the Division for the Visually Impaired ensures Trauma Informed Care is practiced at the assessment of services level to establish the services and plans going forward and ensure that these services and plans shall encompass the best effectiveness for the consumer to attain and maintain their desired goals and outcomes.

### Methodologies:

While the Division for the Visually Impaired staff are not in the capacity of providing care related to trauma to consumers and other internal and external customers, staff shall become familiar with Adverse Childhood Experiences and the Adverse Childhood Experiences (ACE) Standards of Practice questionnaire (See Attachment A) in order to become more trauma sensitive and ascertain from speaking with the consumer what additional services may be needed; whether internal or external to the Division; to aid the consumer in attaining and maintaining their goals and objectives.

Training:

On October 17, 2018, the Honorable Governor John C. Carney signed into law Executive Order 24 stipulating Delaware a trauma-informed state. Through this enactment, each Cabinet Secretary was charged with adopting trauma informed protocols and methodologies within and throughout each Division or Section of their respective Departments. Delaware Health and Social Services offers several training and seminar sessions on this subject through the Division of Substance Abuse and Mental Health. In addition, it is imperative that each Program Manager within the Division provide training to all staff members within their respective Units at staff meetings on the ACE questionnaire and ensure the practice of Informed Trauma Care is a standard operating procedure within the Division, and that it is done so with compassion, understanding, professionalism, respect, and confidentiality for each consumer served.

Delaware Health and Social Services, Division for the Visually Impaired

Attachment A

Ace Standards of Practice for Trauma Informa Care



ACE Standards of Practice for Trauma Informed Care

While you were growing up, during your first 18 years of life:
1. Did a parent or other adult in the household often ...
Swear at you, insult you, put you down, or humiliate you?
or
Act in a way that made you afraid that you might be physically hurt?
Yes No If yes enter 1 _____
XX
2. Did a parent or other adult in the household often ...
Push, grab, slap, or throw something at you?
or
Ever hit you so hard that you had marks or were injured?
Yes No If yes enter 1 _____
XX
3. Did an adult or person at least 5 years older than you ever...
Touch or fondle you or have you touch their body in a sexual way?
or
Try to or actually have oral, anal, or vaginal sex with you?
Yes No If yes enter 1 _____
XX
4. Did you often feel that ...
No one in your family loved you or thought you were important or special?
or
Your family didn't look out for each other, feel close to each other, or support each other?
Yes No If yes enter 1 _____

## Delaware Health and Social Services, Division for the Visually Impaired

5. Did you often feel that ...
You didn't have enough to eat, had to wear dirty clothes, and had no one to protect you?
or
Your parents were too drunk or high to take care of you or take you to the doctor if you needed it?
Yes No If yes enter 1 _____
XX
6. Were your parents ever separated or divorced?
Yes No If yes enter 1 _____
XX
7. Was your mother or stepmother:
Often pushed, grabbed, slapped, or had something thrown at her?
or
Sometimes or often kicked, bitten, hit with a fist, or hit with something hard?
or
Ever repeatedly hit over at least a few minutes or threatened with a gun or knife?
Yes No If yes enter 1 _____
XX
8. Did you live with anyone who was a problem drinker or alcoholic or who used street drugs?
Yes No If yes enter 1 _____
XX
9. Was a household member depressed or mentally ill or did a household member attempt suicide?
Yes No If yes enter 1 _____
XX
10. Did a household member go to prison?
Yes No If yes enter 1 _____
Now add up your "Yes" answers: _____ This is your ACE Score

## DVI HOLDOVER 2021 Appendix E

### **2020 JLOSC Recommendations PROGRESS REPORT Division for the Visually Impaired**

These recommendations are intended to address the matters identified in both the 2019 JLOSC Final Report and the 2020 Final Report of the JLOSC Task Force on DVI. DVI shall refer to these reports as guidance in meeting these recommendations. Recommendation 2 requires general statutory updates and technical corrections which will be drafted by the Committee's legislative attorney and is not included in progress reporting. Recommendation 3 requires collaboration between DVI and JLOSC staff for additional statutory updates and is included in progress reporting for this reason.

*The DVI Director and Deputy Director were appointed to our roles in February 2020; just a few days after our last JLOSC hearing. Roughly two weeks later, the Delaware economy closed to slow the spread of the Covid-19 virus and we began coordinating remote access so employees could work from home while simultaneously reinventing the way in which services were provided.*

#### **Recommendation 3: Additional Statutory Updates**

The review process has highlighted several areas of the Delaware Code relating to DVI that will require amendments beyond technical corrections. It was also identified that many of these sections have not been amended in at least 9 years, for some sections it has been much longer.

DVI shall work with JLOSC staff in developing legislation to address the areas of concern identified during the JLOSC review of DVI. These areas include, DVI's governing statute, Chapter 79, Title 29; Chapters 21 and 23, Title 31; braille literacy rights and education in Chapter 2, Title 14, State appropriations in Chapter 17, Title 14, and BEP provisions under the State pension plan in Chapter 55, Title 29 and Statewide contracts under Chapter 96, Title 16.

#### **July 31, 2020 Progress Update:**

House Bill 301 was passed and signed by the Governor. DVI will work with the committee to develop additional required legislation for the 2021 General Assembly session

#### **December 1, 2020 Progress Update:**

N/A

#### **Recommendation 4: Analysis of Agency Structure – Staff and Funding**

DVI shall review and identify necessary changes across all program units dealing with staff levels and positions focusing on funding structures and development opportunities. DVI may consider consulting with other State agencies such as the Department of Human Resources for assistance.

#### **July 31, 2020 Progress Update:**

DVI is currently reviewing agency structure, staff and funding levels. As a result, the DVI Vocational Rehabilitation program is in the process of hiring for two positions which have been repurposed to focus on areas in need of development. One position will be dedicated to the coordination and provision of Pre-Employment Training Services (Pre-ETS) for transition youth. The second position will be a person working in a hybrid role that includes more targeted career development for both transition students and adults.

DVI is part of the Equitable Infrastructure Committee, a sub-committee of the Special Education Strategic Plan Advisory Council (SESPAC), which developed a proposed plan for creating equitable education services and funding across the state for students served through Autism Spectrum Disorder, Deaf, Hard of Hearing, Deaf-Blind, and Visual Impairment programs. Please see attached PowerPoint presentation describing the background, purpose and recommended plan which is now being discussed with stakeholders to get feedback and suggestions.

In addition, DVI recently developed a position to provide more AT support, technical assistance and training to students and district personnel. This position was filled in early 2020 and has not been fully implemented due to the pandemic. However, the Trainer/Educator has been collaborating with the Education and Vocational Rehabilitation staff to provide remote summer programming, supporting students with remote learning, repairing Brailers so they can be used by students, and familiarizing herself with new equipment.

#### **December 1, 2020 Progress Update:**

As mentioned in the July update, we are repurposing two positions in the VR program to align with requirements in the Workforce Innovation Opportunity Act (WIOA) and respond to the needs of our dual customers - job seekers and employers. We are pleased to report that after several attempts to fill the Pre-Employment Transition Coordinator position, we have someone starting in December. The Career Development position remains vacant after several job postings and interviews, so we are brainstorming new ways to recruit for this position.

We are also happy to provide an update on the Trainer/Educator II (TE II) position for students. The services provided are individualized based on student needs, but this position was designed to offer a broader array of services including assessment and evaluation, researching options, making recommendations, training, referral and troubleshooting primarily for transition aged students. Although the pandemic has impacted how DVI provides these services, creative solutions have been implemented to ensure students and families continue to receive the services necessary. With proper safety protocols in place, some students and families are agreeable to in-person services. When that is not possible, the TE II is able to deliver trial equipment for use until a formal evaluation can be completed, offer remote training and recommend online resources for additional training videos and webinars.

The TE II maintains regular communication with students and families to keep them engaged during this unique time of remote learning. In addition, the TE II has been offering remote training to school personnel with plans to provide more in-person training to school staff once restrictions are lifted.

DVI continues to participate in the Equitable Infrastructure Committee, a sub-committee of the Special Education Strategic Plan Advisory Council (SESPAC) which continues to present the proposal to stakeholders for a statewide entity for students served through Autism Spectrum Disorder, Deaf, Hard of

Hearing, Deaf-Blind, and Visual Impairment programs. This is receiving a tremendous amount of support.

In addition to the above updates, we have made a few other changes internally, including changes to the central intake process and increasing support to the Education Program. In response to the pandemic and to address the need for some employees to work remotely, the central intake process was split among 3 staff who work as a team to ensure timely processing of referrals. Prior to COVID, central intake was going to remain the responsibility of one person, however, we have seen many benefits of the team approach and plan to revise policies and procedures to reflect this. We have also designated additional support to the Education and Orientation & Mobility Programs given the size of the programs and coordination required. By offering more administrative support, this frees up the Teachers of the Visually Impaired and Certified Orientation & Mobility Specialists to provide direct services, especially important now in this virtual learning environment.

As the only agency in Delaware responsible for providing comprehensive services to individuals who are visually impaired or blind, DVI has historically focused on serving the individual. The structure of our agency reflects this with most of our positions requiring highly specialized, technical skills. However, in order to truly provide comprehensive services, DVI must be a resource to more than just the individual directly impacted by vision loss; we recognize that our services have a much greater impact when we serve the community at large. In order to enhance our capacity to provide comprehensive, high quality services, DVI has begun an organizational development initiative to evaluate our agency structure, identify needs and develop comprehensive training and communication plans. Our Training and Communications Director, who started in August 2020, is assisting the DVI Leadership Team with aligning our goals and priorities with the DHSS Strategic Plan in order to better identify potential structural and funding needs for the agency.

Below is a draft outline of immediate objectives:

1. Leadership Training (Oct.) – DiSC Behavior Styles – Awareness of self and others. Applicable to teambuilding, improved communications and respect for differences.
  - a. Preparation (of Leadership) for November Planning Meetings
2. Addressing Organizational Development needs through structured planning (Nov.) with outcomes that include aligning DVI goals & objectives with DHSS Strategic Goals, creating a Training Plan and Communications Plan
  - a. Developing a New Employee Orientation program
  - b. Developing an Individual Development Plan (IDP) for staff (to align expectations with manager and demonstrate action to improve knowledge, skills & abilities)
  - c. Developing a multi-approach Training Needs Assessment

Although the organizational development initiative has already proceeded quickly with the hiring of a Training and Communications Director, it is a longer-term project that requires careful planning and collaboration both internally and externally. We are optimistic about the changes occurring within the Department of Health and Social Services and the additional focus being placed on divisions that serve special populations. With plans to explore options for sharing resources and enhancing collaborations, we are able to use our organizational development plan to identify needs and align our division with the goals of the Department. Our training and communication plans will support our internal needs as well as support the broader efforts of our Department so we can build a strong foundation that will pivot easily to respond to changing needs.

### **Ongoing Plan and/or Implementation**

DVI is just starting the organizational development initiative so further planning is needed. However, critical areas related to our structure and funding will be considered as we progress with this initiative and consult with the department.

#### **Recommendation 5: Agency Staff – Training**

DVI shall review and identify current training needs of its staff and implement appropriate training. DVI may consider participating in Mandt System® training for employees working outside of the office. DVI may also consider conducting a survey of their employees to solicit feedback and consulting with the State Department of Human Resources for assistance in scheduling and availability of training courses available in the Delaware Learning Center.

#### **July 31, 2020 Progress Update:**

Although Mandt System® is a very good training, it is also very expensive. DVI is in the process of contracting with national experts, formerly Rehabilitation Services Administration staff, which will allow for more focused fiscal training related to federal reporting and policy development. The Vocational Rehabilitation (VR) program is working with the VR Development Group to explore VR specific training and the possibility of purchasing a Learning Management System specific to foundational VR and disability related professional development. In addition, DVI is hiring a Training Coordinator who has a tremendous amount of experience and education related to training and communications (anticipate a start date in August 2020). The Training Coordinator will conduct a training needs assessment and create a comprehensive training plan for all staff.

In order to use tools that are available to all state employees, DVI is also exploring the option of obtaining a license for the Delaware Learning Center (DLC) which would allow the agency to develop and conduct online training specific to the needs of DVI staff. Along the same lines, we have begun working with the statewide training program to conduct the DiSC assessment for the agency with an emphasis on the leadership team.

#### **December 1, 2020 Progress Update:**

In August, DVI started working with consultants who are national experts on the VR program, Dr. Fred Schroeder and Seymour Levy (former Rehabilitation Services Administration Commissioner and fiscal staff). They have provided us with helpful interpretations of the Federal regulations, assisted with identifying new procedures that comply with the regulations, and reviewed and revised policies and procedures to reflect the required changes. Although much of this work was done specifically around federal reporting and training took place with the select DVI staff responsible, we are working with Dr. Schroeder and Mr. Levy to develop a more comprehensive training for all fiscal and VR staff. The training will include an overview of key areas of the federal regulations, information on the new federal reporting requirements for FFY21, policies and procedures, internal controls, obligation date and period of performance.

The DVI VR Program has acquired a Learning Management System (LMS) to enhance staff development. The system is hosted by the VR Development Group and currently has 65 courses available. The DVI VR LMS has the scalability to add personalized programmatic training to further promote effective case management and successful closure strategies. This system is already being utilized with new VR staff

and will be incorporated into the larger training plan for DVI. Given the role the other program staff play with assisting individuals prepare for and obtain employment, it is important for them to be cross trained and understand how they contribute to and best support the VR process.

DVI is also working with Ashley Kavanagh at Statewide Training to receive guidance on how to utilize more of the Delaware Learning Center for our division's purpose. Although we anticipated paying a fee to access more of the system, we have learned that more features are available at no additional cost. Ashley will provide training to key DVI personnel in order for the DLC to be used more effectively for training.

Finally, we are fortunate to have hired a Training and Communications Director who has prior experience working as a Training Administrator with the DE Dept. of Labor. Given her background in organizational development, training and communications, she is well suited to assist DVI with developing an agency-wide training plan, as well as work with individual programs to address their specific needs. Although DVI is a relatively small division, having several programs with specific training needs creates challenges. However, having someone who is able to streamline training to meet program specific needs as well as incorporate them into the larger agency plan will assist us beyond just training; this will help to inform our recruitment and retention efforts and address succession planning.

Although we had initially intended to work with Statewide Training to provide the DiSC Assessment for the leadership team, our Training and Communications Director has extensive experience with DiSC. She was able to provide the training as a kick-off to our organizational development initiative and will continue to incorporate what we learned in future planning and leadership meetings. In addition, she will be working with each program administrator to provide the training for all staff.

### **Ongoing Plan and/or Implementation**

To provide more information regarding our overall agency plan which includes training, please see the 3 attachments ***DVI TrngOrgDev Summary, DVI Training Project Matrix, and DVI Strat Goal Matrix***. These documents outline our priorities as an agency and specifically related to training. Although they are still in development, the Training Project and Strategic Goal Matrix documents provide us with our key deliverables, measures of success, responsible parties and a timeframe to follow. We have several large priorities and plenty of ongoing work to do, but our ability to achieve our goals and sustain the work is greater when we are thoughtful about our planning, solicit input from staff and stakeholders, and can demonstrate we are making progress on the goals. This is a long-term project that will likely need to be changed and adjusted periodically.

### **Recommendation 6: Agency Staff – Policy and Procedure Manual**

DVI shall create and implement an internal manual with policies and procedures that will enhance staff communications, recruitment, onboarding, and retention procedures.

### **July 31, 2020 Progress Update:**

DVI has been reviewing its Policies and Procedures and researching other states with similar agencies in order to develop a comprehensive manual. We will also work with DHR to utilize resources that are available and applicable to DVI.

Additionally, as there is a national shortage of both Teachers for the Visually Impaired and Orientation & Mobility Specialists, DVI is researching the practices of other agencies that serve the blind/visually impaired for more strategic targeting of recruitment candidates.

#### **December 1, 2020 Progress Update:**

DVI collected State and Department policies from the Division of Human Resources (DHR) and the Department of Health and Social Services (DHSS) to ensure the staff had quick access when they were needed and for reference as new Division policies were created.

After reviewing the current DVI policies and procedures, gaps were identified work began on a new Employee Manual. The document is comprised of all new material for employee reference. The manual was recently completed but is ready for initial review and approval. As additional policies are created, the manual will be updated. The following processes and information are included in the handbook:

Introduction	Consumer Equality
Code of Ethics	Confidentiality and Privacy
Mission, Vision & Values	Scheduling and Flex Time
Staff Expectations	Planned and Unplanned Time-off
Staff Supervision	Social Media
Recruiting Staff	Acknowledgement

In addition to developing the Employee Manual, the Division crafted a comprehensive policy in response to the pandemic (**Rec. 6 – Pandemic Operations Policy**) at the beginning of the pandemic and continuously updated it to include new information. As the state began to re-open, a staff self-check document and acknowledgement were developed and added to the procedures (**Rec. 6 – Pandemic Acknowledgement Form**). Also, the DVI Fleet policy was developed during the fourth quarter of FY19; an Intern & Volunteer policy (**Rec. 6 – Intern & Volunteer Policy**) along with a comprehensive procedure manual (**Rec. 6 – Intern & Volunteer Manual**) were completed during the second quarter of FY2020; and the Division Trauma Informed Care Policy (**Rec. 6 – Trauma Informed Care Policy**) which was finalized during the third quarter of FY2020.

#### **Ongoing Plan and/or Implementation**

The next step is to ensure DVI employees receive training and guidance as the policies are implemented. In addition, we plan to develop a system that outlines why, when and how policies and procedures are developed. The system will also include tools for assuring policies are reviewed and updated regularly or at the very least annually.

The DVI Director and Deputy Director both have extensive experience developing and maintaining practical and useful policies and procedures. We recognize the importance of properly training staff, so they routinely refer to policy to ensure they are operating within the guidelines. There just was not enough time to reinvent all policies and fill all the gaps but DVI made significant progress. The past eight months have been uniquely challenging, but it was rewarding to focus our attention on policies to support the employees.

#### **Recommendation 7: Create Agency Program Specific Policy and Procedure Manuals**



DVI shall create and implement a policy and procedure manual for each of its 5 service units: Education, Vocational Rehabilitation (VR), Independent Living Services (ILS), Orientation & Mobility (O&M), Assistive Technology (AT). Any associated supporting units such as the instructional materials unit and Business Enterprise Program (BEP) shall also be included.

Additionally, DVI provides administrative support for several advisory boards identified in the JLOSC Final Report published in June 2019. In order to ensure clear communication, DVI will create a policy regarding the agency's coordination and administrative support provided to these groups.

Program policies will enhance service unit functionality and transparency. All policies shall be created by DVI using national standards and best practices, approved by the agency director, and posted on the agency's website. The following is not an exhaustive list but is an example of areas to address:

#### **July 31, 2020 Progress Update:**

DVI has researched the Policies and Procedures from other states and has a draft Policy and Procedure manual that addresses the individual units within DVI. The manual is currently being edited and reviewed to ensure it is revised and comprehensive.

The DVI VR team is working on policy revisions to enhance service delivery. They VR team received training for the new Pre-Employment Transition Services policy, conducted with the Workforce Innovation Technical Assistance Center (WINTAC) on 5/29. These revisions will be reflected in the Policy and Procedure manual.

#### **December 1, 2020 Progress Update:**

DVI conducted a review of service delivery policies for all programs, identified gaps, and prioritized how the work would proceed. The review proved that most programs were operating with comprehensive policies that were in need of immediate revisions (step 1) to streamline content and improve the flow and reformatting to reduce navigation challenges. Additional revisions (step 2) will focus on corrections such as, identifying and eliminating redundancies of shared processes (i.e. Client Intake) and further refining/enhancing program processes. The table below provides program-specific policy status information.

After the initial revisions described above, DVI focused attention on gaps in service-related policies and developed an outline of the future structure of DVI policy content (**Rec. 7 - Policy & Procedure Format**) when the project is complete. This is just a snapshot; we expect this list to evolve as our leadership become more engaged in policies. Policy issues included redundancy we lacked policies that would be considered best practices. Numbers 1-3 on the draft format document outlines the [General Administration](#) policies that were either nonexistent or fragmented in multiple program policies. DVI has created drafts of six new policies including:

- Accessible Communication
- Accessing Interpreter Services
- Case Documentation
- Case Record Review
- Confidentiality, Informed Consent, Release of Information

- Grievances
- Participant Record Maintenance and Review
- DVI Blind Registry

Please refer to the table for policy updates specific to each program.

[Click here](#) to visit the DVI policy page or individual links in the table to be directed to the policy. There are two documents that were still being revised when the website was updated. Those corresponding documents for IMRC and BEP policies were sent with the report.

Program	Policy & Procedure Status
<a href="#">Vocational Rehabilitation</a> & <a href="#">Pre-ETS</a>  <a href="#">VR Consumer Handbook</a>	<p>Pre-ETS policy was created at the beginning of 2020 with Technical Assistance support. It is very relevant and easy to follow.</p> <p>The VR policies were also adequate but were in need of updates in response to regulation changes.</p> <p>The VR Consumer Handbook has been revised</p> <p>DVI hired VR experts to provide assistance and guidance. VR policies being revised by the consultants in partnership with VR leadership.</p>
<a href="#">Education - Orientation &amp; Mobility</a>	<p>The education policies and procedures are practical, concise and functional.</p> <p><b>Recommended Revisions:</b> Separate Orientation &amp; Mobility from Education policies.</p>
<a href="#">Independent Living Services</a>	<p>The ILS policies were very comprehensive. They were revised during the first phase to remove a significant amount of unnecessary information and make them more concise.</p> <p><b>Recommended Revision:</b> Combine redundant policies with other programs so all programs operate under the guidance of one policy.</p>
<a href="#">Business Enterprise Program Rules &amp; Regs.</a> <b>(Rec. 7 - BEP Policies)</b>	<p>BEP Policies, Procedures, and Rules go through multiple layers to obtain final approval.</p>

Program	Policy & Procedure Status
	<p>Drafts policies are reviewed and discussed at monthly meetings of the Blind Vendors Committee who must vote to approve all program changes.</p> <p>When negotiations and revisions have completed, all policies, procedures rules and regulations go to RSA for approval.</p> <p>RSA was struggling to review BEP information and often took years to send their recommendations. When the pandemic stretched them even thinner, RSA increased the staff reviewing information for BEP.</p> <p>The policies and procedures were sent to RSA and received back with comments. When revisions are complete, they will be sent back to RSA for approval.</p> <p>Rules and Regulations haven't been updated since the 1960's They were recently created and updated by the BEP Director but have not gone to committee yet.</p> <p><b>Recommended Revisions</b> Establish a timeline to complete revisions so policies can go to committee for vote.</p> <p>Establish a timeline to review Rules and Regulations with committee and send to RSA for approval.</p>
<a href="#">Technology Training Center</a>	<p>The Technology Training Center policies were very comprehensive. They were revised during the first phase to remove a significant amount of unnecessary information and make them more concise.</p> <p><b>Recommended Revision:</b> Combine redundant policies with other programs so all programs operate under the guidance of one policy.</p>
Informational Materials Resource Center <b>(Rec. 7 – IMRC Policies)</b>	<p>The IMRC ILS policies were very comprehensive. They were revised during the first phase to remove a significant amount of unnecessary information and make them more concise.</p>

Program	Policy & Procedure Status
	<b>Recommended Revision:</b> Combine redundant policies with other programs so all programs operate under the guidance of one policy.

### **Ongoing Plan and/or Implementation**

The next step is to ensure DVI employees receive training and guidance as the policies are implemented. In addition, we plan to develop a system that outlines why, when and how policies and procedures are developed. The system will also include tools for assuring policies are reviewed and updated regularly or at the very least annually.

Both the DVI Director and Deputy Director have extensive experience with developing and maintaining practical and useful policies and procedures. We recognize the importance of properly training staff, so they routinely refer to policy to ensure they are operating within the guidelines. There just was not enough time to reinvent all policies and fill all the gaps but DVI made significant progress. The past eight months have been uniquely challenging; however, focusing on improving and creating policies to support the staff will remain a priority.

### **Recommendation 8: Education Services – Funding**

DVI shall continue working with national experts and the Delaware Department of Education in determining a suitable funding source for DVI services provided to students with blindness or visual impairment.

### **July 31, 2020 Progress Update:**

As referenced earlier, DVI is part of the Equitable Infrastructure Committee, a sub-committee of the Special Education Strategic Plan Advisory Council (SESPAC), which developed a proposed plan for creating equitable education services and funding across the state for students served through Autism Spectrum Disorder, Deaf, Hard of Hearing, Deaf-Blind, and Visual Impairment programs. Please see attached PowerPoint presentation describing the background, purpose and recommended plan which is now being discussed with stakeholders to get feedback and suggestions.

### **December 1, 2020 Progress Update:**

DVI continues to participate in the Equitable Infrastructure Committee (EIC) and meet with stakeholders to present the proposed plan for creating a statewide entity for students served through Autism Spectrum Disorder, Deaf, Hard of Hearing, Deaf-Blind and Visual Impairment programs. Below is a chart of who the EIC has presented to, additional presentations we are in the process of scheduling and the ongoing work needing to be done.

Completed Presentations	To Be Scheduled	Ongoing Work
DOE – Exceptional Children	DOE	Develop and update FAQs
GACEC – Executive Director and full council	Reading Consortium	Complete a chart of codes and regulations
DASA	EHOI	Workgroup meetings
DSEA	SWP Staff	Respond to suggestions raised
Legislators	UD/CDS	
Prison Education	Part C	
OEL	D/ASHA	
DASL	District Superintendents	
Charter Schools	School Principals	
Autism Delaware	Council on the Blind	

#### Summary of Feedback from Completed Presentations:

- Very Supportive
- Concerns about size of this endeavor
- Questions about the financial aspects
- Lots of support for losing the silos and sharing resources
- We need to demonstrate that students are going to be better served and schools could save money
- Reach out to Chiefs of Superintendents, Delaware Administrators (principals)
- Keep those presented to informed on updates
- Be clear on age range of who these services are for (0 – 21)
- Financial Analysis
  - Existing state level money and/or other
- Where would it be housed (housing agency as well as physically housed)
- Next – jump in both feet with bill, some good ideas for more buy in before proposing a bill
- Questions about the need for more discussion versus moving on what’s already been recommended
- Ideas for names... “Delaware Regional Education Association”, REGIONAL educational resource agency as it will serve all three counties; Regional Education Association of Delaware (READ)

#### Ongoing Plan and/or Implementation

DVI intends to fully participate in this collaboration as long as there is continued support for our agency to remain involved, which there appears to be. As DVI is not currently associated with a local education agency, we are discussing how we would make this transition while ensuring availability of the wrap-

around services from our other programs (Instructional Materials Resource Center, Orientation & Mobility, Independent Living Services, Assistive Technology, and Vocational Rehabilitation). The next steps for this project include:

1. Continue to engage and seek feedback from stakeholders
2. Develop core positions
3. Construct funding
4. Identify and propose legislative code changes
5. Implement, assess and adjust

#### **Recommendation 9: Education Services – Communication**

DVI shall continue working with the Delaware Department of Education (DOE) in efforts to improve communications which include creating or updating policies as follows:

- a. Develop and implement communication and procedure guidelines regarding DVI services for students in local school districts.
- b. Review its current Memorandum of Understanding (MOU) with DOE and work to bring meaningful modifications to the agreement.
- c. Develop a policy for education services from DVI to DOE.
- d. Develop a clear policy outlining the Individualized Education Program (IEP) process and protocol for blind and visually impaired students. This policy should include procedures and timeframes required for DOE and its districts to notify DVI of students with blindness or visual impairments.

#### **July 31, 2020 Progress Update:**

DVI and the DOE Liaison to DVI have established a good working relationship. Meetings and communication occur regularly to ensure the two agencies are operating in alignment. This has been particularly important and helpful during the pandemic.

As a member of the JLOSC Taskforce for DVI, DOE is aware of the recommendations above and working with DVI to address them. DVI and DOE have been meeting over the past several months to review the MOU and identify areas that require revisions, clarity or where more information is needed. The next step is to work with additional partners to draft the revisions and obtain stakeholder input. DVI understands the importance of developing a comprehensive MOU that clearly outlines roles and responsibilities as well as communication expectations. In conjunction with recommendation 7 and in alignment with the MOU, the Education Coordinator is developing/revising policies and procedures as outlined above.

It is important to acknowledge the proposed plan from the Equitable Infrastructure Sub-Committee of SESPAC because if it continues to gain support, it could certainly have an impact on DVI's Education services and structure. However, strengthening the processes and communication between DVI and DOE under the current structure will continue to be a priority.

### **December 1, 2020 Progress Update:**

DVI is working on several ways to improve our communication with the Department of Education, resulting in a better collaboration and enhanced services for students and their families.

DVI and DOE continue to revise the MOU, although this progress has slowed due to the additional support needed for DVI and LEAs to shift to education in a COVID environment. The MOU is being updated with clear communication guidelines for DVI, Local Education Agencies (LEAs) and the Department of Education (DOE).

In addition, procedures related to services for students who are visually impaired or blind will be outlined, including clearly defined roles and responsibilities of DVI and LEA staff, and aligning the MOU with DVI's updated policies and procedures. As the MOU is being reviewed to ensure it reflects meaningful education services, DVI has also sought guidance from the Workforce Innovation Technical Assistance Center (WINTAC) to meet the Federal requirements related to transition and pre-employment transition services and the partnership between Education and Vocational Rehabilitation (VR). As the current MOU includes information regarding education and Vocational Rehabilitation services, it is important for DVI to ensure there are clear guidelines for communication and processes related to transition and how DVI's Education Program, the LEAs, DVI's VR Program and students/families will work together to ensure seamless transition services are provided. DVI has developed a Pre-Employment Transition Services policy with the guidance of WINTAC, which was put out for public comment and the topic of discussion at a DVI/Vocational Rehabilitation Advisory Council Town Hall meeting. DVI will ensure this policy is reflected in the transition sections of the MOU.

In response to Recommendation #7 and because it is important for DVI to have current and complete policies, DVI reviewed the education policies and have them posted on the website. DVI recognizes that policies and procedures must comply with state and federal regulations. As such, we anticipate policies and procedures to require ongoing attention and revision in order to remain current, meet requirements and meet the changing needs of students. As this occurs, DVI and DOE will ensure the MOU is revised to reflect any necessary updates.

DVI has begun an organizational development initiative to evaluate our agency structure, identify needs and develop comprehensive training and communication plans. Below is the initial outline to address our communication needs.

#### **Communication**

- Develop a Communication Plan (Long-term around priority projects)
- Communicate with constituents – Internal and External
- Communicate with staff at all locations – especially while we work remotely
- Build trust through improved communications
- Generate regular communications (email, newsletter, social media, phone, etc.)
- Training to Address:
  - Expectations
    - Accountability – performance Evaluation
  - Communication tools
    - Assessments/Training/Self-Directed Readings/Activities (Staff)
    - Guidelines for services

As DVI further develops the communication plan, we will be addressing communication needs as an agency as well as those specific to each program. This process will provide us with an opportunity to evaluate our current communication strategies and plan for enhancing communication with our external partners, including the DOE and LEAs.

As described in recommendation #8, DVI continues to participate in the Equitable Infrastructure Committee (EIC) and meet with stakeholders to present the proposed plan for creating a statewide entity for students served through Autism Spectrum Disorder, Deaf, Hard of Hearing, Deaf-Blind and Visual Impairment programs. This proposal includes a recommendation that the “statewide entity” report to a Board and be responsible for reporting to DOE as any other Local Education Agency does. DVI and the EIC recognize the importance of communication, consistency and accountability within the education system and believe this plan, if approved and implemented, will have a major impact on improving all areas.

The Trainer/Educator II working with students, is primarily working with high school students to improve communication and assist with the transition process. She coordinates with students, families, local education agencies and DVI staff, including the TVI, VR Counselor and Vision Rehabilitation Therapist to ensure a team approach to services is being provided both for current needs and to help the student plan for their post high school goals.

Although services are individualized based on student needs, this position was designed to offer an array of services including assessment and evaluation, researching options, making recommendations, training, referral and troubleshooting. Despite the pandemic impacting how DVI provides these services, creative solutions have been implemented to ensure students and families continue to receive the services necessary. With proper safety protocols in place, some students and families are agreeable to in-person services. When that is not possible, the TE II is able to deliver trial equipment for use until a formal evaluation can be completed, offer remote training and recommend online resources for additional training videos and webinars.

The TE II maintains regular communication with students and families to keep them engaged during this unique time of remote learning. In addition, the TE II has been offering remote training to school personnel with plans to provide more in-person training to school staff once restrictions are lifted.

Another initiative that we expect will have a positive impact on communication between DVI and DOE and improve services to students and families is our involvement in the development of a department-wide constituent inquiry database. In mid-2019 DHSS began developing its version of Salesforce – a constituent inquiry database compatible with the Governor’s Office’s database. Each division within DHSS supplied common themes of constituent requests to the database builders to have them pre-loaded to permit ease of tracking.

This database will allow for accurate monitoring of each request from inception through completion with the ability for all users to follow each step of the request. In addition, the database is searchable by constituent, division, and request theme. Salesforce’s data tracking is administered by the DHSS Secretary’s Office which will distribute monthly status reports to the divisions.



Having a more formalized process for constituents to make inquiries and a tracking system to monitor and ensure inquiries have been handled to completion, will provide districts, students and families with regular opportunities to provide feedback and receive information. The database was to go live in Spring 2020 but was delayed until November 2, 2020 due to the COVID-19 pandemic.

#### **Ongoing Plan and/or Implementation**

The DVI Director, DOE Liaison and DOE Transition liaison will continue to meet and identify areas in the MOU that need revisions. Next steps will be to involve other DVI and LEA staff as well as stakeholders to ensure revisions are accurate and align with actual practices. DVI will also ensure education services and our partners are considered in the communication plan developed through our organizational development initiative.

#### **Recommendation 10: Accessibility of DVI Offices**

DVI shall continue working with DelDOT, DART, and various agencies in addressing and implementing accessibility measures to their new office locations. DVI shall submit updates on each site's progress to JLOSC.

#### **July 31, 2020 Progress Update:**

DVI continues to work with various state agencies to address and implement accessibility measures at office locations; however, the barriers associated with rerouting bus routes or relocating offices have greatly multiplied because of the daunting fiscal climate. In order to implement timely change, DVI developed a partnership with Delaware Libraries. The intent is to secure storage and training space within libraries so the DVI Technology Trainers can accommodate assistive technology needs by working with consumers at libraries located on fixed bus routes. This community-based, cost-neutral solution affords consumers the comforts of traveling less while receiving services in an accessible environment. DVI has secured space at the Georgetown Library and is beginning the MOU development process. The plan is to pilot the services in Sussex County then identify accessible locations and open one at a time.

In addition to improving physical accessibility for consumers, DVI recognizes the importance of having adequate staffing to address consumer needs. As such, DVI has submitted the recruiting packet for a Technology Trainer to work in Kent and Sussex Counties and recently repurposed a Trainer/Educator position to focus on students in K-12 programs statewide.

The pandemic has certainly impacted services across the state, but there are some lessons learned, as well. Staff and consumers quickly adjusted to incorporate more remote teaching and learning in order to maintain critical services to consumers. Although not all services can be provided in a remote fashion and not all consumers are comfortable with this mode of instruction, we have noticed an increase in participation for some consumers where meeting face-to-face was previously difficult. DVI anticipates offering a hybrid approach to services in the future to provide consumers with more service delivery options.

#### **December 1, 2020 Progress Update:**

DVI currently has four office locations and two Technology Training Centers (New Castle & Georgetown). In June 2019, the previous Director moved the DVI office and Training Center from the Milford Annex to

three Kent and Sussex offices. Since the move, DVI advocates have described the accessibility issues at all locations. The table below is a summary of accessibility issues, solutions, and priority level. Please be sure to review the location issues before continuing to the rest of the narrative.

Location	Accessibility Issues
Herman Holloway Campus, New Castle	<p>Lack of consistent sidewalks &amp; dangerous curb cuts lead to the DVI office and Technology Training Center.</p> <p><b>Solution:</b> DHSS completed all repairs/upgrades were made summer 2020.</p> <p><b>Priority:</b> n/a</p>
Hospital for the Chronically Ill, Smyrna	<p>The hospital is accessible by paratransit and fixed route; however, the bus stops on Rt. 13 outside the hospital. The challenge is walking from the bus stop to the hospital. Once off the bus, visitors must traverse along the shoulder of Rt. 13 and turn onto a two-lane road with no shoulder or sidewalk. The entire walk is approximately a quarter mile but very dangerous for a person who is blind.</p> <p><b>Solution:</b> None to date; however, DVI only has two staff at this location. Both deliver remote services in the community. This location does not have a Training Center so there is limited chance that consumers would need to meet at this location.</p> <p><b>Priority: 2</b></p>
Milford State Service Center, Milford	<p>Milford is accessible by Paratransit and fixed route. The bus stop is not far from the office and there are some minimal hazards if walking.</p> <p><b>Solution:</b> None to date; however, there is no Technology Training Center at this location. The seven staff located at this office deliver remote services in the community. There is limited chance that consumers would need to meet at this location.</p> <p><b>Priority: 3</b></p>
Stockley Campus, Georgetown	<p>This office is home to the DVI downstate Technology Center and the one most in need of solutions.</p> <p>The campus is accessible by paratransit (door to door) but it is not on a fixed bus route.</p>

Location	Accessibility Issues
	<p>This location is nestled in the back of campus which is accessed via a farm style uneven road with no sidewalks. If the fixed routes were changed to add this as a stop, the walk from the campus entrance to the DVI building would still be dangerous for a blind person.</p> <p><b>Solution:</b> DVI develop a partnership with the Georgetown Library to conduct remote technology training and store equipment. See narrative for additional details.</p> <p>If successful, DVI intends to look for additional remote locations in Kent and Sussex Counties to expand services.</p> <p><b>Priority: 1</b></p>

Since the July JLOSC report, DHSS addressed the accessibility issues on the Herman Holloway Campus. During the summer of 2020, the campus underwent construction to improve curb cuts and add/repair sidewalks. The curb cuts and sidewalks were reconfigured and repaved to ensure pedestrians are afforded a safe, cane-friendly walkway from the fixed bus route stop to the DVI office.

DVI forged ahead with the most tangible solution to address the accessibility issues at the Georgetown Training Center. When the library was allowed to have visitors, DVI met with the Library Director and toured the facility. The library has several private classrooms on the first floor and a reference desk with a computer on the second floor. The second floor is a barely used, quiet, massive space with an elevator. DVI will use part of the desk for a large magnifier, install screen readers on the desk computer, and can use the large television for Zoom Text, if needed. Small portable devices will be kept in a locked cabinet on the second floor. The location is approximately one block from the fixed bus route and building is fully accessible. In return for providing us a free space, DVI intends to teach library staff to use the screen reading software as well as the desktop magnifier so patrons with visual impairments have access to the tools and library staff have the ability to assist them. In addition, DVI will have the Independent Living team add Braille markers to the elevator, bookshelf ends, front desk, etc. DVI will incorporate community resources into remote training to encourage increased community integration. The Library Director will display DVI brochures and both entities agreed to promote partnership on websites and social media.

After finalizing the terms, DVI and the Georgetown Public Library signed a partnership agreement, with an effective date of November 1, 2020, to formalize the project (**Rec. 10 – Georgetown Pub. Library Partnership**). In addition, DVI had several excellent candidates for the Kent/Sussex County Technology Trainer position that will be the new remote trainer in Georgetown. DVI extended a job offer and is negotiating terms with the candidate.

The Georgetown Library is a nonprofit that receives funding from the State Library System but is not part of the County Library system. Their Board of Directors and Director had committed to increasing their foot traffic and awareness through community partnerships. Ironically, the library had begun to develop similar partnerships with community organizations prior to pandemic. This may seem like a lot of detail but it's important to paint a picture of how fortunate DVI is are to have amazing partners and a perfect space at no cost. We intend to successfully start this program and replicate it in other locations and hope to find other partners like the Library.

A very active DVI advocate has a tremendous amount of knowledge with accessibility. DVI administration arranged a meeting to see if the advocate would be interested in a business partnership with DVI. We proposed a contractual arrangement so we would have someone to take the lead in helping DVI to create a comprehensive accessibility plan.

#### **Ongoing Plan and/or Implementation**

The Training Center staff will receive training on how the remote program is designed, understand the expectations and gain an understanding of how to effectively provide community-based services. Consumers will be informed of DVI providing community-based training and will be encouraged to utilize community sites.

DVI intends to research additional cost-neutral locations including WIOA partners in hopes of developing additional remote training locations.

DVI is committed to performing an accessibility review to learn in detail the accessibility issues faced by people with blindness regularly. If the advocate mentioned above is not interested, we hope to engage our councils to assist with this project.

#### **Recommendation 11: Boards, Committees, or Councils related to DVI**

DVI shall review and report to JLOSC regarding the number of advisory boards and groups that relate to their agency's mission. The JLOSC Final Report published in June 2019 lists 6 groups and outlines their composition and staffing. There are additional boards and councils that serve areas of interest and DVI could benefit from forming stronger communication channels. In some cases, DVI is not included in the board structure and would benefit from inclusion. The report shall include information such as board title, mission statement or purpose, statutory authority, and frequency of meetings. Additionally, the report should include a summary of DVI's current level of involvement with each board identified and any areas of improvement they have identified.

#### **July 31, 2020 Progress Update:**

Prior to the COVID-19 pandemic, DVI was in the process of securing a third-party contractor, Dr. Fred Schroeder, an expert of state and federal government operations, to conduct the evaluation of Boards, Committees, and Councils related to DVI. Since the fiscal climate has taken a dramatic shift, DVI is no longer able to afford the costs associated with Dr. Schroeder and is developing an alternate plan to either identify a qualified person within the state government or a contracted consultant from the state procurement vendors.

**December 1, 2020 Progress Update:**

<b>Board Title</b>	<b>Mission/Purpose</b>	<b>Statutory Authority</b>	<b>Meeting Frequency</b>	<b>DVI Level of Involvement</b>
Council on the Blind	Serves in an advisory capacity to the State of Delaware on matters that impact persons with visual impairments or blindness. The Council considers matters relating to the general supervision and control of the education, training and welfare of blind and visually impaired persons residing in Delaware.	Delaware Code Title 29, § 7913	Monthly (except July)	<p>The DVI Director is an ex-officio member.</p> <p>At least three members of the DVI leadership team attend each meeting.</p> <p>DVI provides administrative support for the council.</p>
Vocational Rehabilitation Advisory Council (State Rehabilitation Council)	Review, analyze, and advise the <a href="#">designated State unit</a> regarding the effectiveness of the VR program, services and consumer satisfaction; advise and assist with the development of the State Plan; jointly develop goals and priorities of the State Plan; prepare and submit the annual report; coordinate with other councils.	Mandated by the Rehabilitation Act of 1973	Quarterly meetings are mandated however the Council chooses to meet monthly.	<p>The DVI Director is an ex-officio member.</p> <p>A VR counselor is also serves an ex-officio member.</p> <p>At least three members of the DVI leadership team attend each meeting.</p> <p>DVI provides administrative support for the council.</p>
Independent Living Advisory Council	To provide guidance in the development and expansion of the Independent Living Services program on a statewide basis to DVI, as well as to the State Independent Living Council (SILC), through DVI.		Quarterly	<p>DVI's ILS Administrator attends each meeting.</p> <p>The DVI Director or designee attends each meeting.</p>

				DVI provides administrative support for the council.
Business Enterprise Program/Blind Vendors Committee	To be a consumer driven, progressive, and nationally renowned entrepreneurial program for the blind focused on the needs and desires of the customers.	Delaware Code Title 29, § 7929	Monthly	<p>DVI's BEP Administrator and Business Service Supervisor attends this meeting.</p> <p>Three members of DVI leadership attend this meeting.</p> <p>The DVI fiscal team attends this meeting.</p> <p>DVI provides administrative support.</p>
Commission for Statewide Contracts to Support Employment for Individuals with Disabilities	To further the policy of the State to encourage and assist blind and other severely handicapped individuals to achieve productive gainful employment by assuring an expanded and constant market for their products and services.	Delaware Code Title 16, Chapter 96	Monthly	<p>The DVI director serves as an ex-officio member.</p> <p>DVI provides administrative support to this council.</p>

In addition to the councils listed above, DVI holds membership on other councils and committees including the Statewide Independent Living Council, the State Council on Persons with Disabilities, the Employment First Oversight Commission and the Human Subjects Review Board. DVI can provide a comprehensive list of these memberships upon your request.

Despite membership on many councils and committees, DVI is not a member of the Governor's Advisory Council for Exceptional Citizens. Membership on this council would be advantageous to both DVI, the council itself, and the many consumers it represents. DVI is continuing to pursue membership on this council.

DVI continues to work closely with all of the advisory councils to provide information, receive feedback and identify areas of interest for the council and DVI to focus efforts. Although a formal review of each has not been completed, the VRAC/SRC was included as part of monitoring by the Rehabilitation

Services Administration (RSA). The 3 primary areas of focus for monitoring were data, fiscal and state plan. To address a contingency placed on the Delaware WIOA Combined State Plan, DVI was required to submit a detailed plan and timeline for ensuring the state plan goals and priorities are jointly developed with the Vocational Rehabilitation Advisory Council/State Rehabilitation Council (SRC) and DVI. With the submission and approval of the DVI plan to jointly develop goals and priorities with the SRC, the contingency was removed from the DE Combined State Plan and it was approved in September 2020.

Steps approved by RSA are listed below and the full plan (attached) has been included in the DVI portion of the state plan.

- A. Constitute a State Rehabilitation Council (SRC) in compliance with regulations at 34 C.F.R. § 361.17.
- B. Conduct the Comprehensive Statewide Needs Assessment (CSNA) with the SRC as described in 34 C.F.R. § 361.
- C. Review findings derived from the CSNA with the SRC by September 15, 2021.
- D. Conduct sessions with the SRC to jointly develop goals and priorities by December 1, 2021.
- E. Submit modified description I of the DVI VR portion of the Delaware WIOA State Plan March 1, 2022.

DVI began working on getting into compliance with the council immediately with assistance from the Office of Boards and Commissions and our DAG who has been attending VRAC/SRC meetings regularly for the past several months. We have been working on filling vacancies as well as researching member terms in order to identify anyone who is out of compliance. One member was found to be serving an illegal term based on Federal regulations and council by-laws. This member was asked to resign by the Office of Boards and Commissions, but he has refused. DVI is providing updates to RSA regarding the situation, however we anticipate this being a finding in our monitoring report once it is completed.

The issues with the VRAC/SRC that were identified through the State Plan and RSA monitoring have been ongoing for several months and extremely time consuming, thus this council has received most of our attention with regard to this recommendation. However, DVI's relationship with the other councils listed above are collaborative and we anticipate this continuing. Conversations in recent meetings have been informative and we are receiving positive feedback from members. As we continue to work through the many steps in the plan approved by RSA, we believe the VRAC/SRC, including DVI staff who attend, will be more informed and prepared to actively engage in meaningful activities to advise and strengthen the DVI VR program and its effectiveness to serve individuals who are blind or visually impaired.

In order to perform a more comprehensive and unbiased evaluation of the councils, DVI did explore working with consultants. However, with the changing fiscal climate we do not have the agency funding needed to support the additional work of these consultants. We continue to explore options through existing state contracts, but have not found qualified vendors to do this type of work yet.

### **Ongoing Plan and/or Implementation**

DVI will continue to work on the Plan that was approved by RSA in order to jointly develop goals and priorities with the VRAC/SRC and work with RSA to receive technical assistance if we encounter any delays or challenges. We would like to collaborate with the councils to develop and offer training on public meetings and new member orientation in order for members to be more informed about the purpose of the council and their roles and responsibilities as members. We hope this will also result in easing recruitment for hard to fill positions and increasing participation.

**Recommendation 12: Follow Up Reporting**

DVI shall submit progress reporting to JLOSC staff regarding the progress and implementation of Recommendations 3 through 11 on the following schedule:

- Progress Report #1 – July 31, 2020
- Progress Report #2 – December 1, 2020

**July 31, 2020 Progress Update:**

Thank you for reviewing the first of two progress updates submitted July 31, 2020.

**December 1, 2020 Progress Update:**

Thank you for reviewing the second of two progress updates submitted December 1, 2020.



**Delaware Division for the Visually Impaired**

Business Enterprise Program Policies & Procedures

Resubmitted to RSA for Approval on June 2, 2020

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The Recruitment / Enrollment / Training of BEP Vendors Policy was previously approved by RSA on January 5, 2016 and has been resubmitted with three (3) modifications (Addendum 1). Until revisions are approved, the revised policy has been are marked in blue font and dated.

## Establishment, Maintenance and Development of BEP Locations

### I. PURPOSE/SCOPE

To establish consistent procedures for establishing, maintaining, and developing BEP locations.

### II. DEFINITIONS

**Net Income:** shall mean total earnings following adjustment costs for business operations such as set aside, equipment (phone, computer, internet, machinery, transportation, depreciation); fixed costs (taxes, licenses, pension, insurances, non-government building utility costs); and variable costs (other fluctuating costs associated with the daily site operation).

**Fair Minimum Return:** three (63) months of operation / 1500.00 optional per month

**Fair Minimum Return Payment:** shall mean, with respect to any measuring period, a payment to a Probationary Vendor in an amount equal to the difference between the a Fair Minimum Return and such Probationary Vendor's Net Income for such period, assuming such Net Income is less than the applicable Fair Minimum Return.

**Unestablished Facility** shall mean a facility that has no proven history defined as not achieving enough net income at or above Fair minimum Return within the previous 12-month period.

**SLA** shall mean the Delaware Department of Health and Social Services, Division for the Visually Impaired, the BEP state licensing authority.

**BVC:** Blind Vendor Committee elected Vendors by the Vendors who represent the vendors

**Account:** Account one (1) is the operator set aside account it is both savings and checking. Account two (2) is the Business account for operation of a new business by the SLA. Account three (3) is a money market and checking for program operations it is where unassigned money from vending and other SLA managed operations...

**Satellite location:** an unassigned location on the bid list of locations available as a primary facility

**Probationary Vendor** shall mean a licensed vendor [operating a newly licensed BEP facility during its first 12 months]

### III. PROCEDURES

Probationary Vendors-First 12-Months of Operating a Facility as a Licensed Blind Vendor

- A. A Probationary Vendor is assured a Fair Minimum Return

## **Delaware Division for the Visually Impaired**

### **Business Enterprise Program Policies & Procedures**

Resubmitted to RSA for Approval on June 2, 2020

- B. All Fair Minimum Return Payments to vendors shall be issued monthly to qualifying Probationary Vendors, through BEP Account #3 which is established to support the vendors enrolled within the BEP.
- C. Entitlement of the Fair Minimum Return to the Probationary Vendor of an established facility is contingent on the following three criteria:
  - a. The Probationary Vendor is operating a New Facility that has no proven history of achieving a Fair Minimum Return within the prior 12-months, and/or;
  - b. The manager has never previously managed a vending facility, and/or;
  - c. The BEP Director determines, in his/her discretion, the additional support is critically important in order to establish or re-establish the viability of a facility with a recent history of failing to achieve a Fair Minimum Return for an identifiable cause other than vendor mismanagement based upon review with the Blind Vendors' Committee of prior Reports for that location over the course of the prior year. This option may only be used when reasonable expectation dictates that the facility will be restored to its previously profitable status.
- D. When a potential Probationary Vendor is ready for assignment of a facility, he/she may be offered a new site that either has no history of achieving a Fair Minimum Return or has been established but has operated without achieving a Fair Minimum Return [for a period of 12-months]. The Probationary Vendor has the discretion to either accept the offered site or decline the site in favor of an established site. The SLA has the discretion to merge two or more satellite locations, if feasible, to create a profitable primary site for the Probationary Vendor.
- E. A previously licensed vendor who left the BEP in good standing and is returning to the BEP may choose the option of receiving a Fair Minimum Return payment.
- F. Any licensed vendor shall be responsible to repay the total sum of Fair Minimum Return payments they received back to the SLA for reimbursement into BEP Account #3. If you take Fair Minimum payment will be paid in full by all take it. At 125.00 per month for 36 months. A repayment schedule shall be recorded and agreed upon between the vendor and the SLA. The payment schedule shall be no less than 12-months and no more than 36-months. Vendors may make additional payments each month; however, no less than the standard agreed upon amount shall be paid, and payments shall be made within the agreed upon timeframe.
- G. This policy shall be incorporated as an addendum into new vendor licensing agreements as an addendum. Within the new and existing vendor licensing agreements there shall also be set forth provisions for the vendor to establish goals of growing their business' net profit margin (net profit margin = net income/sales revenue) at two (2%) percent annually.
- H. The BEP Director and the Probationary Vendor shall agree upon a beginning inventory value prior to the facility being opened for business. At the end of the first full calendar month of business for the first nine (9) months of operation thereafter, a physical inventory shall be conducted and agreed upon by both parties.

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- I. If an agreement is not reached BVC and SLA will meet with operator to negotiate a fair term for contract
- J. If the BVC, SLA and Operator cannot make a satisfactory term then operator may request to speak with BVC and Director of Division. Due to Operator being a probationary operator they would not have Randolph Sheppard procedures to file an arbitration.
- K. Upon completion of the inventory at the end of each full calendar month's operation, the BEP Director shall calculate the Probationary Vendor's accumulated net income for the period and adjust it to reflect any change in the value of the inventory. If the net income for the month is below the Fair Minimum Return, the SLA will issue a check to the Probationary Vendor for the difference, so the total net income amount equals a Fair Minimum Return.
- L. All location stock, funds, equipment, and fixtures are property of the State of Delaware (SLA) and are not the property of the Probationary Vendor. The licensed vending facility manager is not allowed to take funds from the BEP vending facility income using any other process. All records of inventory, income, etc. will be maintained in the licensed vendor's BEP case file. (All distribution will be determined by the SLA after a Report has been prepared for the location)

## **Satelliting**

- A. A satellite location is defined as an unassigned location on the bid list of locations available as a primary facility, a new site that opens and receives no bids, or a site that no one takes on as a primary site. A primary facility is defined as a licensed vendor's current location. Should a site not be at the income level of \$15,000.00 annual net profit, the site remains unassigned. An unassigned site may be considered to become a satellite operation by the SLA once the site exceeds \$15,000.00 net profits during the prior completed fiscal year. A satellite location is a temporary business operation until the site obtains a permanent operator. Prior to becoming a satellite location, the site is overseen by the SLA. Once the site becomes an operational satellite location, the site is then overseen by the vendor of said operation. The satellite location shall remain on the bid list until the site is successfully bid on as a primary location. The SLA has the discretion to merge two or more satellite locations to create a profitable primary site.
- B. In the event the SLA determines that a location is eligible for stellateing, following no submitted bids for the operation of the facility, the following considerations will be taken:
  - a. Profits from a satellite location are paid to the satellite manager for the duration of the satellite status. Two consecutive net losses (two cycles/four months) on P&Ls shall result in a formal meeting with the BEP Director in conjunction with the BVC to discuss future options/directions for the satellite location and to establish a corrective action business plan for moving forward.
  - b. A satellite location remains in "open bid" status during the satelliting period with a minimum 30-day notice of full-time manager assignment. New manager assignment will

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be effective on the first day of the next new P & L period to a satelliting manager before the location is transitioned to another licensed vendor.

- c. The following conditions shall apply when selecting a licensed vendor among multiple applicants seeking to satellite a single location. When a management position is to be filled at a vending facility within the BEP Program, the BEP Director shall solicit applications from all (licensed) vendors who are qualified. The Division may then fill this management position with the applicant of its choice. Factors which the Division shall consider in choosing an applicant include, but may not be limited to seniority, experience, managerial skills, administrative skills, training, education and suitability of the applicant to any special requirements of the vending facility. The Seniority is not a sole determining factor in the choice. The Delaware Committee of Blind Vendors shall be consulted (IAW Delaware Active Participation Policy) concerning the Division's proposed decision.
  - i. If There is no agreement between the BVC and SLA, then the first step is to take to the DVI Director for a decision.
  - ii. Then is to use the Grievance Process as outlined in Delaware Rules and policy.

## **Annexation**

In order to annex combined locations, all the following conditions shall apply:

- A. If a vendor is making below \$35K net profit per year, then that vendor may pursue an annexation site. If, however, a vendor is exceeding \$35K net income per year, then the vendor may not pursue an additional site under annexation. This shall be done prior to the beginning of the federal fiscal year so that the RSA15 report can be completed efficiently. Following the bid process, the SLA, in conjunction with the BVC, shall decide for apartment of the annexed site. This shall be followed by a public meeting to inform interested parties of the decision(s) and garner any public comment pertaining to the process followed and decision(s) rendered. Response to public comment shall be rendered by the BEP Director in conjunction with the BVC via the State of Delaware's public meeting policies.
- B. The licensed vendor must be in good standing with the BEP (no delinquent payroll or set aside obligations or written citations within their annual evaluations) with a minimum of 48-months experience continuous service within the BEP.
- C. Within those prior 48-months the licensed vendor must have achieved the objectives and goals set forth in their operator agreement.
- D. Final annexation of any satellite site shall be approved by the BEP Director in conjunction with the BVC by majority vote after approval from the Division for the Visually Impaired (DVI ) Director.

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### **Bid Process**

- A. When a BEP vending facility becomes available for bid, a Notice of Vending Facility Opportunity is sent by the BEP Director to all licensed BEP vendors, at which time, an interested licensed vendor must submit an electronic response via E-mail stating their intent of interest within fourteen (14) calendar days of the BEP Director's E-mail.
- B. When a management position is to be filled at a vending facility within the BEP Program, the SLA shall solicit applications from all (licensed) vendors who are qualified. The SLA may then fill this management position with the applicant of their choosing. The SLA will use information provided -. Factors which shall be considered in choosing an applicant include but may not be limited to: , experience, managerial skills, administrative skills, training, education, seniority and suitability of the applicant to any special requirements of the vending facility. The Delaware Committee of Blind Vendors shall be consulted concerning the proposed decision of the SLA.

### **Probationary Vendor Site Assignment Acceptance Form**

I, \_\_\_\_\_, understand that I am being offered the \_\_\_\_\_ as my assignment site under the State Licensing Agency (SLA) of the Business Enterprise Program (BEP). I further acknowledge and understand that this assignment site has either no history of profitability or has a history of net income less than a Fair Minimum Return (as defined in BEP Policies).

By signing this Vendor Site Acceptance Form, I am accepting this site as my assigned BEP location.

BEP Vendor (Print Name) \_\_\_\_\_

BEP Vendor (Signature) \_\_\_\_\_ Date \_\_\_\_\_

BEP Director/Designee Signature \_\_\_\_\_ Date \_\_\_\_\_

This policy shall be effective upon documented approval from the Rehabilitation Services Administration.

## **Dress Code Guidelines for BEP Vendors**

### **I. PURPOSE/SCOPE**

To establish consistent and clearly defined guidelines regarding appropriate dress and appearance in the business. This policy applies to all BEP Vendors and trainees and should be followed as applicable to the given work-day schedule and situation; i.e.; meetings, tours of the operation, etc.

### **II. PROCEDURES**

Professional judgment, safety standards, and common sense should be exercised when choosing appropriate dress for your business. The below offers guidance for choosing the appropriate attire. Should a vendor and/or vendor employees fail to adhere to proper dress code standards, the individual(s) in question shall be issued a verbal warning in the form of an e-mail which shall not be placed in the individual's employment file. Should the issue continue, a written warning which shall be placed in the individual's employment file shall be issued. Continual violation of standard dress code requirements shall result in additional written warnings; placed in the individual's file; and may result in further disciplinary action. Additionally, written warnings shall become part of the employee's formal bi-annual review sessions with the BEP Director and the BVC and shall remain a part of the review file for a statutory limitation period of three (3) years.

This policy shall be effective on upon documented approval from the Rehabilitation Services Administration.



## **BEP Processes for Producing RSA 15**

### **I. PURPOSE/SCOPE**

To provide standardized policies and practices for the BEP Process for Producing RSA 15 as well as an invoice system for all BEP charge services. This policy shall apply to all locations of the BEP.

### **II. DEFINITIONS**

**Quinquennial:** Occurring or being done every five years.

### **III. PROCEDURES**

- A. The Division for the Visually Impaired SLA shall ensure that the BEP is independently audited by an outside auditor on a Quinquennial basis, (this cost of the audit would be split between the program and state at 75%/25% ratio state/program) the end of the federal fiscal year to ensure the fiscal integrity of the BEP (If any other audits are requested it would be at the cost of the requesting entity). It is the responsibility of The Division for the Visually Impaired SLA to provide a copy of the findings to the BVC in a timely basis not to exceed 30 days past publication of the report.
- B. All probationary and licensed vendors will turn in their report to the DVI fiscal officer no later than the 10<sup>th</sup> day of each month. All probationary and licensed vendors shall receive an e-mail, as needed, from the DVI fiscal officer notifying them of their responsibility for timely submission of the report. Vendors will still be required to submit their monthly reports; however, supporting receipt documentation shall not be required.
- C. The DVI accountant shall revise the report to include charges for set-aside payments, and fringe contributions.
- D. Within each calendar month the DVI accountant shall also be responsible for reconciling and documenting the reconciliation of all BEP bank accounts to be incorporated on the report.
- E. With all corresponding source documentation as applicable (e.g. receipts, checks, deposit slips, financial statements). On a semi-annual basis (twice per program year) all vendors will participate in a random audit of their financial statements which shall include the requirement to submit all receipts for the requested month to the DVI Fiscal Officer in addition to the draft Report no later than the tenth (10th) day of each month. If findings are substantiated where receipts are not properly accounted for, the SLA shall continue to request receipts in each successive pay period until the draft Reports are submitted correctly. The SLA shall notify vendors of their audit dates with a minimum of at least five (5) business days prior to the audit start-date. Receipts shall be randomly requested for timeframes within the previous six (6) months for audit purposes.

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## **Format and Integrity of the BEP financial statements**

- A. The BEP Report shall be initially compiled utilizing probationary and licensed vendor draft statements. What is reported is to update the RSA 15.
- B. The probationary and licensed operators' expenses and profits shall be reported on the stand 20 or RSA 15 monthly report DVI fiscal administrative officer.
- C. Total set a-side will be reported on stand 20/Monthly RSA 15 report.

## **Invoicing and billing practices for BEP services**

- A. When a location receives a request for charge service provided by the BEP, the Vendor or designee in charge will complete all information on the BEP request form.
- B. The vendor or the designee will mail or fax the form to the requestor for review. The requestor will sign under the authorized signature confirming approval and funding of the service listed on the BEP request form.
- C. The BEP fiscal Office follows the standard **GAAP principles** pertaining to BEP/SLA staff making purchase requests which incorporates the approval of the BEP Director, the Division Director (if applicable), as well the BVC, and the BEP Fiscal Office. Because prior approval is required, it is important for the BEP/SLA staff to wait for the signed approval prior to making any purchases. This does not apply to BEP vendors.
- D. On the day of service, the vendor or designee will hand deliver the invoice/ bill for the amount recorded on the BEP request form.
- E. There will be no paper or food products returned to the location for re-use. (No credits are authorized).
- F. In preparing the invoice/ bill the following information will be recorded:
  - a. Bill To: The authorized signature on the BEP request form, including the billing address.
  - b. Date: Date of billing
  - c. Invoice number: The invoice number will be a 9-digit system, starting with the initial of the location; i.e.,
  - d. Connective Indian River will be recorded as CIR000001
  - e. The next invoice number will be CIR000002.
  - f. Date: Date of service
  - g. Description: Purpose of charge request
  - h. Total amount due: As recorded on the BEP request form
- G. Each location shall maintain a tracking sheet to record the following information for each charge request:

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- a. Bill to information
  - b. Date of service
  - c. Invoice number
  - d. Total amount due
  - e. Date billed
  - f. Date paid
- H. The actual invoice must be used for reports and recording of transactions on all documentation, not projected revenues.
- I. All locations that process their payments to vendors through the main office will approve all payments according to the below outline.
  - a. All invoices/statements are date sensitive, and therefore, must be reported according to the date of the invoice/statement and in compliance with the same reporting period.
  - b. All invoices/statements must be stamped with the location stamp, or the vendor or person in charge managing the day-to-day operation shall sign the invoices/statements.
  - c. The BEP Administrative Officer will ensure that all invoices/statement dates follow the current Report.
  - d. The BEP Administrative Officer will ensure all invoices/statements are signed by the authorized person in charge.

The BEP Administrative Officer will notify the location to revise and resubmit report.
- J. A copy of the BEP completed form will be submitted with the weekly paperwork for the SLA to record same information on the weekly mini Report.
- K. A copy of the invoice will be submitted with the weekly paperwork upon receipt of payment along with a copy of the check.

This policy shall be effective on upon documented approval from the Rehabilitation Services Administration.

## Third-Party Vendor/Suppliers Misappropriation Policy

### I. PURPOSE/SCOPE

This policy is established to facilitate the development of controls that will aid in the detection, prevention, and prosecution of Business Enterprise Program ("BEP") third-party vendor/supplier misappropriation of property of the BEP vendor and the State Licensing Agency("S LA").

### II. DEFINITION

Third Party- is anyone whom we do business with and/or provides a service.

### III. POLICY

The SLA adheres to a 30-day repayment structure for misappropriation of assets. Any investigation leading to the confirmation of misappropriation by any BEP third-party vendor/supplier shall result in due process by the appropriate legal authorities. Should a second incident occur, the third-party vendor shall be restricted from the BEP vendor's list for a period of five (5) years.

#### **Actions constituting misappropriation:**

Any irregularity that is detected or suspected must be reported immediately to the BEP Director and/or the Director's designee, who in turn, shall coordinate all investigations in conjunction with the Division Director and the Blind Vendor's Committee (BVC) pertaining to the Attorney General's Office, the Better Business Bureau (BBB), the Delaware Office of Management and Budget/Government Support Services (OMB/GSS), and other appropriate entities; both internal and external. The term misappropriation refers to but is not limited to the unauthorized improper or unlawful use of funds, securities, supplies, or other assets of the SLA and/or the BEP, including without limitation any of the following acts:

- A. Imprudence in the handling or charging of money, checks, bank account transactions, or any other financial transactions; and
- B. Impropriety in the handling of equipment or other tangible items related to the vendor's BEP business.
- C. Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation shall be made in conjunction with the SLA, the BVC, and the Division Director.

#### **Confidentiality:**

The SLA treats all information received confidentially. Any person who suspects misappropriation by a BEP third-party vendor/supplier shall notify the SLA Director or the Director's designee immediately and should not attempt to personally conduct investigations or interviews related to any suspected misappropriation on their own. Investigation results shall not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the

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reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect the SLA and the BEP from potential civil liability. Authorization for investigation shall be under the guidance of the state's Attorney General's Office.

#### **Reporting:**

A Person who discovers or suspects activity constituting misappropriation by a BEP third-party vendor/supplier shall report such activity to the BEP Director or the Director's designee. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the BEP Director or the Director's designee. No information concerning the status of an investigation will be given out by the SLA. The proper response to any inquiry is "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation", "the crime", "the fraud", "the forgery", "the misappropriation", or any other specific reference.

#### **Termination of Services:**

Termination of any and all contracts/business agreements with any third-party vendors/suppliers shall be duly enforced should misappropriation in a BEP third-party vendor or supplier's business practices be proven. Actions which are determined to be a violation of this policy shall constitute grounds for the termination of said third-party vendor/supplier contracts/business agreements. Should restitution not be made back to the SLA within the specified time-period, legal action shall be further taken to ensure restitution is made.

Pending approval from the State Attorney General's Office, upon conclusion of any investigations, and a finding of guilty in the court of law, the BEP third-party vendor's/supplier's information regarding the violation of theft or misuse or misappropriation of funds or equipment shall be forwarded to the State of Delaware Better Business Bureau (BBB) for public record as a safeguard against future such improprieties by said vendor or said 3<sup>rd</sup> party vendor's employees.

Any action taken against the third-party vendor/supplier shall commence following consult with the SLA, the BVC, the Division Director, and the State of Delaware Attorney General's Office beginning with, during, and at the conclusion of any investigation.

The SLA shall take all action; legally, and other; to the fullest extent of the law.

This policy shall be effective upon documented approval from the Rehabilitation Services Administration.

## **BEP Licensed Vendor Misappropriation Policy**

### **I. PURPOSE/SCOPE**

This policy is established to facilitate the development of controls that will aid in the detection, prevention, and prosecution of Business Enterprise Program (“BEP”) vendor misappropriation of property of the BEP and the State Licensing Authority (“SLA”). It is the intent of the SLA to promote appropriate, consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.

### **II. POLICY:**

The SLA adheres to a 30-day repayment structure for misappropriation of assets. Any investigation leading to the confirmation of misappropriation by any BEP vendor will result in six Two (6)(2) months’ probation with financial coaching and recommended additional vocational rehabilitation (“VR”) services for said vendor. The Second time will result in a four (4) probation. This course of action shall be afforded to the BEP vendor twice during said vendor’s license term. Should a third offense occur during said vendor’s license term, immediate license termination with respect to all responsible parties shall ensue.

#### **Actions constituting misappropriation**

Any irregularity that is detected or suspected must be reported immediately to the SLA Director and/or the Director’s designee, who in turn, shall coordinate all investigations in conjunction with the Division Director and the BVC pertaining to the Attorney General’s Office, and other appropriate entities. The term “misappropriation refers to, but is not limited to the unauthorized, improper or unlawful use of funds, securities, supplies, or other assets of the SLA, including without limitation any of the following acts:

- A. Non-compliance with BEP Policy in the handling or reporting of money, checks, bank account transactions, or any other financial transactions; and
- B. Impropriety in the handling of equipment or other tangible items related the vendor’s BEP business.

#### **Other:**

Irregularities subject to code of conduct and contractual due process and rights concerning moral, ethical, or behavioral conduct should be resolved by the SLA in conjunction with the BVC.

#### **Confidentiality:**

The SLA treats all information received confidentially. Any Person who suspects misappropriation shall notify the SLA Director or the Director’s designee immediately and should not attempt to personally

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conduct investigations or interviews related to any suspected misappropriation on their own. Investigation results shall not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect the SLA and the BEP from potential civil liability. Authorization for investigation shall be under the guidance of the state's Attorney General's Office.

#### **Reporting:**

An employee who discovers or suspects activity constituting misappropriation shall report such activity to the SLA Director or the Director's designee. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the SLA Director or the Director's designee. No information concerning the status of an investigation will be given out by the SLA. The proper response to any inquiry is "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation", "the crime", "the fraud", "the forgery", "the misappropriation", or any other specific reference.

#### **Termination:**

Should restitution not be made back to the SLA by the vendor and/or BEP Vendor involved by the next pay-period, legal action may be further taken to ensure restitution is made. Pending approval from the State Attorney General's Office, upon conclusion of any investigations, and a finding of guilty in court of law, the BEP vendor's and/or BEP employees found guilty information regarding the violation of theft or misuse or misappropriation of funds or equipment shall be forwarded to the State of Delaware Credit Bureau, the Federal Credit Bureau, and the Better Business Bureau for public record as a safeguard against future such improprieties by said vendor or said vendor's employees. Operator May file due process under BEP Grievance Policy.

This policy shall be effective upon documented approval from the Rehabilitation Services Administration.

### **Probationary Vendor Re-payment Agreement**

Probationary Vendor Name (Please Print): \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Home Phone: \_\_\_\_\_

Business Phone: \_\_\_\_\_

Email Address: \_\_\_\_\_

I, \_\_\_\_\_, agree to the following financial terms of reimbursement to the SLA as part of my probationary vendor employment:

Fair Minimum Return

☐ Yes ☐ No

Total Amount \_\_\_\_\_

Initial Stock/Inventory

☐ Yes ☐ No

Total Amount \_\_\_\_\_

Cash Bank

☐ Yes ☐ No

Total Amount \_\_\_\_\_

Any licensed vendors shall be responsible to repay the total sum of fair minimum return payments to the unassigned vending savings account. The payment schedule shall be no less than 12-months and no more than 36-months. Vendors may make additional payments each month; however, no less than the standard agreed upon amount shall be paid, and payments shall be made within the agreed upon timeframe.

I understand that reimbursement to the SLA shall begin following the first 90-days of my probationary period and shall be made in accordance with the reimbursement terms agreed upon per the repayment schedule at \_\_\_\_\_ per-month and stated below based upon the following formula:

Gross Sales to Date \_\_\_\_\_

Cost of Goods Sold to Date \_\_\_\_\_

Net Proceeds to Date \_\_\_\_\_

Surplus/Deficit to Date \_\_\_\_\_

Reimbursement Amount to SLA \_\_\_\_\_

Probationary Vendor Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

Division Director Signature \_\_\_\_\_

Date: \_\_\_\_\_

This agreement policy shall be effective upon documented approval from the Rehabilitation Services Administration.



## **BEP Licensed Vendor Code of Conduct**

### **I. PURPOSE/SCOPE**

This policy applies to all prospective or current employees of the BEP regardless of employment agreement or seniority.

### **II. PROCEDURES**

Persons within the BEP are bound by the terms of their BEP Assignment to adhere to specific guidelines applicable to every work-related space and during the fulfillment of their duties. All employees are obliged to know the Employee Code of Conduct (to be a part of Blind Operators employee Handbook) and follow its prescripts.

Compliance with Law (Already taken care of) (Out)

Respect in the Workplace (training) (out)

Protection of BEP Property (Out)

Professionalism (training) (out)

Personal Appearance (Out) (Training)

Job Duties and Authority (out)

Absenteeism and Tardiness (Out)

Conflict of Interest (Out) (training)

All BEP Operators

Collaboration (Out)

Communication (out)

Harassment (out) Let law take care of this)

This policy shall be effective upon documented approval from the Rehabilitation Services Administration.

## New BEP Vendor Payroll/Accounting Policy

Blank BEP PO [Read-Only] - Excel

Kloepfer, Andy (DHSS)

D32 BVC Approval

Purchase Approval Form  
Department of Health and Social Services  
Division for the Visually Impaired

PO Date:

BEP

Vendor Information: Ship To (select from list below):  
Name: Biggs  
Address:  
City/State/Zip: ATTN:  
El Number:

\*\*\* BEP FUNDING \*\*\*

Qty	BEP Acct.	Item #	Item Description	Unit Price	Extended Amount
			TOTAL:		\$0.00

Requestor Supervisor  
Director's Office BVC Approval Fiscal Manager (Mark Pidenour)

Payment Type Order Type  
☐ Credit Card ☒ Direct Claim

Purchase Approval Form Validation Values

DRAFT-INT DELIBERATION

## **BEP Bid Process**

### **I. PURPOSE/SCOPE**

To establish consistent procedures for the solicitation of Bids for primary and secondary BEP locations.

### **II. PROCEDURES**

- A. When a BEP Vending Facility becomes available, a notice of *Vending Facility Opportunity* is sent to all Licensed Blind Vendors VIA Email. Each Blind Vendor will reply to the SLA their interest prior to the final filing date specified in the notification.
- B. Selection Process is conducted by a member of the Blind Vendors Committee (BVC) in conjunction with the BEP director and/or designee. With-in ten business days SLA will notify the Blind vendor of the award.
- C. Bid announcements for a facility shall be sent to all licensed BEP vendors within the state. Only licensed BEP vendors are eligible to Bid on an open site announcement. No individual currently enrolled in training, on provisional license status, or who does not possess a current valid full license shall be eligible to apply for an open Bid solicitation.
- D. All Bid announcements shall be sent electronically via e-mail.
- E. BEP vendors shall electronically submit Bids via e-mail directly to the BEP Director's state e-mail account as a secondary measure. The BEP Recourse Account electronic. The Bid announcement shall remain open for a period of ten (10) business days.

### **Eligibility for Bid Consideration:**

The BEP vendor is not eligible to have his Bid considered if at the time of the Bid announcement;

- 1. the BEP vendor is delinquent with respect to the filing of any reports required by the State of Delaware or is delinquent with respect to any financial obligations owed to the State of Delaware; \*
  - 2. the BEP vendor does not possess the certification required by the facility announced for Bid;
- A. After the closing of Bids and the review and certification of the BVC with respect to seniority and certification of all Bidding BEP vendors, qualified BEP vendors from those submitting Bids shall be selected to compete for the open site. The basis for this selection shall be seniority provided the BEP vendor possesses the necessary certification(s). The Agency shall contact the top candidates to determine their interest in the interview process. If one or more of these candidates decline, the BEP vendor or BEP vendors having the next greatest amount of seniority and the required certification(s) shall be selected.

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- B. After the selection process is complete, the qualified candidates shall be interviewed by a Panel consisting of the Director of the Business Enterprise Program (or designee, and the member of the BVC. Upon completion of the interview process, the successful BEP vendor shall be awarded the Bid within ten (10) working days from the date the Agency receives certification from the BVC. This verbal certification shall not be sought until after the candidates have been cleared by the Division's Fiscal Unit as eligible to interview.
- C. On the date the interviews are conducted, the SLA representative shall share with other Panel members the record of performance of the candidates to be interviewed. All information provided to Panel members including the interview is of a confidential nature and all Panel members are precluded from discussing the interview with persons outside of the Panel.
- D. Candidates shall be interviewed individually and should be prepared to answer questions posed by the interview Panel in the following areas:
  - 1. Work History
  - 2. Business Planning
  - 3. Record Keeping
  - 4. Merchandising and displaying techniques
  - 5. Handling of complaints
  - 6. Refund Policy
  - 7. Pricing Philosophy
  - 8. Dealing with competition
  - 9. Training
- E. The above are general categories and no Panel member is required to ask questions in a specific area. Panel members may ask questions in other areas as well provided that the questions do not pertain to matters relating to the BEP vendor's personal life or questions related to race, color, national origin, religion, disability, age, political affiliation or gender. IAW State Human Rights statute Tit. 19 §710, et seq. (Employment).
- F. The Panel shall rate each candidate based upon his/her records of performance (including years of service), responses received to questions, as well as personal appearance, demeanor, and attitude. To demonstrate one's record of performance, a BEP vendor who is being interviewed shall be allowed to submit letters of recommendation written on their behalf, as well as, any other documentation they would like to provide. However, it would be improper for a Committee representative or an SLA staff person to write a letter on behalf of any candidate. If in the opinion of a Panel member, two or more candidates are equal, the Panel member shall give the highest rating to the candidate possessing the greatest amount of seniority. If once a decision is made and an offer extended, the candidate elects not to accept the award, the candidate receiving the next highest rating shall be awarded the facility. In the event two candidates receive the same rating, the BEP vendor having the greatest seniority shall be awarded the facility.

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- G. In the event only one BEP vendor Bids on a vacant facility, and said vendor meets the qualifications for Bid, the SLA shall advise the BEP vendor that the facility is being awarded to them. The BEP vendor shall be given forty-eight (48) hours to either accept or reject the award. If the BEP vendor elects not to accept the award, there shall be no consequences in the way of penalties.
- H. When though the awarding of the facility may have been made, the BEP vendor must be current with respect to all financial obligations owed to the State before assuming the operation of the facility as a permanent assignment. If delinquencies are identified, the BEP vendor shall have thirty (30) days to liquidate the indebtedness. Failure to do so within the prescribed period shall result in the SLA revoking the award of the facility and proceeding to award the facility to the BEP vendor possessing the next highest rating from the interviewing Panel. If no additional BEP vendors submitted a Bid, the site shall be placed for open Bid again.

This policy shall be effective upon documented approval from the Rehabilitation Services Administration.

## Recruitment/Enrollment/Training of BEP Vendors

### I. PURPOSE/SCOPE

To establish consistent procedures for recruiting, enrolling, and training blind individuals to serve as vendors of vending facilities on federal, state, and other properties.

### II. PROCEDURES

#### Recruitment and Enrollment

The path for an individual who is blind to become a BEP licensed vendor begins with the Vocational Rehabilitation (VR) Counselor. The Division for the Visually Impaired recommends that individuals go through the VR Program to be referred to BEP. The BEP Director shall review potential candidates and communicate with the VR Counselors and clients to ensure the referral is an appropriate candidate for BEP; and if not; aid in determining what additional training or other opportunities might be better suited for the candidate.

**<sup>1</sup>Addendum 11/16: Because a BEP vendor must be able to establish credit in good standing with third-party vendors for the purchase of products; should an applicant to the BEP have a bankruptcy on their record dating back to the last five (5) years and/or a credit score of below Good Credit, the VR Counselor shall refer them to the State of Delaware's Stand By Me Program (a financial counseling program) for financial planning services. Upon the removal of the bankruptcy and/or the improvement of their credit score to at least Good Credit, they may reapply for acceptance into the BEP.**

- A. The VR Counselors make referrals of qualified clients who are interested in careers as BEP licensed blind vendors based upon the VR Unit staff's testing and certifying verification to the BEP Director. Applicants will be asked to submit an eye exam from an ophthalmologist or optometrist certifying the applicant meets the minimum eligibility as defined below:
- B. Not more than 20/200 central visual acuity in the better eye with corrective lens;
- C. An equally disabling loss of vision, as evidenced by a limitation to the field of vision in the better eye to such a degree that its widest diameter subtends an angle of no greater than 20 degrees.

Minimum 18 years of age (internships may begin as early as age 16);

**Addendum 5/11/17: Computer proficiency testing to include Microsoft Office (Word/Excel), use of e-mail, Job Access with Speech (JAWS), and any additional technology-based programs that they (the individual) might currently be using. VR Provides the Technology and the money for training. Until Blind Operator Candidate has completed. DVI provides all training in Technology prior to being**

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<sup>1</sup> Policy originally approved by RSA on 1/5/16. Policy amendments were resubmitted on 6/17

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referred. If Candidate is unable to obtain these requirements, they will receive additional training from VR and then apply to become BEP Vendor.

**Addendum 5/25/17:** A standardized interview with a DVI staff representative, an SLA representative, and two licensed blind vendors shall be conducted. In the event of a tie vote, the final decision on the candidate's viability for the program shall be decided by the Director's Office.

Credit check (Equifax, Experian, or Transunion accepted) to assure no prior defaults, bankruptcies or significant outstanding debts that would prevent the potential vendor from operating a business;

Demonstrated 8th grade math, writing, grammar, English, and reading levels as evidenced by results of standardized assessment results. If an individual does not meet these academic performance levels a meeting with the Division's Vocational Rehabilitation Unit will be scheduled to determine if remediation would be available to a potential candidate;

Review of psychological, medical, and vocational evaluations with VR Counselor, as well as a state and federal criminal background check with no confirmed felonies that would prohibit placement into a State Licensing Agency (SLA) established facility;

- A. Ability to perform the physical requirements of operating a BEP facility (reasonable accommodations apply);
- B. TB testing with confirmed negative results.

In addition to the above, the client shall be subject to a reference check and registry review as indicated below:

- [NSOPW](#) (National Sex Offender Registry Base)
- <https://pubsrv.deljjs.delaware.gov/WantedPublic/> (Delaware Criminal Justice Information System-Wanted Person Review).
- <http://dhss.delaware.gov/dhss/dltcrp/Default.aspx> (DHSS Adult Abuse Registry Check)

## Training

Training is an on-going process divided into three phases; classroom, on-the-job training (OJT), and post training.

### Classroom Training

Once the candidate successfully completes the recruitment and enrollment phases as outlined above, the BEP Director shall coordinates dates with the VR Counselor and client for the client to begin the Vendor training program through the Hadley School for the Blind ([www.hadley.edu](http://www.hadley.edu)). This training prepares the client to work in a BEP established environment and learn more about the program including an in depth understanding of the Randolph Sheppard Act, , recordkeeping, and other relevant business management practices. All Candidates will be required to attend the Hadley online course.



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Certification in ServSafe, a nationally recognized food safety course. The Hadley School for the Blind only prepares the student to take the ServSafe certification at a local facility, they do not provide the ServSafe certification directly through Hadley. This is a Requirement not an option.

### **On-The Job Training (OJT)**

OJT shall be accomplished through a minimum of 12-weeks of training funded at minimum wage rate at a set number of hours per week established in coordination with the VR program. OJT may begin after successful demonstration of completion of eight (8) out of eleven (11) of the Hadley School for the Blind module.

The BEP Director shall be engaged in the training of the following demonstrated skills and proficiencies with accommodations in place for the candidate in order to develop the candidate's skill set as a BEP operator during OJT:

- A. Independent orientation and mobility
- B. Accurate coin and bill identification with a bill reader
- C. Making correct change
- D. Working independently
- E. Communicating effectively
- F. Physical stamina

During this time frame monthly reports and meetings will be conducted with the VR counselor and candidate. In addition, during the 12-week OJT timeframe, the trainee shall learn valuable customer service skills directly from experienced licensed blind vendors or the SLA staff who operate businesses.

After a Licensee candidate completes OJT, they have a one-year probation.

After successfully completing the classroom and OJT training as well as probationary status, the trainee moves from being a "trainee" to be a certified "licensee Blind Operator, who is now eligible to apply to operate a vacant BEP location. If the trainee is unsuccessful, the BEP Director shall confer with the VR counselor to discuss the trainee's situation, and based upon mutual agreement towards the continuation or discontinuation of the trainee's participation within the program, may either extend the probationary period for an additional three (3) months, or revert the trainee back to the VR counselor for additional assessment.

### **Post Training**

This process begins after licensee-candidate certification and includes:

- A. Obtainment of a Federal Employee Identification Number (EIN) and business registration with the State of Delaware Prothonotary's Office.
- B. Establishment of a business bank account.

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- C. Application/bid procedure for a vacant location;
- D. A minimum one-year “working test” under probationary Licensee status, with the provisional vendor and SLA adhering to a mutually signed agreement of responsibilities. A provisional vendor shall practice every facet of small business operation: inventory, cash handling safeguards and procedures, acceptable accounting practices, hiring/terminating employees, payroll, purchasing, customer service, maintenance of equipment, the establishment and Maintaining of business accounts such as with Sysco, Canteen, etc..
- E. Licensed Blind Vendor status is obtained after the successful completion of the one-year probationary period.
- F. The SLA, in coordination with the Vocational Rehabilitation Unit, shall provide upward mobility training to licensees on a continuous basis, as per the Federal Regulations, 34: C.F.R. 395.11.
- G. This policy shall be effective upon documented approval from the Rehabilitation Services Administration.

## BEP Probationary Supporting Documentation Guidelines

### I. PURPOSE/SCOPE

To establish consistent procedures for both new BEP vendors on probationary status as well as current BEP vendors on disciplinary probationary status for the submission of back-up and supporting documentation to the Division's Fiscal Unit.

### II. PROCEDURES

#### General

This policy sets-forth the guidelines and requirements for the submission of required fiscal documentation to the Division's Fiscal Unit within the required established timeframes by BEP vendors either on new-vendor probationary status or disciplinary probation status. This policy is to be used as a tool to ensure that the vendor's budgetary, accounting, and financial information regarding payroll functions remains timely, easily accessible, and accurate.

Probationary vendors are required to turn in all fiscal documentation to the Division's Fiscal Unit by the tenth(10<sup>th</sup>) of every month. This shall include all receipts (cash, check, charge) for sale revenues; expenditure receipts for product, equipment, and other such related business expenditures; time sheets and other payroll documentation, other cash disbursements; and any other transaction records applicable to the Probationary vendor's business operation.

The fact that a BEP vendor may be on probationary status; be it for new vendor status or disciplinary circumstances; does not preclude the vendor from adhering to the requirement set-forth in the *BEP Accounting Practices Policy*, as excerpted, in part, below:

*"All probationary vendors will turn in their Report to the DVI fiscal officer no later than the 10<sup>th</sup> day of each month. with all corresponding source documentation as applicable (e.g. receipts, checks, bank records, financial statements). Vendors will still be required to submit their monthly reports; however, supporting receipt documentation shall not be required unless requested."*

This policy shall be effective upon documented approval from the Rehabilitation Services Administration.

## **BEP External Requests of Business Opportunities**

### **I. PURPOSE/SCOPE**

The purpose of this policy is to establish consistent procedures for review and response to external requests and inquiries for analyzing potential new business opportunities for the Business Enterprise Program (the “BEP”) to pursue.

### **II. PROCEDURES**

#### **Internal**

In addition to the State Licensing Agency (the “SLA”) reviewing potential business opportunities for the BEP Blind Vendors Committee (the “BVC”) to consider for new business pursuit, there are occasions when external entities such as the general public, advocates, and state officials forward potential new business requests and inquiries for consideration and feedback. In these circumstances, the following process shall be followed and adhered to.

- A. The Director and/or Deputy Director of The Division for the Visually Impaired (“DVI”) receives information from an external entity with a potential new business opportunity (each a “Business Opportunity”) for the BEP to analyze and/or pursue.
- B. The DVI Director and/or Deputy Director forwards the information to the DVI employee designated as the Division point-of-contact for BEP Business Opportunities (the “POC”) for analysis.
- C. The POC thoroughly reviews the information relating to the Business Opportunity and gathers any necessary ancillary information pertaining to the requirements of the project.
- D. The POC then forwards the information relating to the Business Opportunity to the BVC and the BEP Director with a brief synopsis of the scope of work entailed, the requirements of the project, and any other information pertaining to the Business Opportunity for their review.
- E. Unless a later deadline is specified by the POC, the BVC shall respond to the POC within Three (3 2) business days as to whether they recommend that the BEP pursue the Business Opportunity. For the BVC to recommend pursuit of the Business Opportunity, at least two (2) members of the BVC must vote in favor of such a recommendation.

### **III. PROCEDURES**

#### **External Response**

Upon response to the POC by the BVC with a recommendation, the POC shall perform the following functions:

- A. The POC shall develop a spreadsheet with the date of receipt of the request, the title of the proposed Business Opportunity, bid number if applicable, due date of project, a brief description of the Business Opportunity, and the recommendation of the BVC with a brief synopsis as to the BVC's decision should they reject the proposed Business Opportunity. This spreadsheet shall be maintained on the DVI shared file drive for employee access.
- B. The POC shall forward the comments of the BVC to the DVI Director and Deputy Director within three (3 2) business days of receipt for response back to the external requesting entity.
- C. The POC shall ensure maintenance of the spreadsheet for the DVI Director and Deputy Director to have as a presentation mechanism to any interested parties.
- D. Should the BVC recommend pursuit of a given Business Opportunity, the POC shall begin the process of formulating a proposal response for submission to the applicable entity and arrange for the attendance to any required meetings or other submission requirements. The POC shall engage the SLA, the BVC, the Director's Office, and any other entity throughout the process conducive to the successful response to said project entity.

Attached hereto are excerpts of certain applicable provisions of the Randolph-Sheppard Act.

#### **Randolph-Sheppard Act Excerpts:**

Elected Committee Mandate & Active Participation Mandate

#### **34: C.F.R. § 395.14The State Committee of Blind Vendors.**

(a) The State licensing agency shall provide for the biennial election of a State Committee of Blind Vendors which, to the extent possible, shall be fully representative of all blind vendors in the State program on the basis of such factors as geography and vending facility type with a goal of providing for proportional representation of blind vendors on Federal property and blind vendors on other property. Participation by any blind vendor in any election shall not be conditioned upon the payment of dues or any other fees.

(b) The State Committee of Blind Vendors shall:

(1) Actively participate with the State licensing agency in major administrative decisions and policy and program development decisions affecting the overall administration of the State's vending facility program;

(2) Receive and transmit to the State licensing agency grievances at the request of blind vendors and serve as advocates for such vendors in connection with such grievances;

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- (3) Actively participate with the State licensing agency in the development and administration of a State system for the transfer and promotion of blind vendors;
- (4) Actively participate with the State licensing agency in the development of training and retraining programs for blind vendors; and
- (5) Sponsor, with the assistance of the State licensing agency, meetings and instructional conferences for blind vendors within the State.

#### **34: C.F.R. § 395.3 Application for designation as State licensing agency; content.**

(a) An application for designation as a State licensing agency under § 395.2 shall indicate:

- 4) The methods to be used to ensure the continuing and active participation of the State Committee of Blind Vendors in matters affecting policy and program development and administration.

#### **34: C.F.R. § 395.7 The issuance and conditions of licenses.**

(a) The State licensing agency shall establish in writing and maintain objective criteria for licensing qualified applicants, including a provision for giving preference to blind persons who need employment. Such criteria shall also include provisions to assure that licenses will be issued only to persons who are determined by the State licensing agency to be:

- (1) Blind;
  - (2) Citizens of the United States; and
  - (3) Certified by the State vocational rehabilitation agency as qualified to operate a vending facility.
- (b) The State licensing agency shall provide for the issuance of licenses for an indefinite period but subject to suspension or termination if, after affording the vendor an opportunity for a full evidentiary hearing, the State licensing agency finds that the vending facility is not being operated in accordance with its rules and regulations, the terms and conditions of the permit, and the terms and conditions of the agreement with the vendor.

(c) The State licensing agency shall further establish in writing and maintain policies which have been developed with the active participation of the State Committee of Blind Vendors and which govern the duties, supervision, transfer, promotion, and financial participation of the vendors. The State licensing agency shall also establish procedures to assure that such policies have been explained to each blind vendor.

#### **34: C.F.R. § 395.9 The setting aside of funds by the State licensing agency.**

(a) The State licensing agency shall establish in writing the extent to which funds are to be set aside or caused to be set aside from the net proceeds of the operation of the vending facilities and, to the extent applicable, from vending machine income under § 395.8(c) in an amount determined by the Secretary to be reasonable.

(b) Funds may be set aside under paragraph (a) of this section only for the purposes of:

- (1) Maintenance and replacement of equipment;
- (2) The purchase of new equipment;
- (3) Management services;
- (4) Assuring a fair minimum of return to vendors; or
- (5) The establishment and maintenance of retirement or pension funds, health insurance contributions, and provision for paid sick leave and vacation time, if it is so determined by a majority vote of blind

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vendors licensed by the State licensing agency, after such agency provides to each such vendor information on all matters relevant to such proposed purposes.

(c) The State licensing agency shall further set out the method of determining the charge for each of the above purposes listed in paragraph (b) of this section, which will be determined with the active participation of the State Committee of Blind Vendors and which will be designed to prevent, so far as is practicable, a greater charge for any purpose than is reasonably required for that purpose. The State licensing agency shall maintain adequate records to support the reasonableness of the charges for each of the purposes listed in this section, including any reserves necessary to assure that such purposes can be achieved on a consistent basis.

This policy shall be effective upon documented approval from the Rehabilitation Services Administration. 28 January 2015 12 June 2020

## **Blind Entrepreneur Program Grievance Policy**

### **I. PURPOSE**

To establish consistent and clearly defined procedures for licensed BEP Operators to file a complaint with action taken by the Division for the Visually Impaired, Blind Entrepreneur Program arising from the operation or administration of the vending facility program.

### **II. SCOPE**

This policy applies to all licensed BEP operators.

### **III. BACKGROUND**

The Federal Code of Regulation Part - 395.13 requires the state licensing agency to specify in writing and maintain procedures whereby such agency affords an opportunity for a full evidentiary hearing to each blind vendor. In addition to 395.14 (b), (2) whereas the state committee of blind vendors shall receive and transmit to the state licensing agency grievances at the request of blind vendors and serve as advocates for such vendors in connection with such grievances. This policy shall replace State Rules & Regulations #13 Evidentiary Hearings and Arbitration of Vendor Complaints.

### **IV. PROCEDURES**

- A. A licensed operator and the elected committee of blind vendor shall be afforded the opportunity to file a grievance if they are dissatisfied with action taken by the Division for the Visually Impaired, Blind Entrepreneur Program arising from the operation or administration of the BEP.
- B. The licensed operator shall send their complaint in writing to the elected committee of blind vendors within (15) calendar days of the action giving rise to the complaint. The complaint shall specify the item being grieved.
- C. The elected committee of blind vendors must forward to the Division for the Visually Impaired Blind Entrepreneur Program Director with a recommendation for its resolution.
- D. The recommended resolution by the committee shall be sent to the Blind Entrepreneur Program Director and the grievant within (10) calendar days of receipt of the notice of complaint.

### **ADMINISTRATIVE REVIEW EVIDENTIARY HEARING**

- A. If the complaint is not resolved in writing to the satisfaction of the grievant within (30) calendar days of receipt of the recommended resolution, the grievant shall request an informal administrative review evidentiary hearing with the Division for the Visually Impaired Director or his/her designee within (10) calendar days. The informal administrative review evidentiary



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hearing shall be held during normal Division working hours at the main office or a place designated by the DVI Director. The purpose of an informal administrative review is to allow the grievant a quick means for resolving dissatisfaction arising from the operation or administration of the BEP.

- A. The time and place of the administrative review will be scheduled within (30) calendar days of receipt for requesting an administrative review.
- B. The administrative reviewer shall prepare brief findings of fact, conclusion and recommendations no later than (45) calendar days after the conclusion of the review. The findings shall be sent to all parties.
- C. The determination from the Blind Entrepreneur Program Director on the findings shall be sent to all parties within (15) calendar days of receipt of the findings.

### **FULL EVIDENTIARY HEARING**

- A. When the informal review does not resolve the dispute to the satisfaction of the grievant, such grievant shall request a full evidentiary hearing within (30) calendar days.

### **PROCEDURES**

- A. The full evidentiary hearing will be conducted by a hearing officer. The hearing officer will be an impartial official who is not involved either with the Blind Entrepreneur Program, licensed operators or the elected committee of blind vendors on issues with the administration or operation of the Blind Entrepreneur Program.
- B. The selection of a hearing officer shall be agreed upon by the Division for the Visually Impaired Blind Entrepreneur Program and the grievant within (10) calendar days of notice for a full evidentiary hearing. If a hearing officer cannot be agreed upon between the parties, the Director of the Division for the Visually Impaired or his/her designee shall select a hearing officer on the party's behalf.
- C. Reader services, if needed will be requested at least (15) calendar days prior to the hearing date.
- D. The time and place of the full evidentiary hearing will be set by the hearing officer during the division's normal business hours. The hearing officer will notify all parties of the time and place at least (30) calendar days prior to the hearing.
- E. The person bringing the complaint shall have the burden of proving their case by the preponderance of evidence. The persons bringing the complaint shall present their evidence first.
- F. The hearing officer shall issue a written report which will set forth the issues, and relevant facts from the hearing and the applicable provision of applicable laws, the Randolph-Shepherd Act,

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State Rules & Regulations, and Policies and Procedures. The report shall contain findings of fact and Conclusion with respect to each of the issues and make available to all parties no later than (30) calendar days of the conclusion of the hearing.

- G. The hearing officer in determining their conclusion, shall be limited to determine whether the Division for the Visually Impaired, Blind Entrepreneur Program actions violated applicable Laws, The Randolph-Shepherd Act, State Rules and Regulations, or Policies and Procedures.
- H. Should the hearing officer find that the actions of the Division for the Visually Impaired, Blind Entrepreneur Program violated applicable Laws, The Randolph-Shepherd Act, State Rules and Regulations, or Policies and Procedures, the hearing officer may also recommend action necessary to correct the violation
- I. The Blind Entrepreneur Program Director shall review the findings of the hearing officer and forward a decision to all parties no later than (7) calendar days after receipt of findings.

## **ARBITRATION**

- A. If the grievant is dissatisfied with the decision of the hearing officer or the Blind Entrepreneur Program Director, the grievant must file a complaint with the Secretary Of Education no later than (30) calendar days after receipt of such decision in accordance with provisions of section 395.13 of the act.
- B. If Blind Operator is not satisfied without come operator may Request Arbitration under the provisions of 34 CFR 395.13.
- C. The filing of a complaint either the State licensing agency or the secretary shall indicate consent by the blind vendor for the release of such information as is necessary for the conduct of a full evidentiary hearing or the hearing of an ad hoc arbitration panel
- D. The arbitration panel convened by the Secretary to hear the grievance of blind vendors shall be composed of three members appointed as follows:
  - a. One individual designated by the state-licensing agency.
  - b. One individual designated by the blind vendor; and
  - c. One individual not employed by the state-licensing agency or, where appropriate, its parent agency, which shall be jointly designated by the other members of the panel and who, shall serve as chairman of the panel.
- E. If either the state licensing agency or the blind vendor fails to designate a member of an arbitration panel, the Secretary shall designate such member on behalf of such parties.
- F. The decision of an arbitration panel convened by the Secretary under section 395.13 shall be matters of public record and shall be published in the federal register.

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- G. The Secretary shall pay all reasonable costs of arbitration under section 395.13 in accordance with a schedule of fees and expenses, which shall be published in the federal register.
- H. The provisions of section 395.13 shall not require the participation of grantors of permits for the operation of vending facilities on property other than federal property.

This policy shall be effective immediately following RSA approval.

\_\_\_\_\_  
ROB A. SCHMIDLKOFER  
Director  
Blind Entrepreneur Program

\_\_\_\_\_  
DATE

\_\_\_\_\_  
WAYNE MARSH  
Committee Chairperson  
Blind Operator Committee

\_\_\_\_\_  
DATE

# INSTRUCTIONAL MATERIALS AND RESOURCE CENTER

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## Mission

The DVI Instructional Materials and Resource Center promotes literacy and provides supports by producing and providing textbooks, books, and educational materials in accessible formats.

## Scope

Braille Transcription  
Embossing Braille  
Tactile Graphics  
Reproduction of Braille and Tactile Graphics  
Large Print Production  
Digital formats and Large Type Production  
Equipment  
Instructional Tools  
Consumable Items

## Purpose

The IMRC produces and provides specialized educational materials and services that are part of the student's core curriculum and expanded core curriculum (including the items identified in the student's Individualized Educational Plan) to help enable the K12 student to function independently and participate as part of a group whether it be in the classroom, at home, or another functional or community setting.

The educational materials provided are in an accessible format used by the student such as braille, large print, large type, and digital (electronic) formats.

In addition to the educational material, the IMRC also provides specialized tools and equipment to help the student access the material and consume the information within it.

These devices also help the student contribute to the lesson(s).

The non-consumable items (books, materials and equipment) are part of the IMRC's large repositories at DVI and loaned to the student and returned to the repository so that it may be loaned out to another student as quickly and efficiently as possible.

## Overview

Requests are made to the IMRC electronically (either internally or externally) for the provision of the following the following materials and/or services:

- Braille Transcription
- Embossed Braille
- Tactile Graphics
- Reproduction of Braille and Tactile Graphics
- Large Print
- Digital formats and Large Type rendered accessible for 21<sup>st</sup> century assistive technologies

- Equipment
- Instructional Tools
- Consumable Items

The IMRC primarily serves the DVI clients currently active within the DVI Education Program.

#### Request for Materials

Requests for this population are made through a portal that is made available for approved Digital Rights Managers (DRMs) throughout the State of Delaware at the following address:  
<https://www.aimdelaware.org>

Requests through this portal are funneled to the IMRC where the request is further processed to fulfill the order.

IMRC staff check the portal daily for new requests/orders placed by the statewide DRMs.

The Senior Librarian, upon receipt of the request, shall contact the requestor within five business days to ensure that all the required information has been collected and submitted on the request form in order for the IMRC to move forward with fulfilling the request.

If additional information is needed, the request will be placed in a pending state until the IMRC can move forward with fulfilling the order.

Some requests are for materials that are currently in the IMRC repository and will be pulled from inventory and signed out to the student.

If the material needs to be produced in an alternate format (braille, large print, etc.), the IMRC handles the production of this format. The item is added to the inventory of the IMRC repository and then deployed to the student for use.

At times some items may be obtained from a third party. Acquisition from such entities may require additional approval from the Statewide Coordinator for Educational Services.

When the student is finished using the loaned materials for its intended use (while active on the DVI Education caseload) the items are to be returned to the IMRC so that they may be available for sign-out to another student.

All items in the IMRC repositories remain the property of the DVI education program for future use by a student or Itinerant Teacher.

As time and resources permit the IMRC may produce braille and large print versions of administrative materials for DVI usage.

In some cases, the requestor may be billed due to the cost of producing the materials in the alternate format. The requestor will be given a cost estimate prior to production.

### ***IMRC Request Forms***

The IMRC has forms used in-house by DVI staff to fulfill requests for books, materials and equipment for instructional purposes:

- Media Request Form
- Equipment Request Form

These forms are used to collect data that is incorporated into the production or acquisition of the required format, equipment or some other form of assistive technology.

The IMRC request forms are to be submitted electronically to the IMRC general mailbox:

[DVI IMRC@delaware.gov](mailto:DVI_IMRC@delaware.gov)

If the IMRC receives a request for an item that may incur a cost, then approval from the Information Systems Support Specialist and/or the Statewide Coordinator for Educational Services must be obtained prior to the acquisition of the item.

### ***IMRC Requests for Consumables and Items that will not be returned to the IMRC***

An inventory of consumables (example: specialized papers, writing instruments, and specialized tools) are available for teachers to sign out from the IMRC Inventory. These consumables are logged and used to replenish inventory levels.

### **Braille Transcription**

The IMRC provides braille transcription services so that a braille version of the content can be accessed either on paper or devices mentioned above.

The IMRC Media Request form contains the information that the IMRC needs in order to transcribe the content into braille and provide it in the medium needed by the end user.

Requests for DVI K12 students are the IMRC's number one priority. Requests for third parties are handled as time and resources permit so long as there is no negative impact on the production and delivery of braille to the students served by DVI.

### **Embossing Braille**

The IMRC produces educational and instructional materials for tactile access. Generally, the IMRC produces and provides a paper copy of a braille document also known as "hard copy braille".

### **Tactile Graphics**

The IMRC has specialized braille embossers and equipment to create tactile maps, diagrams, text and graphics.

Determining how to represent tactile images is important to ensure a comprehensive learning experience.

The complexity of the information to be conveyed from the image or graphic will help determine whether the output would be more beneficial in one format over another.

There are a variety of techniques that exist which the IMRC can use to produce images in a tactile format – all which rely on the learning objectives of the image.

### Reproducing Braille Text and Tactile Graphics

The IMRC has specialized equipment used in replicating hardcopy braille and tactile graphics. This method results in permanent and inexpensive teaching aids and braille copies from a single master.

### Large Print Production

The IMRC strives to serve as a resource to produce and provide enlarged print and content for readers who are faced with low vision.

The IMRC may work with designated resources, including volunteers, to accomplish a successful outcome concerning the reproduction of the material in an enlarged format.

### Digital Formats and Large Type Production

Occasionally, enlarged content on print is not needed by the end user. Instead, a digital version of the content may need to be customized to meet the needs of the student with low vision. This customized version may be provided on hardcopy paper or provided in a digital format that the student will access using a device or some combination of access technology.

### Equipment

The IMRC has a repository of products that cover a broad spectrum of needs for people who are visually impaired, blind and deaf-blind.

These products are designed for infants, preschoolers, and students both in education and daily living.

The IMRC has a great number of items for students and teachers that fall in the below categories:

- Early Childhood
- Core Curriculum
  - English Language Arts
  - Mathematics
  - Science and Health
  - Social Studies: History, Geography, and Economics
  - Fine Arts
  - Business and Vocational Education
  - Physical Education



- Expanded Core Curriculum
  - Communication Modes and Literacy Education
  - Visual Efficiency and Low Vision
  - Orientation and Mobility (Concept Development)
  - Assistive Technology and Electronics
  - Career Education and Transition
  - Self-Determination
  - Daily Living and Social Interaction
  - Recreation and Leisure

#### Instructional Tools

The IMRC has a variety of professional tools in our repository used by Teachers for the Visually Impaired, Trainer / Educators, and in some cases, family members.

Items include, but are not limited to:

- Assessment Tools and Kits
- Instructional and Informational Videos
- Resources for Parents and Professionals

#### Consumable Items

The IMRC has a variety of writing instruments, specialty papers, tools to create tactile graphics, special adhesives, pocket folders, binders, activity and work books, and other consumable (sometimes referred to as “disposable”) items that DVI does not expect to be returned to the IMRC repository.

## Outline for Consumer Policies

1. General Administration
  - a. Accessible Communication
  - b. Accessing Interpretation Services
  - c. Case Documentation
  - d. Case Record Review
  - e. Confidentiality & Informed Consent
  - f. Grievances
  - g. Input (includes satisfaction surveys)
  - h. Outcome Management
  - i. Participant Record Maintenance & Storage
  - j. Record Retention
  - k. Rights of Person Served (include rights to records)
  - l. Storage of Client Records
  - m. Client's Rights to Records
  - n. Informal/Formal Review Process and Mediation
  - o. Communication of Policies
  - p. Exceptions to Policies
  - q. Coordination with Advisory Councils and Boards
  - r. Coordination with Community Partners
  - s. Coordination with Client's Family Members or Advocates
  - t. Interns and Volunteers
  - u. Staff Acting as a Family Member's Advocate Conflicts of Interest
  - v. Coordination of Services (Case Management)
  - w. Client Transportation
  - x. Memorandum of Understanding Development and Review
  - y. Wait List
2. Outreach and Referral (includes self-referral)
  - a. Outreach and Marketing
  - b. Referral Response & Processing
3. Intake, Eligibility and Admissions
  - a. Intake and Admissions
  - b. Eligibility
  - c. Consumer Orientation
4. Vocational Rehabilitation – Current policies are being updated with assistance from consultant
5. Education - All current education policies and the following
  - a. Client Expectations (includes failure to cooperate)
  - b. Service Standards

Division for the Visually Impaired  
Policy and Procedures Format

- c. Service Time Frames
  - d. Qualifications and Requirements for Performing Assessments
  - e. Case Management (opening, closing, re-opening, inactive)
  - f. Closing and reopening cases due to "Failure to Cooperate"
  - g. Coordination with the State's Department of Education (includes school districts)
  - h. Develop and implement communication and procedure guidelines regarding DVI services for students in local school districts.
  - i. Develop a policy for education services from DVI to DOE.
  - j. Develop a clear policy outlining the Individualized Education Program (IEP) process and protocol for blind and visually impaired students. This policy should include procedures and timeframes required for DOE and its districts to notify DVI of students with blindness or visual impairments.
- 6. Orientation & Mobility - All current O&M policies (separate from Education) and the following
  - a. Client Expectations (includes failure to cooperate)
  - b. Plan Development
  - c. Service Standards
  - d. Service Time Frames
  - e. Qualifications and Requirements for Performing Assessments
  - f. Case Management (opening, closing, re-opening, inactive)
  - g. Closing and reopening cases due to "Failure to Cooperate"
- 7. Technology Training - All current Tech Training policies and the following
  - a. Client Expectations (includes failure to cooperate)
  - b. Plan Development
  - c. Service Standards
  - d. Service Time Frames
  - e. Qualifications and Requirements for Performing Assessments
  - f. Case Management (opening, closing, re-opening, inactive)
  - g. Closing and reopening cases due to "Failure to Cooperate"
- 8. Independent Living Services - All current ILS policies and the following
  - a. Client Expectations (includes failure to cooperate)
  - b. Plan Development
  - c. Service Standards
  - d. Service Time Frames
  - e. Qualifications and Requirements for Performing Assessments
  - f. Case Management (opening, closing, re-opening, inactive)
  - g. Closing and reopening cases due to "Failure to Cooperate"
- 9. Informational Material Resource Center - All current IMRC policies and the following
  - a. Client Expectations (includes failure to cooperate)
  - b. Plan Development
  - c. Service Standards

Division for the Visually Impaired  
Policy and Procedures Format

- d. Service Time Frames
  - e. Qualifications and Requirements for Performing Assessments
  - f. Case Management (opening, closing, re-opening, inactive)
  - g. Closing and reopening cases due to “Failure to Cooperate”
  - h. Technology Management
10. Comprehensive Fiscal Management (could include payment for services and fee schedule)
- a. RSA fiscal management and reports - VR
  - b. RSA fiscal management and reports – Older Blind
  - c. State fiscal management and reports

# DVI HOLDOVER 2021 Appendix G

**Partnership Agreement**  
between  
**Georgetown Public Library**  
and  
**Delaware Division for the Visually Impaired**  
to provide  
**Community-based Assistive Technology Training for the Blind**

## I. Purpose

This Partnership Agreement (PA) between the Georgetown Public Library and the Division for the Visually Impaired (DVI) serves to establish a cooperative partnership. The partnership is designed to increase access to assistive technology (AT) training and support to the blind and visually impaired community.

## II. Overview

DVI provides people who are blind and visually impaired access to statewide technology centers where they can work with a Technology Trainer to evaluate AT equipment and training needs. The current Sussex County training center is located within a state office campus that is inaccessible to fixed route public transportation. The Georgetown Public Library provides DVI the opportunity to expand access in Sussex County because of its proximity to public transportation. In addition, the partnership promotes full immersion and community inclusion.

## III. Roles and Responsibilities

The Georgetown Public Library will:

- Allow DVI to conduct individualized AT training in the library at the second-floor reference desk (primary) and/or in private classrooms (secondary) at no cost.
- Allow DVI to occasionally conduct group training in larger rooms at no cost.
- Coordinate dates and times the space and rooms are available with DVI staff.
- Allow DVI to install a CCTV on the second-floor reference desk for training purposes.
- Allow DVI to install screen reading software on the computer on the second-floor reference desk.
- Allow DVI to utilize the large screen television for Zoom Text training.
- Provide a storage cabinet with a lock or allow DVI to provide a storage cabinet with a lock near the second-floor reference desk.
- Allow DVI to store materials and equipment in the locked storage cabinet.
- Promote partnership publicly via website, social media and media blasts (if applicable)

DVI will:

- Coordinate dates and times the space and rooms are needed for AT training with library staff.
- Provide a storage cabinet with a lock if one is not available for use at the library.
- Provide all equipment and materials for AT training.
- Assist the library to access or update screen reader software on at least one public computer.
- Provide an on-site accessibility evaluation of the entire library and make recommendations to improve access (i.e. add Braille markers to end caps and elevators).
- Provide library staff with blindness sensitivity training for use with the public.
- Provide library staff with training for screen readers, Zoom text and CCTV so they can promote and assist the public.
- Allow the library to utilize the CCTV and Zoom text for library members with visual impairments.
- Promote library events and services to all trainees and DVI consumers.

- Promote partnership publicly via website, social media and media blasts (if applicable)

#### IV. **Stored Equipment Clause**

DVI and the library agree that the equipment stored in the locked cabinet is the property of DVI and the library is not responsible for misplaced, lost, stolen, or broken equipment.

#### V. **Amendment(s)**

This agreement may be amended at any time upon mutual consent of the parties. Any amendment must be in writing and signed and dated by the parties.

#### VI. **Termination**

Either Party may terminate the PA with thirty (30) days written notice.

#### VII. **Severance Clause**

If any part of this PA becomes unenforceable or illegal, the agreement will continue in force with the problem provision(s) severed from the agreement.

#### VIII. **Non-discrimination**

The Parties will not deny services to or otherwise discriminate in the delivery of services to any person who otherwise meets the eligibility criteria based on race, color, religion, sex, age, sexual preference, national origin, ancestry, disability, or financial hardship.

#### IX. **Term**

This agreement shall be effective from November 1, 2020 through October 31, 2021. The parties, upon mutual consent and in writing, may renew this agreement for any number of two-year extensions.

#### **Georgetown Public Library**

DocuSigned by:

*Lesley Koble*

10/30/2020 | 1:56 PM EDT

Lesley Koble, Executive Director

Date

Georgetown Public Library

#### **Delaware Division for the Visually Impaired**

DocuSigned by:

*Sandra J Miller*

10/30/2020 | 2:49 PM EDT

Sandra J. Miller, Division Director

Date

Delaware Division for the Visually Impaired

#### **Delaware Department of Health & Social Services**

DocuSigned by:

*Lisa Bond*

10/30/2020 | 4:14 PM EDT

Lisa Bond, Deputy Secretary

Date

Delaware Department of Health & Social Services

## DVI HOLDOVER 2021 Appendix H

DVI will take the following steps to develop goals and priorities mutually agreed upon by the State Rehabilitation Council and DVI.

- I. Constitute a State Rehabilitation Council (SRC) in compliance with regulations at 34 C.F.R. § 361.17.
  1. Identify membership issues and begin plan to correct so SRC is in compliance with federal regulations in 34 C.F.R. § 361.17 by October 15, 2020.
    - a. Identify members whose appointments are not in compliance.
    - b. Consult with the Secretary of the Department of Health and Social Services, State Attorney General, Office of Boards and Commissions and the Office of the Governor to discuss members who were:
      - i. Actively serving on the SRC when not appointed.
      - ii. Operating out of compliance with federal term limitations.
    - c. Work with the SRC chair to request members submit appointment documentation so DVI can cross-reference to validate their service to the SRC.
    - d. Request resignation or request Governor's office remove SRC members who are out of compliance with term limits.
  2. Develop member recommendations and submit to the Governor of Delaware between October 15, 2020 and December 30, 2020.
    - a. Determine the number of vacancies and positions in need of new candidates.
    - b. Work with remaining and past SRC members to assist with recruiting suggestions.
    - c. Work with national partners and other state blind agencies to identify creative and effective recruitment strategies.
    - d. Conduct outreach to the DVI blind registry, other state agencies, business community and other stakeholders (Community Rehabilitation Providers, WIOA partners, SILC, Business Partners, Client Registry) to identify individuals who meet the requirements and who are interested in acting in an advisory role to DVI's VR program.
    - e. Submit list of membership recommendations: Coordinate with the Office of Boards and Commissions regarding federal requirements in 34 C.F.R. § 361.17 and assure members are appointed in a timely manner and on a staggered basis.
    - f. Install new SRC members.
      - i. Conduct member orientation.
      - ii. Review information in the orientation and training manual.
3. Develop comprehensive policy and procedures for coordination with SRC in accordance with federal regulations in 34 C.F.R. § 361.17(h) by April 1, 2021.
  - a. Policy to include: DVI and SRC partnership, SRC composition, recruitment, member orientation & training, member tracking, SRC activities, reporting, and resources.
  - b. Review policy with SRC and obtain input.
  - c. Post policy for public comment.
4. Ensure SRC members and DVI staff are properly trained on roles and responsibilities as described in 34 C.F.R. § 361.17(h) by September 30, 2021.
  - a. Develop an SRC member orientation and training manual.
    - i. Create an orientation and training checklist to ensure consistency among members.
    - ii. Coordinate with NCSRC and George Washington University.
    - iii. Coordinate with the Delaware Deputy Attorney General's office.
    - iv. Provide all members with the *State Rehabilitation Council Vocational Rehabilitation Partnership – Under WIOA* publication (most recent edition).
    - v. Comprehensive Statewide Needs Assessment (CSNA) training.

- b. Work with the SRC to develop a plan for ongoing training to ensure all members participate according to federal regulations in 34 C.F.R. § 361.17(h) as an entire entity.
  - c. Create a system to track new member orientation and ongoing training events.
  - d. Review and revise the DVI Training policy to include training developed for the SRC for VR employees and new hires.
- 5. Develop a record-keeping and monitoring system to track SRC appointments and ensure compliance with federal regulations in 34 C.F.R. § 361.17 by December 30, 2020.
  - a. Identify a DVI point of contact to work with the SRC chair and office of boards and commissions:
    - i. Create a system to track appointments, expirations and SRC participation.
    - ii. Coordinate appointments to the SRC.
    - iii. Perform semi-annual reviews of SRC participation.
    - iv. Request semi-annual appointment lists to compare against appointment letters.

## II. Conduct the Comprehensive Statewide Needs Assessment (CSNA) with the SRC as described in 34 C.F.R. § 361.

- 1. Work with the SRC to develop a plan for CSNA design and implementation by February 15, 2021.
- 2. Explore conducting the CSNA with the Delaware general VR (DVR) and the general SRC.
  - a. Consider contracting with the University of Delaware Center for Disabilities Studies to conduct the CSNA.
  - b. Utilize the [\*Developing a Model Comprehensive Statewide Needs Assessment With Corresponding Training Materials For State VR Agency Staff and SRC Members: The VR Needs Assessment Guide\*](#) (the Guide).
- 3. Develop a timeline of CSNA for each of the following steps from the Guide.
  - a. Defining and Establishing CSNA Goals with the SRC.
    - i. Review existing data and most recent CSNA.
    - ii. Define a list of goals utilizing examples of data sources from the Guide.
  - b. Develop CSNA Plan for information and dissemination
    - i. Create a workplan, timeline and resource estimate.
    - ii. Design a plan specifically for dissemination
  - c. Gathering the Information
    - i. Obtain secondary data
    - ii. Survey VR counselors
    - iii. Survey VR consumers
    - iv. Focus groups
    - v. Key informant interviews
    - vi. Community hearings
- 4. Develop an implementation team with the SRC.
  - a. Points of contact from all involved entities
  - b. Develop expectations for the implementation team including communication, coordination and responsibilities.

## III. Review findings derived from the CSNA with the SRC by September 15, 2021.

- 1. Analyze results and develop findings
  - a. Review and analyze survey data, relevant literature and state reports, focus groups, hearings, stakeholder comments, etc.
- 2. Develop conclusions and action strategies.
  - a. Review results
  - b. Develop recommended goals and priorities.

## IV. Conduct sessions with the SRC to jointly develop goals and priorities by December 1, 2021.



1. Work with the SRC to utilize CSNA recommendations to create comprehensive state plan, goals, priorities and strategies.
2. Publish plan for public comment.
3. Disseminate the CSNA findings to all DVI stakeholders.

V. Submit modified description I of the DVI VR portion of the Delaware WIOA State Plan March 1, 2022.

1. Revise section I.1 to describe that the goals and priorities were jointly developed and agreed to by DVI and the SRC.
2. Update section I.2 with goals and priorities derived from the CSNA in conjunction with the SRC.