

Administrative Guidance:

Managing and Leveraging Resources

A critical part of successfully implementing a Section 4 funded State AT Program is ensuring the best use of Section 4 AT Act grant award dollars to support State AT Program activities along with leveraging additional resources to support more robust and comprehensive services.

Managing AT Act Resources

State AT Programs should strive to ensure that the vast majority of Section 4 AT Act funding is allocated to support activities that directly increase access to and acquisition of AT rather than to administrative or overhead costs. State AT Programs vary in their administrative structures with some functioning as an autonomous AT organization and others operating as part of a larger agency or organization. Except for those State AT Programs that are non-profit agencies with only an AT function, there is typically a delicate balance that needs to be found to allow the State AT Program to be a valued part of the larger administrative organization while still implementing equitable comprehensive and statewide AT activities as required by the AT Act.

It is not uncommon for State AT Programs to be asked to provide services that benefit their administrative home agency at a level disproportionate to services available for others. The AT Act does include a requirement that “grant funds will be used to supplement and not supplant funds available from other sources . . .” which is helpful in explaining to administrative agencies the need for some degree of autonomy of the State AT Program to ensure that grant funds are not supporting services that should be funded by the larger agency and AT Act resources do not supplant other agency responsibilities and/or funding.

The AT Act is also clear in limiting indirect costs to 10% which suggests that the other 90% of the grant award should be used to implement the authorized activities of the AT Act rather than administrative or overhead costs. State AT Programs should have a robust system of tracking and reporting expenditure data to ensure the maximum amount of Section 4 AT Act dollars support AT Act authorized activities. (A separate *Administrative Guidance: Expenditure Tracking and Reporting* document provides additional information on tracking expenditures by state level and leadership activities as is required by the AT Act.)

Leveraging Additional Resources

State AT Programs should continuously surveil the landscape within their state for opportunities to engage with other public and private agencies to expand access to and acquisition of AT through leveraged resources. The small core federal AT Act funding is simply insufficient to support truly comprehensive services across most states and territories without significant partnerships that leverage additional resources.

The basic steps in successfully leveraging funding include:

- Identifying who could provide leveraged funding and for what specific purpose(s);
- Conceptualizing and sharing what the State AT Program can provide that will deliver jointly beneficial outcomes to both the potential partner and State AT Program (this may include estimated costs and anticipated return on investment); and
- Being persistent and flexible in working toward a mutually beneficial agreement.

It is critical for every State AT Program Director to have a clear idea of what their program has to offer that is valuable to others along with a realistic view of their program capacity. For example, does your program have the administrative capacity to expand services and directly provide AT via application process? Do you have the physical space to expand device inventory and double the number of device loans processed each year? Is your program easily able to restructure (recruit/add qualified staff or reassign staff duties) to accommodate additional funding for specific activities even if only for a limited time period?

There are two basic types of funding that State AT Programs leverage, entering into agreements for a set of services/deliverables with prescribed total payment or establishing a fee schedule for services provided on an as needed/requested basis. There may be hybrid approaches that use features of each. The following provides an overview of these two types of leveraged funding and how they are typically implemented.

Service Agreements – Contracts/MOUs or other agreements for specific services.

- Scope and volume of services to be provided is for a set time period.
- Can be one-time agreement or can have renewal periods to support long term implementation.
- Total payment amount is specified, supports budgeting with predictable income.
- Most typically used to implement targeted activities within an area, (e.g. AT for post-secondary open ended loan project or administering a telecommunications equipment distribution program).

Fee-for-Service – Piece rate schedule of payments for specific services.

- Ad hoc volume based on need/requests.
- Can be one time or ongoing.
- Individual service amount is specified; creates need to project volume for budgeting; history of past usage is helpful to accurately estimate income for budgeting.
- Most typically used for individual client services (assessments or consultations) or requests for specially-developed training with fees set to cover all associated expenses.

Types of Resources

State AT Programs support statewide AT access and acquisition across all ages and all types of disabilities which creates a wide array of opportunities for leveraging funding. The following areas are those most frequently providing leveraged funding opportunities for State AT Programs.

Special Education:

The major federal funding stream for special education is the Individuals with Disabilities Education Act (IDEA) Part C for children with disabilities birth to age 3 and Part B for children with disabilities age 3-21. IDEA Part B funding is allocated to the state education agencies according to a formula. In most states about 75% to 80% of IDEA funds are

allocated to local school districts under a formula and the rest are retained by the state for discretionary uses. IDEA does include a requirement for coordination and collaboration with the State AT Program. Federal special education funding is actually quite small compared to state and local special education funding in almost all states, creating additional options for leveraging funding.

Examples of AT Act authorized services that could be provided using leveraged special education dollars include:

- Implementing state financing activities such as administering an AT purchasing program for the State Education Agency or doing volume buying to reduce costs for certain types of AT, etc.
- Coordinating reuse services across school districts or for a particular high cost type of AT, or implementing a comprehensive Part C reuse system statewide;
- Implementing a targeted device loan program specifically for team decision making with a goal of reducing Individualized Education Program disagreements about AT;
- Offering AT assessments, consultations or training in a fee-for-service or cost recovery model specifically designed to assist local education agencies in meeting the needs of students with disabilities.

Employment:

The major federal funding stream for employment of individuals with disabilities is Vocational Rehabilitation (VR) funding in the Rehabilitation Act section of the Workforce Investment and Opportunity Act (WIOA). Federal VR funding is allocated to state VR agencies who provide employment services for eligible individuals with disabilities either directly or through purchase of service agreements with community providers. Federal VR funding requires a state match and VR dollars are allocated to the state according to a formula. VR funding is primarily used for individual client services but can also be used for "services for groups of individuals" in which WIOA specifically authorizes the "establishment, development, or improvement of assistive technology demonstration, loan, reutilization, or financing programs in coordination with activities authorized under the Assistive Technology Act of 1998 (29 U.S.C. 3001 et seq.) to promote access to assistive technology for individuals with disabilities and employers." WIOA also includes a requirement for VR to coordinate with the State AT Program with particular emphasis on VR professional development activities.

Examples of AT Act authorized services that could be provided using leveraged VR dollars include:

- Implementing volume buying of AT to reduce cost to the VR agency partnered with open-ended loan reuse to ensure that AT no longer needed by clients is refurbished and reassigned to the maximum extent possible;
- Implementing a targeted device loan program specifically to support individual employment plan goals;
- Providing coordinated device demonstrations to determine the AT needed for a specific employment goal or for a specific employment setting;
- Offering AT assessments, worksite consultations or training on a fee-for-service basis specifically designed to meet client AT needs for employment or the professional development needs of the VR workforce.

Health Care:

The major health care funding streams used to pay for assistive technology are Medicaid, Medicare and private health insurance. The majority of AT covered by these funding sources is durable medical equipment (DME) used for mobility, communication and daily living functions. Unlike special education and employment, there is no federal statute, regulation or even guidance under Medicaid, Medicare or private insurance that supports coordination or collaboration with the State AT Program.

Despite this, some states have forged partnerships in the area of health care securing Medicaid leveraged funding to operate reuse programs that refurbish devices (mostly DME) purchased with Medicaid funds or otherwise donated devices and placing those devices with eligible recipients (including but not necessarily limited to Medicaid beneficiaries). These Medicaid supported reuse programs have a tremendous return on investment and ensure cost effective use of Medicaid funding for AT. Other states have developed agreements with Money Follows the Person programs to provide AT that ensures individuals can move from congregate care settings into the community. Fee-for-service work for healthcare funding sources will have a myriad of requirements to address including enrolling as a provider with health care service networks, meeting federal, state and/or insurer/funding source specific credentialing requirements, obtaining a national provider identifier, working under the direction of or under orders from a qualified medical provider, obtaining malpractice insurance, etc.

Community Living:

There a number of public funding streams that provide AT needed for community living with many focusing on populations such as people who are aging or people with intellectual and developmental disabilities, or on specific functional areas such as independent living, emergency preparedness and financial literacy. Assistive technology is typically a small portion of the overall mission of organizations who focus on community living outcomes. Examples of AT Act authorized services that could be provided using leveraged dollars from agencies working in the area of community living include:

- Implementing a collaboration with an aging agency that includes providing a set of low tech AT to be used by senior centers for device demonstration purposes, along with training staff at those centers to provide such demonstrations;
- Obtaining a grant from the state Developmental Disabilities Council to design a pilot project using AT to help move individuals from sheltered to competitive employment;
- Entering into an agreement with emergency management entities to coordinate efforts to replace lost AT through reuse activities;
- Obtaining Community Development Financial Institution (CDFI) funding to expand access to financing for assistive technology.

More in depth information on various types of funding leveraged by State AT Programs will be provided in individual funding briefs.

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