



## AZVRS MSP PROGRAM - COMPREHENSIVE DISABILITY RELATED TRAINING SERVICES FOR THE BLIND AND VISUALLY IMPAIRED (COMP BVI)

### FREQUENTLY ASKED QUESTIONS (FAQ)

- 1. Service Specifications, Section 1.1(5) – Transportation:** Supplemental services, including transportation, are only available to out-of-state vendors. While transportation to training-based appointments is permitted, this does not cover transportation to and from the facility for day-based students, to and from facility for residential students living in other parts of the state, and medical appointments for residential consumers, or other transportation needed to maintain consistent daily training. *We ask RSA to extend transportation services to day-based vendors. Saavi has provided daily transportation since 2006 due to ongoing challenges VR has had securing consistent transportation vendors. We have done this with full counselor knowledge and without RSA financial support. Without our ability to provide transportation for consumers when other vendors were not dependable or viable, their attendance would be significantly challenged. This reduces learning retention and inhibits or prolongs training completion. We were told transportation could be explored in the new contracts, yet as an in-state vendor we would now be excluded.*

**A: Supplemental Services is truly for out-of-state providers only, and the reason for this is because VR Clients can receive these services directly outside of Comp BVI. As an example, Psych Assessments will be provided by contracted providers outside of Comp BVI services. Please review section 4.6 on the Service Specifications which allows for VR Client In-State Travel Reimbursement (Transportation of a VR Client from the Vendor facility to a service-related appointment or work site by Vendor Personnel who remain to provide direct Client services, which must be pre-approved by the VR Counselor, and must utilize the State of Arizona Accounting Manual (SAAM), and include supporting documentation to validate the travel).**

- 2. Service Specifications, Section 1.1(8) – Employment Services:** As written, services in 1.1.3 can only occur once a consumer reaches a skills rating of three in RIS and AT. While job readiness and job search require this rating, career exploration is part of early adjustment-to-disability training. Consumers often research blind professionals working in their fields of interest, and this occurs at the start of training. Delaying career exploration until rating three will significantly prolong training and limit early conceptual development.

**A: Agreed. The Service Specifications have been updated to specifically state Job Readiness Training requires the skill level of 3/completed Core Blindness Training. This allows the remaining Employment Services (including Career Exploration) to be exempt from this requirement.**



3. **Career Exploration – Exhibits Z6a-b-c:** These exhibits need specialized questions for blind consumers, including exploration of functional barriers, accommodations, and the blindness skills needed to use those accommodations. The current tools appear generalized, yet blindness rehabilitation requires blindness-specific considerations. Career exploration must occur earlier in training to ensure that skills training supports the accommodation required for a consumer’s chosen career.

**A: Agreed. The Service Specifications have been updated to specifically state Job Readiness Training requires the skill level of 3/completed Core Blindness Training. This allows the remaining Employment Services (including Career Exploration) to be exempt from this requirement.**

4. **Residential Referrals – Transition Between Assessment and Training:** Residential consumers are typically authorized an assessment unit, several residential days, and training hours immediately after assessment so they do not leave the program between phases. This has long been standard practice though not written in the contract. We request language that ensures a consistent transition from assessment to training for residential consumers. This ensures that the consumer does not need to leave the program between the assessment and training.

**A: Thank you for this feedback! We will include this item for RSA consideration along with the additional new feedback pieces we receive. At a minimum, this provides great feedback on establishing standard processes under the MSP Program to avoid gaps in service to the VR Client.**

5. **Instructor Qualifications – Add NCATB:** We request adding the NBPCB Access Technology certification (NCATB) to the list of approved instructor qualifications. The current list includes NOMC, NCRTB, and NCUEB but omits NCATB. Including it recognizes the full scope of NBPCB certifications.

**A: Thank you for this suggestion! National Certification Assistive Technology for the Blind (NCATB) has been added as an example of the acceptable qualification requirements.**

6. Throughout the exhibits the word “visually impaired” is used. This term is offensive and it is best to use the words “low vision.”

**A: We appreciate your feedback and completely understand. Under the MSP Program, we are utilizing the industry standard terminology.**

7. **Service Specifications, Section 1.1(8) – Employment Services:** As written, services in 1.1.3 can only occur once a student reaches a skills rating of three in RIS and AT. While job readiness and job search require this rating, career exploration is part of early adjustment-to-disability training. Consumers often research blind professionals working in their fields of interest, and this occurs at the start of training. Delaying career exploration until rating three will significantly prolong training and limit early conceptual development.

**A: Agreed. The Service Specifications have been updated to specifically state Job Readiness Training requires the skill level of 3/completed Core Blindness Training. This allows the remaining Employment Services (including Career Exploration) to be exempt from this requirement.**

8. **Residential Referrals – Transition Between Assessment and Training:** When students complete their assessment, and training is recommended, it is best for them to move forward immediately into their program. It would not be helpful to interrupt their program between the assessment period and the training period.  
**A: Thank you for this feedback! We will include this item for RSA consideration along with the additional new feedback pieces we receive. At a minimum, this provides great feedback on establishing standard processes under the MSP Program to avoid gaps in service to the VR Client.**
9. **Blindness Rehabilitation Approaches:** We, as a structured discovery center focus on nonvisual skills so students can perform all tasks independently of vision. Structured Discovery centers do not provide low-vision diagnostic services; we ensure consumers master nonvisual methods and add low-vision tools later if students choose. Questions requiring low-vision considerations should not be mandatory.  
**A: Thank you for your feedback. Assistive Technology Assessment will be required to assess the needs of the VR Client (e.g., AT and/or Low Vision products). Training in regard to Assistive Technology and/or low vision products and equipment requests will be customized and based on the needs of the VR Client.**
10. We additionally recommend adding psychological assessments for identification of academic accommodations, vocational accommodations, and neuro-psych evaluations to support students with multiple disabilities. We request that supplemental services be available for all residential service providers  
**A: Thank you for this feedback. Psych Assessments will be provided by contracted providers outside of Comp BVI Services.**
11. This scope of service no longer includes the option to support consumers whose primary language is not English. Allowing for students to obtain educational services specifically to address a student's ability to speak English is a critical component to learning blindness skills. In mainstream English learning courses, students learn vocabulary and context through immersion and visual sub text. Blind students do not have the information they need to develop strong English vocabulary or concept development. The ability to learn or strengthen English communication while learning the alternative techniques of living as a blind individual is critical for the successful employment of this population. English as a second language in mainstream opportunities do not provide comparable instruction for blind individuals, while learning English while experiencing blindness immersion training provides the best practice approach for meeting employability standards. We request that learning English as a second language be included in education services  
**A: Great feedback! If the VR Counselor believes the VR Client needs to have English as a second language training, they will authorize it through a contracted provider outside of Comp BVI.**
12. We request that the skill level 3 be removed for requirements for consumers to access employment and education services and allow the providers and VR counselors to develop the most appropriate services plan for each consumer.  
**A: Skill level 3 is defined as good and consistent application of the skills. For a VR Client to successfully participate in Educational Support Services or Job Readiness Training they should possess good, consistent self-advocacy and problem solving,**

**successful exchange of information using various communication modalities, or the other elements of training listed.**

13. Where does the state stand on proctactile sign language?

**A: If the VR Client requires this interpreting service, the Vendor will have the opportunity to be reimbursed for pre-approved, authorized Interpreting Services.**

14. Do Vendors need to have authorization in hand three days before services start or before the existing authorization expires to start or continue services. Does this include instance in which a client in program may need additional services units added to an existing authorization?

**A: Vendors are required to receive a Clearance Email from Knowledge Services before initiating services with a new VR Client. Vendors are required to receive a valid authorization through Knowledge Services for services to continue. Services should be placed on hold if an authorization has expired. Verbal authorizations are not valid.**

15. Is this stating that vendors need to notify VRC's within one business day if a student is not actively participating in services on a consistent basis? How should a vendor document non-email communications such as phone calls or other forms of communication and/or what is considered an acceptable attempt to contact? What time frames are in play for the two attempts to contact a VR client? Does this same rule apply if a client has unexcused absences for more than "X" days?"

**A: Vendors are responsible for notifying the VR Counselor (and MSP) through email documentation within one business day when the VR Client fails to participate in services and one unsuccessful attempt has been made to contact the VR Client. Vendors are also responsible for notifying the VR Counselor (and MSP) through email documentation within one business day when the VR Client is encountering services difficulties and programs that interfere with successful completion of the agreed upon objectives. The expectation is that process also applies to unexcused absences. Please simply keep the VR Counselor (and MSP) in the loop.**

16. Does this just mean contact and not actually meeting with the client for the assessment? Or does this mean that the assessment has to be scheduled? What if the client is a barrier to the scheduling? What action should the vendor take? What action should the vendor take if transportation is a barrier for the client?

**A: The requirement is to schedule the Comp BVI Assessment with the VR Client within seven (7) business days of receipt of assignment from the MSP (this does not mean it must take place within seven (7) business days). If applicable, the expectation is that the VR Counselor will plan and authorize transportation when authorizing services to the facility.**

17. Training centers provide different methodologies behind their training practices. While some training centers are vision centered methodology emphasizing remaining vision by focusing on low vision devices, and rely on vision techniques wherever possible. The second group of training centers provide Structure Discovery training which focus on mastering the skills of blindness alternative techniques. This means that the training focus is on utilizing nonvisual techniques, problem solving, and transferable skills that allow for blind consumers to maintain self efficacy regardless of vision changes. This means that only those vision centered training centers will provide low vision equipment support and evaluation, while Structure Discovery

centers will focus on nonvisual skill attainment and will not provide low vision training. Consumers choose their training program based on their informed choice. Low vision services must not be a required component of the training definitions.

**A: Thank you for your feedback. Assistive Technology Assessment will be required to assess the needs of the VR Client (e.g., AT and/or Low Vision products). Training in regard to Assistive Technology and/or low vision products and equipment requests will be customized and based on the needs of the VR Client.**

18. Does this mean that by the end of assessment vendors need to have equipment recommendations completed and submitted?"

**A: Basic equipment requests should be submitted by the end of the Assessment, with the expectation that the more specialized equipment requests will be requested as training progresses.**

19. Does this mean the vendors are taking on the administrative tracking of equipment. This is not in the current contract and requires FTE resources from the vendors

**A: Vendors will be expected to fill out the required form (Comprehensive Disability Related Training Services for the Blind and Visually Impaired Equipment Request and Verification Form) with the request for AT LVP products to the VR Counselor, including a justification. When product(s) are received, Vendors would then update the item list with the serial/model numbers etc. This process is not significantly different than what Comp BVI Vendors currently should be doing. However, it will have to be done each time items/equipment are requested, and no matter the cost. If there is a warranty, that would be included on the Comprehensive Disability Related Training Services for the Blind and Visually Impaired Equipment Request and Verification Form.**

20. Can you confirm that Braille, Handwriting, time management, telephone, and personal record keeping will now fall under communication skills training? (section 2.3.1.c). Under the qualification profile for Communication Skills Training the only qualification is teaching braille. The concern is that VRT's and TVI's would be the appropriate trainers for handwriting, time management, using telephone, and personal record keeping

**A: The Service Specifications have been updated based on this feedback.**

21. In order for there to be hands on the State should be paying for sample units, putting that expense on the vendor is unreasonable.

**A: Please utilize AZTAP as a resource in order to be able to provide hands-on exploration: <https://aztap.org/>**

22. I can't emphasize enough the need to bulk up the financial literacy component, none of our clients have any skills in this area and it is critical for long-term success. Also, nutrition should be paired with cooking.

**A: Great feedback and we agree! These components can be provided under Personal management skills and Home Management skills.**

23. **Emergency Support Services** - Can you elaborate more on this section? Is this required? If a student has a medical emergency at our site is that considered emergency medical treatment? Are vendors also connecting clients with services such as insurance, medical and mental health?

**A: Emergency Support Services are required if there is a medical emergency. If the VR Client is treated onsite for a medical emergency, this is considered emergency medical treatment. Vendors are not connecting VR Clients with services such as insurance, medical and/or mental health.**

24. **Emergency Support Services** - We would like clarification on the emergency services portion of the agreement. It does not specify if this responsibility falls on FBC during instructional hours only or if we are responsible for students when they are not on our campus. Could you kindly provide clarification about this for us?

**A: Vendors are responsible for Emergency Support Services when the VR Client is on their campus, or when directly supporting the VR Client.**

25. **Supplemental Support Services** - Are these billable services? What does this look like; can you provide examples? Is this a separate service, if so, are these hours authorized in advance? Why is there a reference to out-of-state facilities?

**A: Supplemental Support Services are provided only by out of state facilities. In state services will be authorized through contracted providers outside Comp BVI.**

26. **Job Training** - Can you clarify more about what this is as we do not currently provide this service?

**A: Job Training (JT) is a service offering under Comp BVI for Vendors interested in providing Job Training services. If this is not a component of service your organization is interested in providing, you are not required to do so. For more information on Job Training Services, please review the [Job Training Service Specifications](#).**

27. **Service Provider (Vendor) Qualifications** - RIS: If I am reading this correctly it means that no one can work without having prior work experience, so no new grads can be hired? How do people get this experience? AD- I would like to see an MSW added to the list of degrees. AT- very confusing if a certificate in AT works by itself or if you also need something from item 1. Personally I think the AT certificate should stand on its own.

**A: Prior working experience is truly a requirement to provide services under the MSP Program - this is not a change from current COMP BVI contracts for incumbent providers (found in Attachment 6). Given education requirements reference example of degrees, MSW would be considered a related field and would be approved/accepted.**

28. **Service Provider (Vendor) Qualifications** - RIS: 2.4.3 and 2.4.8-The way these sections are outlined are confusing because there are circular references to requirements, so it is difficult to determine which qualifications are for which skills area. How do we show demonstrated knowledge and competence of documented training and or work experience?"

**A: Vendors are responsible for validating the qualifications each Vendor Personnel meet to provide services. Vendors complete the Vendor Personnel Compliance Form**

**which affirms the qualifications they validated to provide services. Obtaining and housing a resume and educational transcripts for Vendor Personnel documents their knowledge and work experience.**

29. Some of these required documents are not in the current contract and requires FTE resources from the vendors.

**A: Please be sure to incorporate the cost to your organization's proposed rate.**

30. I understand the need for this, but what about similar metrics for VR (i.e., maximum response times from VR staff, performance metrics on scheduling transportation, etc.)? Vendors shouldn't be held to a higher standard than VR holds itself to, but in the current system we seem to be the only ones accountable. Also, sometimes clients choose the wrong institution, period. Holding that against us means that agencies will do more to keep clients enrolled instead of moving them to another agency where the fit and success rate will be better. I think in that area you are incentivizing the wrong metric.

**A: Thank you for your feedback. These performance standards are standard under the MSP Program.**

31. **Performance Standards** - Who is tracking this information? Is it the vendors or VR's responsibility?"

**A: Knowledge Services tracks this information.**

32. Is this a vendor requirement for comprehensive services? Why is the process asking for clients to complete core blindness training and then employment services/job readiness. Currently employment services/job readiness are part of the comprehensive program."

**A: Prior to a VR Client moving to Educational Support Services, Job Training, and Job Readiness Training, VR Clients must achieved a skill level of 3 in all Core Blindness Training objectives.**

33. Because comprehensive blindness training is multifaceted, requires that each service area intersect to allow for transferable skill development and skill mastery, and the daily experience of the consumer may require schedule adjustments to support the specific learning style and plan, we strongly recommend that the comprehensive blindness training contract allow for additional units of services beyond hourly. This may include a daily, weekly, or monthly rate. This is best practice and standard for nationally recognized comprehensive service providers and is utilized in contracts for VR agencies throughout the US. This provides a streamlined tracking process for authorizations, payments, and progress tracking as well as cost containment. This process still allows for the division of service tracking for federal audit purposes, while eliminating high demand for administrative support for both DES and providers

**A: Thank you for your feedback.**

34. The current all-inclusive payment model insures that we charge higher rates than needed to accommodate for ASL, etc.

**A: RSA is now approving vendor reimbursement for pre-approved interpreting services provided by a professional agency. This reimbursement should be considered when proposing rates under the MSP Program (vendors would not build this cost into their rate).**

35. I feel that charging a set fee would be more effective than breaking things out in unit costs. I am pleased to see that travel is now part of the contract. This will make it easier for us to make arrangements to fly students into Colorado. I also appreciate the opportunity and ability to provide additional services to our Arizona students when needed such as counseling. Thank you again for this opportunity. We will look forward to filling out the request for proposal when it comes out. All my best, Julie Deden, Executive Director, Colorado center for the blind.

**A: Thank you for your feedback. Transparency is provided with an hourly rate.**

36. Does this mean we could bill for the time we spend communicating with VRC's about or on behalf of a client for examples phone calls and emails. If so, what service is this considered?"

**A: Emails are not billable. Phone calls that last longer than fifteen (15) minutes are billable (Please note: phone calls that last less than fifteen (15) minutes may not be combined).**

37. Do vendors submit one monthly report per client per month, or is it one report per client, by month, by service area? Would vendors submit the entire packet each month if we haven't completed that service each month. For example, if we complete the assessment in January do we have submit the same report each month thereafter.

**A: Knowledge Services will review monthly reporting packet expectations and vendor requirements during the upcoming Vendor Training (March 2026).**

38. Because comprehensive training centers may differ in approach or delivery, we request that additional reports be permitted to best convey the training experience for the consumer.

**A: Although the established State Exhibits are required to be completed, vendors have the ability to include supporting documentation. Please consolidate into a single PDF when submitting through the MSP Program.**

39. In prior contracts it was acceptable to put a small mark-up on the price of the goods to cover FTE and resource costs. Is this now unacceptable?

**A: No, this is not acceptable.**

40. Comp BVI – Career Exploration Summary: Is this to be filled out by clients?

**A: The expectation is that this form would be completed by the VR Client, with assistance, as needed.**

41. Comp BVI – Career Exploration Labor Market Survey: Is this to be filled out by clients?

**A: The expectation is that this form would be completed by the VR Client, with assistance, as needed.**

42. Comp BVI – Monthly Progress Report: Vendor respective monthly appraiser score, does not have any information what the rating score is for all areas of the report in which this is needed.

**A: The Vendor should be averaging the VR Client's Skill Level in that service area to determine the Monthly Skill Level Score.**

43. Comp BVI – Monthly Progress Report: There is no explanation for CSP. No indication how to fill out the following question, “Starting standard from csp.”  
**A: Knowledge Services will review monthly reporting packet expectations and vendor requirements during the upcoming Vendor Training (March 2026).**
44. Comp BVI – Supported Ed Checklist: Does this need to be completed by Client?  
**A: The expectation is that this form would be completed by the VR Client, with assistance, as needed.**
45. Comp BVI – Monthly Progress Report(s): Monthly Training Report Exhibits – Tracking Hours: Monthly training exhibits request authorized hours, hours completed, hours needed and sometimes start and end times for each session. In a comprehensive training environment, this is difficult for each instructor to manage individually. We track authorizations and attendance in a separate coordinated form, allowing staff to manage all services together. This provides continuity and clear tracking for providers, counselors, and others managing authorizations.  
**A: Thank you for your feedback. Documenting the service hours based on the burn down of hours authorized per training/service area (and based on the daily time in/time out options found on the calendar) provides transparency for the VR Counselor and Contracts Monitoring.**
46. Comp BVI – Monthly Progress Report(s): Monthly Training Report Exhibits – Tracking Hours Monthly training exhibits request authorized hours, hours completed, hours needed, and sometimes start and end times for each session. We provide comprehensive services and typically do not bill hourly. We understand that hourly recording is required under this contract, and we will track hours of instruction, as required, but it is very complicated and takes a great deal of administrative time. We would hope in the future that the fee structure will be changed so that we are able to charge an inclusive fee for services provided. No other state agency uses this hourly billing system for comprehensive services.  
**A: Thank you for your feedback.**