Consumer and Support Service Provider (SSP) Policy and Guidelines

Effective: 07/01/2024

# Program Purpose

Deafblind Services are intended for deafblind individuals who seek equal access to communication and environmental information while navigating in the world. The DeafBlind Services (DBS) program provides Support Service Providers and Orientation and Mobility training.

Support Service Providers (SSP) are specially trained professionals who empower a deafblind person to access their environments and make informed decisions. SSPs provide them with visual and environmental information, sighted guide services, and communication accessibility.

The program is operated by a team of subject matter experts focusing on areas such as scheduling, invoicing, consumer relationships, and vendor relationships. The result is a robust team that can quickly adapt to program demands and changes as well as the demands of the Commission as a whole.

# Consumers

##  Eligibility Requirements

Eligibility requirements are based in part on the Colorado Commission for the Deaf, Hard of Hearing, and DeafBlind’s (CCDHHDB) Communications Technology Program (CTP); the Utah State Office of Rehabilitation Division of Services for the Blind and Visually Impaired’s SSP program; the Helen Keller National Center; and the Arizona Commission for the Deaf and Hard of Hearing. For a person to be eligible for SSP services, they must meet *all* the following three requirements.

1. Vision requirement as documented by the following sources: an eye doctor, CTP, a medical professional, or a certifying entity:
	1. Visual impairment of distance vision acuity at 20/70 or less in the best eye with best correction, or
	2. Progressive vision loss with distance vision acuity of 20/50 or less in the best eye with best correction, or
	3. Field loss of 20 degrees or less in the best eye. Loss must be a functional impairment.
	4. Vision Report must be within the last two years of application date.
	5. Once documented, ongoing certification is not required.
2. Hearing requirement as documented by the following sources: an audiologist, CTP, a medical professional, or a certifying entity:
	1. Audiogram showing a Pure Tone Average at 500hz, 1000hz, and 2000hz of at least 50 decibels or worse in the best ear.
	2. Audiogram must be within the last two years of the application date.
	3. Once documented, ongoing certification is not required.
3. Cognitive requirement: since SSPs are trained to follow the direction of the consumer,
	1. Consumers must have the cognitive capacity to advocate for themselves, respond in an emergency, and give instructions or direction to the SSP regarding the activity in which they would like to engage.
	2. If consumers are not able to independently participate in SSP activities, program staff may suspend or terminate services pending further discussion and/or evaluation.

If a consumer is deemed ineligible, they may appeal the decision. At that time, a committee consisting of a member of the DeafBlind Services Team, DeafBlind Advisory Council, and a Subject Matter Expertise related to deafblind issues will review the situation and issue a final decision.

## Consumer Parameters

As part of the intake process and annually thereafter, consumers must review SSP program goals and guidelines with a member of the DeafBlind Services Team.

* After eligibility is determined, the consumer will be added to the list of active consumers or a waitlist.
* Consumers are provided with between 1-24 hours of SSP use a month depending on program funding and capacity. Due to the two-hour minimum required of vendors, all assignments are a two-hour minimum regardless of if the full two hours are used or not.
* At least once annually, the consumer’s status and use of the program will be reviewed, and they will be asked to sign consumer use expectations and guidelines. Three attempts of contact will be made within 90 days via the last known contact points via email and phone call. If unsuccessful, the third contact will be via certified U.S. mail. If there is no response, they will be removed from the program and must reapply. If reapplying - they will be placed on the waitlist if there is no space available on the active list.
* The consumer must provide their contact information and at least one emergency contact to the DeafBlind Services program. It is the consumer’s responsibility to notify DeafBlind Services if their contact information changes.
* As indicated in the annual guidelines that consumers must review and sign to receive services, consumers cannot live with, be a spouse of, a child, sibling, and/or a close acquaintance of the SSP assigned to work with them. Violation of this rule can result in suspension or termination of services.
* At times, SSP requests will indicate a need for further O&M and/or CTP training to promote independence. When appropriate, consumers may be asked to be evaluated for O&M and/or CTP support to maximize SSP availability and funding for all consumers.
* The consumer must be respectful of the requests the SSP makes regarding their vehicle(s). For example, if the SSP prefers food not be eaten in the car, the consumer must eat before or after riding in the car. If the consumer has a service dog, the SSP may require the consumer to bring a blanket to put down before the dog gets in the car.

# SSP Vendor

## Vendor Requirements

SSPs work as vendors for the State of Colorado and are required to comply with all state of Colorado vendor requirements. To maintain Good Standing as Vendors, the following conditions must be met:

* To ensure consumer safety, vendors must obtain and pass an initial criminal background check. SSPs must continue to have a clear criminal history and must notify DBS Program staff if there is a change in their circumstances (e.g., being arrested for driving under the influence, etc.).
	+ SSPs may be required to conduct additional background checks throughout their tenure at the discretion of the team.
	+ Background checks are at the cost of the vendor.
* SSPs cannot live with, be a spouse of, a child, sibling, or close acquaintance of the consumer they are assigned to.
	+ Note: In some circumstances, such as the need for ASL communication or in a small town, consumers and SSPs may know each other. SSPs must notify the DeafBlind Services Team of this potential conflict of interest. The team will determine if another SSP needs to be assigned or if the current SSP can continue to work with the consumer.
* At least once annually, the vendor’s status will be reviewed in accordance with program requirements, policies, and expectations.
* As per State Risk Management requirements: Vendors are required to maintain a $1,000,000 automobile liability policy and provide proof to DeafBlind Services annually and/or whenever coverage changes.
* As per State Risk Management requirements, Vendors are required to maintain $1,000,000 professional liability insurance coverage and provide proof to DeafBlind Services annually and/or whenever coverage changes.
* As per State Controller Requirements: Vendors are required to register as individuals or businesses with the Secretary of State and renew this registration on an annual basis. DeafBlind Services must be provided with this documentation annually.
* As per the Colorado Department of Human Services Requirements: Vendors are required to complete *Personally Identifying Information* certification annually.
* As per the State Controller Requirements: Vendors are required to review and sign *Independent Contractor Agreements* on an annual basis or when renewal is required.

## Vendor Vehicle Usage, Automobile Liability, and Mileage Compensation

Prior to transporting a consumer, SSPs must have (and maintain) a valid Colorado driver license. Travel is only allowed within the Colorado state borders. The following guidelines apply:

* Google Maps is the official mapping software used for all invoice reviews and audits. To ensure accuracy and reduce errors, vendors are required to submit mileage information using Google Maps.
* Vendors are welcome to use their preferred mapping software or GPS during assignments if invoices use Google Maps links, timing, and mileage amounts.
* In the event there is construction, detours, or a significant deviation from a suggested route that increases travel time, vendors should note the incident in their invoice or via an email to the DeafBlind Services team for documentation purposes.
* Vendors are required to input the shortest distance possible in their invoice. Vendors may choose to take an alternative route; however, they are only paid for the shortest distance possible as per state rules.
* Vendors are not reimbursed for any toll charges.
* Vendors are reimbursed for parking costs, receipts are required.
* There is a 50-mile radius limit for all consumers residing in the front range and a 75-mile radius limit for all consumers residing in the rural area. The Rural Communication Access Services program boundaries will be utilized to determine front range vs. rural area. Assignments exceeding this threshold must be pre-approved by program staff. Assignments exceeding 50 miles are only paid up to 50 miles without prior approval.
* Mileage radius limits do not apply to SSP travel to and from consumers.
* SSPs will be reimbursed for mileage at the current state approved rate per mile. This rate is subject to change. Any changes will be communicated to vendors. [Current mileage rates can be found at the State Controller website](https://osc.colorado.gov/financial-operations/fiscal-rules-procedures/mileage-reimbursement-rate).
* The program allows for compensation of travel time if mileage exceeds 40 miles one way or 80 miles round trip. This compensation is at 70% the base rate regardless of date or time (e.g., holiday, evening, and weekend rates do not apply for travel time).
* If transporting consumers, SSPs are expected to carry the required minimum automobile liability coverage. It is recommended that SSPs:
	+ Check with their insurance agent to determine if their policy will cover damage to the vehicle while being used for business purposes and make any changes to ensure they are fully covered. Note: Damage to an SSP’s personal vehicle is not covered by State Risk Management insurance.
	+ Recognize that in the case of an accident or issue, the employee’s insurance will be the primary coverage for liability insurance, while State Risk Management will be secondary.
	+ Recognize that if they do not have automobile liability insurance, they cannot transport consumers in their personal vehicles. They may meet consumers at assignment waypoints.
	+ Recognize that the SSP is responsible for any parking or traffic violation tickets or fines.
* Provide a copy of their insurance policy, showing the amounts of coverage, at least once a year to the DeafBlind Services Team. Note: The Team will keep current copies of vendor paperwork on file.
* Track all assignment waypoints using Google Maps and attach it to their invoices in addition to listing all waypoints on invoices.
* Submit the mileage reimbursement form within the same fiscal year the mileage was accrued. Fiscal years are July 1 through June 30 each year.

## Professional Liability, Training, and Mentoring Requirements

To understand the role of an SSP and relationship dynamics with consumers, SSPs will complete a minimum of 18 hours of training and mentoring prior to accepting SSP assignments.

* 3 hours of hybrid training (online and in-person)
* 5 hours of observation
* Register to become a vendor and complete all requirements except automobile liability insurance (optional)
* Complete 10 hours of paid SSP work supervised by a mentor (must successfully become a vendor first)

Once the SSP has completed the initial training and mentoring requirements, the SSP will be put on the list of vendors who are available for assignments. The DBS Team will periodically observe, evaluate, and provide feedback on SSP activities.

* SSPs are expected to contact the DBS Team with any concerns, issues, and/or feedback.
* SSPs should share any concerns about the consumer with the DBS Team as appropriate. In case of serious situations or emergencies, SSPs should contact Adult Protective Services (APS) and/or 911 and notify the DBS Team.

## Professional Ethics and Boundaries:

SSPs must follow the State of Colorado required professional and ethical boundaries as well as the SSP Code of Conduct. In addition to the above, program specific guidelines of ethics and boundaries are listed below.

* Choice: The purpose of the SSP program is to increase independence. SSPs should remember that the consumer is the decision maker on what to do and when and where to go if those activities are within the program’s parameters.
* Confidentiality: The SSP and consumer spend a significant amount of time together and the SSP may learn many confidential, private, and personal details about the consumer. Confidential information may not be shared with anyone without the consumer’s consent or when necessary to respond to an emergency.
* Privacy: The consumer’s privacy is important. When the SSP is in the consumer’s home, they must have the consumer's permission to read, review, touch or move the consumer’s belongings.
* Professionalism: The SSP needs to be on time for appointments, focused and ready to work. Both parties are expected to conduct themselves in a professional manner, including in communication and clothing as appropriate. SSPs and consumers may form close relationships, however the SSP must maintain professional boundaries with the consumer. That includes not accepting gifts or being a beneficiary in the consumer’s will, living with the consumer, or having the consumer come to their home for social purposes, etc.
* Technology: SSPs should not be using technology such as cell phones, tablets, or computers for their own purposes during an assignment. When SSPs are on assignment, their full attention should be on the consumer. The SSP is being paid to give one-on-one attention to the consumer. At times, SSPs may need to use technology to do the assignment, such as looking up an address at the consumer’s request. That is acceptable. There may be times when the SSP must take an emergency personal call, but such situations should be rare.
* Record-Keeping: The SSP is expected to complete and submit documentation of the activities engaged in and assignment location(s). Typically, these records will occur through the invoicing process and should be completed monthly at a minimum. Additional documentation regarding consumer needs and concerns may also be required.
* Drinking and/or Drug Use: SSPs are expressly forbidden from using any intoxicating substances while on duty (e.g., alcohol, cannabis, etc.). If the SSP is suspected of intoxication, the DBS Team must be notified immediately.
	+ If consumers choose to consume intoxicating substances during assignments, the SSP has the right to restrict activities (e.g., not entering a room where substances are being consumed; not assisting with consumption; not allowing it in their vehicle, etc.)
	+ If at any time a consumer becomes intoxicated, the assignment will be immediately terminated. At that time, safe transportation (taxi, family, etc.) must be utilized for the consumer. The DBS Team must be notified immediately.
* SSPs cannot conduct personal business for themselves while working with consumers. For example, when assisting a consumer with grocery shopping, the SSP cannot do their own shopping at the same time. The SSP’s focus must be on the consumer.
* SSPs should allow plenty of time to get to their next assignment - an assignment should not be terminated early for SSPs to travel to their next assignment.
* Assignments are dedicated fully to the consumer, SSPs should not use any assignment time to do their own administrative work.
* Assignments should follow the scheduled timeframes. We understand that occasionally - assignments may run over time. If the time overrun is reasonable (within 1 hour) and due to circumstances out of their control (e.g., traffic, appointment delays, etc.) - no prior approval is needed. However, the DBS Team should be notified immediately so that consumer hours can be adjusted. If assignments are expected to run significantly longer and it is during business hours - the Team should be contacted as soon as possible to review the situation.
* If funding is cut or SSP hours are reduced, SSPs should not seek to burden consumers with details of the impact on vendors or expect consumers to advocate for them. In such situations, the consumers are also dealing with a likely loss of services/hours themselves.

# General Program Information

## Hours and Funding

Funding is limited for SSPs and unfortunately consumers are on a waitlist due to a lack of resources. Yet, the active list has consumers who do not use SSPs or use less than the allocated hours of monthly SSP services. A tier system is proposed as a compromise to maximize use of SSPs and reduce the size of the waitlist.

* The active list of consumers already operates on an informal tier system in terms of usage. Establishing a formal system helps to ensure a robust list that is being maximized and allows a greater number of consumers to access SSP services.
* Reserving 24 hours for each consumer who may or may not maximize their allocated hours results in a waitlist with a lengthy wait time.
* Based on existing use of SSP hours, the below tiers are proposed:
	+ Tier 1: 2-6 hours
	+ Tier 2: 7-15 hours
	+ Tier 3: 16-24 hours
* Based on funding and usage, consumers will be classified within one of the above tiers and limited to the hours allocated to each tier.
* Consumer hours will be tracked and reviewed on an annual basis to determine tier classifications.
* Tier Classifications and details will be communicated with Consumers.
* New consumers will automatically be placed on Tier 2.
* Existing consumers will be placed on Tiers based on their average usage.
* Consumers who are using SSP hours for needs that could be met by O&M or CTP training may be referred for additional training and/or reclassified to free up additional hours for those in need.
* Requests that exceed tier amounts will be noted and reviewed by the DBS Team every year for reclassification as funding allows.
* Consumers removed from the active use list will be added to the waitlist if they make new SSP services requests.
* Consumers may decide to voluntarily move down tiers, however, moving up tiers requires DBS Team review and approval.
* Consumers may request to pool their monthly hours into quarterly “buckets” to allow for occasional extended use (e.g., conferences). Consumers must opt-in to this program.

## Scheduling, Activities and Limitations

Consumers may contact SSPs directly to inquire availability and make tentative plans. However, assignments are not official until a confirmation is sent from the DeafBlind Services Team.

**If an assignment occurs without official confirmation, vendors will not be paid!**

The safety of the consumer and the SSP are of utmost importance. If at any time either party feels uncomfortable, they can decline or terminate an assignment. All such incidents must be reported to the DBS Team.

Consumers are allowed to indicate their SSP preferences, however, the Program Team may assign SSPs based on geographic distance. Communication and skill matches will always be considered in all placement decisions.

* SSPs have discretion in whether to accept each assignment query.
* Cancellations should only occur in the case of illness, emergency, or other serious unavoidable circumstances. If the SSP or consumer needs to cancel, they must notify the other person and program immediately.
* Cancellations with less than 48 hours’ notice are paid at the base rate regardless of if the assignment covers a holiday, night, or weekend period.
* If a consumer fails to show up for an appointment, the SSP is required to stay for 20 minutes and make at least one attempt to contact the consumer via email and phone call before leaving. The DeafBlind Services Team must be notified of all no-shows.
* Consumer no-shows or cancellations with less than 48 hours’ notice will be counted against the consumer’s monthly SSP hours.
* The SSP must inform the Program Team of the no-show within two days.
* If the SSP or consumer is more than 15 minutes late to an appointment or runs over 15 minutes past the scheduled end time, the other party should report this to the DBS Team within two days. The additional time will be counted toward the consumer’s monthly allocation.
* If there are more than three last-minute changes or cancellations in a three-month period, the DBS Team will reevaluate the SSP or consumer for their participation in the program.
* Since last minute cancellations can “ding” a consumer’s hours, it is encouraged that consumers and vendors reschedule assignments if possible.

## Consumers are responsible for:

* Planning and organizing activities for each appointment prior to the SSP’s arrival.
* Organizing appointments based on the amount of time each task is expected to take and the amount of time available with the SSP.
* Travel during an assignment should be arranged to maximize efficiency. The consumer may work with the SSP to determine the best routing for stops on an assignment.
* Pay their own admission fees, meal costs, and/or any other associated costs of attending an activity.
	+ Note: federal legislation such as the ADA does not recognize SSP services as an accommodation. Therefore, while some places will allow a person with a disability to have a guide or an aide attend for free, this activity is not included under the ADA.
	+ The consumer and SSP should find out in advance whether the SSP can enter for free, otherwise the consumer is responsible for paying for the SSP’s admission or other associated costs.

## SSPs are responsible for:

* Relaying visual and environmental information in the consumer’s preferred method of communication.
* For example, the SSP should relay the following information to the consumer.
	+ Who is in the room.
	+ What people are doing and talking about.
	+ The emotional tone of the room (e.g., are people frustrated, excited, tired, confused, etc.
* Encouraging the consumer to have a solution-focused mindset to improve their independence. The SSP may not recommend a solution for a consumer but rather provide options the consumer may evaluate.
	+ For example, if the consumer cannot use their spices due to lack of organization, the SSP may suggest solutions such as categorizing based on priority, arranging alphabetically, creating braille labels, creating large print labels, color coding, etc. The consumer then decides on the approach.
* Paying for their own meals and food unless they are included in the cost of the activity or event.
* Recognizing that they are not there to provide interpretation services. The SSP may assist with communication by explaining what was said to the consumer in a summary fashion but may not step into the role of facilitating ongoing communication between the parties. In those circumstances, the SSP must inform the parties that an interpreter is needed.
	+ SSPs are typically not certified interpreters and may not provide interpretation services.
	+ This guideline applies even if the SSP works or has previously worked as an interpreter outside of their SSP role.

## Types of Allowed Activities:

* Errands: shopping, going to the dry cleaners or the library, etc.
* Reading and writing: reading mail and personal correspondence, paying bills, completing basic banking transactions, looking for apartments, applying for public services, etc.
* Recreational activities: attending sporting events or other entertainment, going for walks, playing card games, etc.
* Transportation: transporting the consumer to activities, attending the activity with the consumer, and transporting the consumer home.
	+ Note: the SSP’s role is not solely transportation - if the purpose of the assignment only includes transportation - the DBS Team must be notified immediately.
* Medical appointments: attending doctor or physical therapy appointments.
* Religious events: attending weddings, baptisms, funerals, family history centers, choir concerts or church-related events.

## Types of SSP Limitations:

* The SSP may not sign any document(s) on behalf of the consumer.
* The SSP may not do activities the consumer should do for themselves like cleaning, cooking, bathing, personal care, dog sitting, carrying in groceries, etc.
* The SSP is not a medical professional and cannot provide home health care or deal with medical situations or emergencies. This includes handling body fluids, testing blood sugar levels, providing medical advice or care, etc.
* If the consumer needs consistent medical attention, such as home health care, they should not be left alone with an SSP.
* If there is a medical emergency and help is needed (e.g., a consumer is having a seizure or unable to communicate due to a medical issue), the SSP must call 911 immediately and notify the DBS Team and the consumer’s emergency contact. If a situation arises where the safety of the consumer t is questionable (e.g., the consumer is dizzy), the SSP should make sure the consumer is able to get home safely and medical personnel are contacted if necessary. The SSP must notify the DBS Team immediately.
* If a situation arises where the SSP is unsure if emergency medical personnel should be contacted, they must err on the side of caution and the safety of the consumer and call 911.
* SSPs cannot drive consumers to the emergency room and must call 911 if there is a medical emergency.
* The SSP cannot just drop a consumer off at an activity and return later to pick up the consumer. The SSP must stay with the consumer for the duration of the activity.
	+ If the consumer needs transportation only, other resources such as Uber, Lyft, taxis, and paratransit are available.
	+ If it is a medical appointment, SSPs may remain in the waiting room unless the consumers prefer them to accompany them to the examination room.
* SSPs cannot drive consumers more than 50 miles one-way without prior DBS Team approval and agreement from all three parties.
* Activities requiring overnight travel require prior approval from the DBS Team and agreement from all three parties.
	+ Note: SSPs may not sleep in the same room as consumers.
	+ Note: Program funds will cover pre-approved lodging and per diem costs for SSPs.

# Assignment Expectations

To ensure responsible stewardship of the SSP program and ensure availability for all consumers, the following expectations are in place:

* All assignments have a two-hour minimum. Consumers are encouraged to maximize their time with SSPs. SSPs are encouraged to be respectful of consumer time and schedule buffers between assignments to not impact consumers.
* When requesting assignments, consumers must provide the day, start time, end time, and types of activities occurring. If they have already inquired about SSP availability, they should include this information in the assignment request as well.
* SSPs should also verify assignment activities in their invoices for documentation purposes.
* The DBS Team must be notified of any assignments that run over time. This time will be added to the consumers’ monthly allotment. In the event the consumer’s hours are maxed out for the month, hours will be docked from the following month’s allotment.
* Assignments must occur within a 50-mile radius of the consumer’s home unless prior approval is given by the DBS Team.
* If the consumer desires to engage in an activity outside of the 50-mile radius without prior program approval, they may travel there on their own and meet the SSP there.
* SSPs are available to meet consumers at the airport to assist with communication and environmental navigation. The hours and mileage will count against their monthly allotments.
* All issues and/or misconduct will be reported immediately to the DBS Team.
	+ Note: CDHS has a complaint system in place if there is a need to escalate complaints beyond the DBS Team. File the form [here](https://docs.google.com/forms/d/e/1FAIpQLSek29TUKqXIq6txvO0yYRd8zcyTbXvZHOGpeJUd3PoA4sMTbA/viewform) if you need to file a complaint.

# Program Contact Information

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