Assistive Technology Device Loan: Quality Indicators

ATDL: QI

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Introduction
Device Loans of assistive technology (AT) devices is one of the four state level activities conducted by Statewide AT Programs under the Assistive Technology Act of 1998, as amended (AT Act). Device loans are primarily intended to assist individuals with disabilities and other stakeholders make informed decisions about devices; although loans may serve other purposes such as filling in the gap for a consumer waiting for repair or funding for their own device or to provide a short-term accommodation. See Appendix A for a more detailed description of what is a device loan.

These quality indicators and accompanying key considerations statements were developed to assist Statewide AT Programs to determine whether they are consistently providing device loans in a quality manner. Quality indicators will assist device loan programs to evaluate their program to identify strengths and needs for improvement. Programs should be able to apply most of these quality indicators, regardless of delivery model. These quality indicators represent attributes for loans that are best practices, not minimum standards.

These tools are for self-assessment and program planning purposes only. Although the indicators incorporate key elements from the Rehabilitation Services Administration’s (RSA) AT Act Program Review process, State Plan for AT, and AT Act data collection, these quality indicators are not used by (RSA), when conducting program reviews.

The quality indicators developed for the ATDL:QI is the result of many rounds of discussion, review and revisions and is not a “final” version. The indicators and practices are dynamic and will grow and change as the indicators are used and reviewed.

This document was developed by a work group facilitated by the National Assistive Technology Technical Assistance Partnership (NATTAP). The first draft of the ATDL:QI was developed at a workshop in Arlington, Virginia in February 2010 and over several teleconferences. The members of the device loan work group consisted of: Rick Anderson (Arkansas Increasing Capabilities Access Network), Laurie Brooks (Oregon’s Statewide AT Program), Carol Girt (Indiana Assistive Technology Act Project), Amy Goldman (Pennsylvania's Initiative on Assistive Technology), Barbara Gullett (Arkansas Increasing Capabilities Access Network), John Morris (Texas Technology Access Program), Carol Page (South Carolina Assistive Technology Program), Tori Pennell (MonTECH), Martha Rust (Georgia Tools for Life), Shelby Sanders (Oklahoma ABLE Tech), Bari Schlesinger (California AT Systems), Tessa Stinnett (Oklahoma ABLE Tech), Lynette Strode (Illinois AT Program), Brian Bard, Rehabilitation Services Administration, Robert Groenendaal, Rehabilitation Services Administration, Jeremy Buzzell, Office of Special Education and Rehabilitative Services, and Diana Carl, Consultant.
During this workshop, quality indicators, intent statements, and key considerations were developed in the following areas:

- Statewideness and Comprehensiveness
- Program Operations
- Inventory
- Support for Borrowers
- Program Evaluation

The intent statements aid in understanding what the quality indicators mean or how they are implemented. The key considerations are key areas that indicate how the quality practices are implemented.

Throughout this document, the use of the term “consumer” includes individuals with disabilities, their families, and professionals who work with them.

The term “program” refers to the Statewide AT Act Program and any partners and subcontractors that receive funds and/or equipment for device loans.

The Appendices at the end of this document provide definitions of terms and relevant passages from the Instruction Manual for the Annual Report for State Grant Program and from the AT Act.
Area A: Statewideness and Comprehensiveness of Loan Programs

Statewideness
A1. Device loan programs have the capacity to serve consumers in all areas of the state.

**Intent:** The device loan program is designed and implemented in a manner that makes it possible to provide device loans to people in all geographic areas of the state. This can be done using any means or combination of means, which may include but are not limited to a strategic central location, a network of centers, collaborations with other partners, transportation of devices to various sites in the state, and delivery of devices upon request to consumers or a combination of these approaches.

**Key Considerations:** The device loan program has the capacity to serve:
- Up to 20% of the counties or other state defined geographic areas
- 21-40% of the counties or other state defined geographic areas
- 41-60% of the counties or other state defined geographic areas
- 61-80% of the counties or other state defined geographic areas
- 81-100% of the counties or other state defined geographic areas

Comprehensiveness – Functional need- Inventory Breadth
A2. Device loan programs have the capacity to serve consumers across the range of functional needs.

**Intent:** The device loan program is designed and implemented to provide device loans to consumers regardless of functional need or type of AT needed. Programs assure access to multiple categories of devices that meet different functional needs. For example, the program may include locations that have specialty device collections or have agreements with partners throughout the state so that devices not in the program’s inventory can be borrowed when necessary. (See Appendix C for categories of functional needs.)

**Key Considerations:** The device loan program has the capacity to provide device loans in:
- 1 category of functional need
- 2-3 categories of functional needs
- 4-5 categories of functional needs
- 6-7 categories of functional needs
- 8-10 categories of functional needs
Comprehensiveness- Inventory Depth
A3. Device loan programs have the capacity to loan a wide array of assistive technology within each category of functional need served by the program.

**Intent:** The device loan program is designed and implemented in a manner that offers consumers access to products within each functional category. For example, within each category, there are devices that represent alternate strategies (low tech to high tech) to meet the functional need.

**Key Considerations:** The device loan program has the capacity to lend multiple devices in:
- 1 category of functional need
- 2-3 categories of functional needs
- 4-5 categories of functional needs
- 6-7 categories of functional needs
- 8-10 categories of functional needs

Comprehensiveness - Age
A4. Device loan programs have the capacity to serve consumers of all ages.

**Intent:** The device loan program is designed and implemented in a manner that makes it possible to have a flexible inventory that represents devices appropriate for consumers of varying ages. Some device design or by function are better suited for one age group versus another. The categories of age are as follows:
- Infants and toddlers (Birth through 2 years of age)
- Preschool (3 through 5 years of age)
- K-12 School Age (6 through 21 years of age)
- Adult (18 through 64 years of age)
- Senior (65 years or older)

**Key Considerations:** The device loan program has the capacity to provide device loans in the following areas.
- 1 category of ages
- 2 categories of ages
- 3 categories of ages
- 4 categories of ages
- all ages

Underserved Populations
A5. Device loan programs have the capacity to serve consumers from traditionally underserved populations.

**Intent:** The device loan program is designed and implemented to provide device loans to consumers regardless of race, ethnicity, culture, socioeconomic status, and other factors that comprise underserved populations in the state.

**Key Considerations:** The device loan program:
- Has a diversity plan based on analyzing the audience it serves.
- Has procedures in place to access translators to ensure that non-English speaking consumers’ needs are served.
- Provides staff training on cultural competency.
- Provides staff training on people first language.
- Provides staff training on customer service.
- Has formal/informal relationships with associations/organizations that provide support services to underrepresented organizations.
Area B. Program Operations

Protection of Information
B1. Device loan programs ensure that consumers are provided services that are respectful of their privacy.

**Intent:** The device loan program has procedures that are applied consistently. Essential information is collected and handled properly to ensure privacy.

**Key Considerations:** The device loan program:
- Has written procedures to protect consumer’s privacy when collecting information about the consumer.
- Provides staff training on compliance with privacy laws.
- Monitors and enforces compliance with privacy laws.
- Has quality assurance mechanisms to ensure consistent application of procedures.

Lending Procedures - Circulation of Equipment
B2. Device loan programs manage the circulation of devices in a manner that is equitable, efficient and fiscally responsible.

**Intent:** The device loan program ensures equitable access to the device inventory and maximizes availability of devices by establishing efficient circulation procedures.

**Key Considerations:** The device loan program has written, implemented device lending procedures that address:
- Intake procedures of borrowers.
- Number of devices that can be borrowed at one time
- Loan periods appropriate for purpose of loan (e.g., trial, demonstration for training, replacement while borrower’s equipment being repaired)
- Conditions for extensions of loan period as appropriate due to individual needs and availability of equipment
- System for processing requests (e.g., handling requests, managing waiting lists, reserving devices, notifying customers of availability and response time to process requests).
- System for checking devices in and out (e.g., forms that list devices and all accessories checked out, length of loan, responsibility for maintaining device in secure location, responsibility for lost or damaged equipment, signature of client borrowing equipment etc.)
- Fees if applicable, including late fees.

Lending Procedures – Delivery of Devices
B3. Device loan programs are designed to ensure **effective methods** are in place so that consumers are able to obtain and return devices.

**Intent:** The device loan program offers multiple methods to obtain and return devices. If a consumer is unable to arrange to physically pick-up and/or return a device, the loan program provides an alternative option (e.g., shipping) to ensure pick-up and/or return in a reasonable timeframe.

**Key Considerations:** The device loan program has written procedures to ensure:
- Delineation of process for pick-up/shipping and return of equipment to the inventory.
- Delineation of borrower responsibilities for returning devices (e.g., returning in person or via shipping).
- Delineation of who pays shipping/handling and insurance costs (if needed).

**Accessibility of Program**

**B4. Device loan programs are physically and programmatically accessible to consumers, employees, contractors, and volunteers.**

**Intent:** The device loan program and its subcontractors provide services in a facility that meets or exceeds ADA standards for public access.

**Key Considerations:** The device loan program:
- Is housed in a facility that complies with federal and state laws for physical accessibility.
- Is housed near a location served by public transportation.
- Provides for telecommunications access via TTY or similar text transmission.
- Upon request, provides accommodations (e.g., ASL interpreters, assistive listening) to ensure consumers can access the program services.

**Accessibility of Program Materials**

**B5. Device loan programs use accessible program materials.**

**Intent:** The device loan program materials are a public face for potential consumers to the program and thus need to be accessible for people of all disabilities. Program materials must be made accessible to meet the needs of people of all disabilities.

**Key Considerations:** The device loan program has:
• Materials available in alternative and accessible formats.
• Materials available in different languages, as appropriate.
• Materials reflect culturally competent practices.
• Website meets or exceeds Section 508 standards.

Risk and Liability
B6. Device loan programs have **strategies to mitigate risks and liabilities**.

**Intent:** The device loan program is pro-active in avoiding and/or minimizing potential legal or financial liability, especially programs that loan mobility and weight-bearing devices.

**Key Considerations:** The device loan program has:
• Assessed its exposure to risk and/or liability.
• Implemented procedures to mitigate risk and/or liability.
• Identified appropriate types of insurance to address risk and/or liability.
• Obtained appropriate levels of insurance coverage in all needed areas to address risk and/or liability.

Software Licensing Compliance
B7. Device loan programs **comply with copyright laws and software licensing agreements**.

**Intent:** The device loan program is proactive to ensure compliance with copyright laws and licensing agreements in order to minimize potential legal and financial liabilities.

**Key Considerations:** The device loan program has written policies and procedures that:
• Ensure staff is trained on current copyright laws.
• Comply with copyright laws.
• Comply with software publisher’s licensing agreements.
• Inform consumers on terms of use.
• Safeguard copyright laws (e.g. use of demo copies of software).
• Provide for tracking of the purchase and assignment of licenses.
• Provide a quality assurance mechanism to ensure consistent application of procedures.

Protection of Assets
B8. Device loan programs have **strategies to protect their assets by managing the inventory in a responsible manner**.
**Intent:** The device loan program analyzes the costs of various asset protection strategies (such as insurance, security systems, and maintenance contracts) and implements actions based on these cost benefit analyses.

**Key Considerations:** The device loan program:
- Implements written procedures that document the processes used to protect inventory from loss and damage.
- Implements procedures to secure inventory.
- Conducts cost benefit analysis on purchasing insurance and acts based on that analysis.
- Conducts cost benefit analysis on purchasing extended warranties for equipment and acts based on that analysis.
- Has a quality assurance mechanism to ensure consistent application of procedures.

**Reduce Loss and Damage**

B9. Device loan programs have procedures in place that delineate the consumers’ responsibility regarding the loss and damage of equipment.

**Intent:** When the equipment is on loan to the consumer, the device loan program seeks to prevent and/or minimize loss and damage of equipment by conveying responsibility to consumers.

**Key Considerations:** The device loan program has written procedures that address:
- Consumer responsibility for maintaining device security, charging equipment properly, and accounting for all components.
- Consumer responsibility regarding loss of devices or component parts, breakage of devices, and theft of devices.
- Delineation of conditions for suspension of borrowing privileges and conditions for reinstatement, which include due process for borrowers.

**Volunteers**

B10. Device loan programs have procedures for training and supervising volunteers.

**Intent:** Volunteers in device loan programs may perform critical roles for which they are trained and supervised in a manner similar to paid staff.

**Key Considerations:** The device loan program has written procedures that:
- Define roles and responsibilities for volunteers.
• Provide systematic training for volunteers that include safety, privacy, and customer service issues.
• Ensure that volunteer activities are managed by a program employee.

Marketing

B11. Device loan programs employ broad strategies to market the program to consumers.

**Intent:** A comprehensive marketing plan considers consumer demographics and needs, as well as funding and other resources available. It incorporates varied strategies to reach audiences. It also has mechanisms, such as data collection, to evaluate the results.

**Key Considerations:** The device loan program:
• Has developed a marketing plan based on analyzing the markets it serves.
• Uses multiple strategies including at least one web-based strategy to market the program (i.e., brochures, posters, website, social networking, events, collaborative partnerships).
• Targets underserved populations.
• Uses accessible marketing materials
• Uses people first language.
• Regularly evaluates the results of marketing activities and adjusts marketing based on the evaluation.
Area C. Inventory

Current and Available Technology
C1. Device loan programs ensure that their inventories include current available technology.

**Intent:** The device loan program regularly evaluates its inventory to ensure it is available for purchase and supported by manufacturers.

**Key Considerations:** The device loan program has procedures for:
- Selecting devices to build the inventory to ensure the currency and availability of devices.
- Updating inventory and upgrading technologies.
- Identifying and removing old technologies, including those subject to recall by the manufacturer.
- A quality assurance mechanism to ensure consistent application of procedures and currency/availability of devices.

Purchase of Devices
C2. Device loan programs consider multiple sources of information to ensure that their inventories meet consumer and program needs.

**Intent:** The device loan program’s purchasing decisions are guided by consumer demand, program mission, regional/statewide resources, state demographics, and funding considerations.

**Key Considerations:** The device loan program:
- Has written procedures that describe how a program makes purchasing decisions.
- Regularly analyzes sufficiency of the inventory to meet consumer needs.
- Prioritizes acquisitions based on the analysis.

Disposal of Devices
C3. Device loan programs dispose of end-of-life and non-usable equipment/AT in a manner that complies with environmental law and regulations.

**Intent:** The device loan program has procedures for disposing of items that can no longer be used as whole devices or be broken down for spare parts. The procedures are written to protect the program from liability for violation of environmental laws.
**Key Considerations:** The device loan program has:

- Written procedures that describe how the program determines which devices to dispose of and how to dispose of the devices.
- Written procedures that comply with agency and funder procurement policies.
- Service agreements with recyclers that comply with environmental regulations.

**Inventory Control/Tracking**

**C4.** The device loan programs use accurate and efficient methods to track the inventory.

**Intent:** Appropriate methods of inventory tracking are utilized to capture device information, keep accurate financial records, and determine the availability of specific types of devices.

**Key Considerations:** The device loan program has an inventory management system that:

- Uses a unique identifier for every device (e.g., paper labels, bar code, etc.).
- Tracks device names and/or manufacturer and version.
- Categorizes devices by functional need.
- Can determine the availability (and when applicable, location) of devices.
- Assigns an inventory valuation (replacement value) to each device.
- Tracks repairs made on individual devices.
- Tracks devices borrowed and length of loans.

**Maintenance of Equipment**

**C5.** Device loan programs ensure that devices in their inventory are in loan-ready condition.

**Intent:** The device loan program has procedures in place to ensure that the inventory of equipment/software is clean, fully operational, and has all accompanying parts and accessories present.

**Key Considerations:** The device loan program:

- Has written procedures that detail how devices are checked and prepared for loaning.
- Checks and prepares devices prior to loaning.
- Inspects and cleans devices.
- Trains staff in inspection and cleaning procedures (in accordance with manufacturer recommendations, where applicable).
- Regularly charges equipment as required.
- Has a quality assurance mechanism to ensure consistent application of procedures.

Storage of Equipment

C6. Device loan programs have adequate, organized space to store equipment efficiently in a secure location.

**Intent:** The device loan program efficiently organizes, secures, and stores equipment for program use. Equipment is stored in environmental conditions that will not impair the functionality or longevity of the equipment.

**Key Considerations:** The facility has adequate secure space to:
- Separate and store different types of devices.
- Optimize the use of space with shelving, bins or other storage options.
- Separate cleaned, loan-ready equipment from devices requiring repair or cleaning.
- Provide proper heating, cooling and ventilation for equipment storage as needed.

Relationships with Suppliers and Manufacturers

C7. Device loan programs collaborate with suppliers and manufacturers of the assistive technology in the program inventory.

**Intent:** The device loan program maintains good relationships with suppliers and manufacturers to promote better outcomes for consumers. Collaborative relationships benefit both parties, potentially allowing more consumers to have access to the AT they need.

**Key Considerations:** The device loan program collaborates with suppliers or manufacturers to:
- Establish resources for repairs of AT.
- Refer consumers to suppliers and manufacturers who have loan and/or rental programs when devices are not available to the loan program.
- Identify potential funding sources when rent is required.
Area D. Support for Borrowers

Training for Borrowers
D1. Device loan programs ensure that consumers receive information and guidance on device features, operation, maintenance, safety and troubleshooting.

Intent: The device loan program provides borrowers with various means to receive information on how to use a loaned device. This may include but is not limited to accessible instructional materials, quick start guides, videos, DVD/CDs, webinars, websites, and identification of a person to provide support to the borrower.

Key Considerations: The device loan program:
- Provides instructional training materials in alternate and accessible formats.
- Provides information on the features and safe operation of the device.
- Provides information on basic maintenance procedures for the device.
- Provides information on troubleshooting and support techniques.
- If needed, identifies a person or company to provide support (e.g., staff members, manufacturers, representatives).

Comprehensive Referrals
D2. Device loan programs are able to provide comprehensive referrals to other sources of information or assistance.

Intent: The device loan program has up-to-date resources that promotes consumer choice by providing the consumer with sufficient information to contact sources directly to obtain additional information or services.

Key Considerations: The device loan program:
- Has written procedures to ensure consumer choice through unbiased referrals that include multiple options when available and provide notice to consumer that referrals do not constitute endorsement.
- Provides information about national, state and local assistive technology suppliers, providers, and other services.
- Provides information about and referral to funding sources for assistive technology.
- Provides information about AT professionals and service providers, such as evaluators and rehabilitation engineers.
- Has mechanisms for ensuring the referral information is up-to-date.
- Has mechanisms for ensuring the referral sources offer quality services/information.
- Has information to assist consumers in selecting and interacting with entities to which they are referred.
Area E. Program Evaluation

Data Collection
E1. Device loan programs **collect and report cumulative data** about devices, consumers, and outcomes.

**Intent:** The device loan program collects and reports on the total number of short term device loans made by primary purpose of the loan, the number of device loans by type of borrower, length of short term device loans, types of devices loaned, consumer satisfaction, and performance measures for the purpose of making a decision.

**Key Considerations:** The device loan program:
- Has data systems that collects needed data.
- Trains personnel to use data collection systems.
- Collects data in systematic manner to ensure they are reliable and accurate.
- Submits needed data within required deadlines through external data collection systems.

Use of Program Data
E2. Device loan programs **use data to improve services**.

**Intent:** The device loan program measures results in order to set goals and measure progress.

**Key Considerations:** The device loan program:
- Uses data collected on device loans to drive device purchase.
- Uses data to judge whether the program is statewide and comprehensive.
- Works with the advisory council to make programmatic changes based on loan program data.
Appendix A: Description from the Instruction Manual for Annual Report for State Grant Program

Device Loan Description
These are short-term loans in which a consumer can borrow an AT device for a period of time. The purpose of the loan may be to assist in decision making, to serve as a loaner while the consumer is waiting for device repair or funding, to provide an accommodation on a short-term basis, or for other purposes. “Other” purposes include: (1) self-education by a consumer for the purpose of later decision making (e.g., when the school year begins); (2) self-education by an intermediary (e.g., a teacher) whose purpose is to become familiar with the device; and (3) training.
Appendix B: Passages from the Assistive Technology Act of 1998
as amended, Public Law 108-364

(i) **Device Loan Programs** - The State shall directly, or in collaboration with public or private entities, carry out device loan programs that provide short-term loans of assistive technology devices to individuals, employers, public agencies, or others seeking to meet the needs of targeted individuals and entities, including others seeking to comply with the Individuals with Disabilities Education Act, the Americans with Disabilities Act, and section 504 of the Rehabilitation Act.

(ii) **Comprehensive information**.--The State shall directly, or through referrals provide to individuals, to the extent practicable, comprehensive information about State and local assistive technology vendors, providers, and repair services.

**Definition: Comprehensive Statewide Program**
Comprehensive statewide program of technology-related assistance.--The term `comprehensive statewide program of technology-related assistance’ means a consumer-responsive program of technology-related assistance for individuals with disabilities, implemented by a State, and equally available to all individuals with disabilities residing in the State, regardless of their type of disability, age, income level, or location of residence in the State, or the type of assistive technology device or assistive technology service required.

**Definition: Assistive Technology**
(3) **Assistive technology**.--The term `assistive technology' means technology designed to be utilized in an assistive technology device or assistive technology service.

(4) **Assistive technology device**.--The term `assistive technology device’ means any item, piece of equipment, or product system, whether acquired commercially, modified, or customized, that is used to increase, maintain, or improve functional capabilities of individuals with disabilities.

(5) **Assistive technology service**--The term `assistive technology service’ means any service that directly assists an individual with a disability in the selection, acquisition, or use of an assistive technology device. Such term includes--
(A) the evaluation of the assistive technology needs of an individual with a disability, including a functional evaluation of the impact of the provision of appropriate assistive technology and appropriate services to the individual in the customary environment of the individual;
(B) a service consisting of purchasing, leasing, or otherwise providing for the acquisition of assistive technology devices by individuals with disabilities;
(C) a service consisting of selecting, designing, fitting, customizing, adapting, applying, maintaining, repairing, replacing, or donating assistive technology devices;
(D) coordination and use of necessary therapies, interventions, or services with assistive technology devices, such as therapies, interventions, or services associated with education and rehabilitation plans and programs;
(E) training or technical assistance for an individual with a disability or, where appropriate, the family members, guardians, advocates, or authorized representatives of such an individual;
(F) training or technical assistance for professionals (including individuals providing education and rehabilitation services and entities that manufacture or sell assistive technology devices), employers, providers of employment and training services, or other individuals who provide services to, employ, or are otherwise substantially involved in the major life functions of individuals with disabilities; and
(G) a service consisting of expanding the availability of access to technology, including electronic and information technology, to individuals with disabilities.
Appendix C: Categories of Functional Need from the Instructional Manual for the Annual Report for State Grant for Assistive Technology Program

Throughout the reporting system you are asked to classify the devices provided. There are 10 categories for classifying devices and disabilities by functionality:

- Vision
- Hearing
- Speech communication
- Learning, cognition, and developmental
- Mobility, seating, and positioning
- Daily living
- Environmental adaptations
- Vehicle modification and transportation
- Computers and related
- Recreation, sports, and leisure

Definitions

- Vision: Products designed to assist with vision.
- Hearing: Products designed to assist with hearing.
- Speech Communication: Products designed to assist with speaking and face-to-face communication for individuals with speech disabilities.
- Learning, Cognition, and Developmental: Products to provide people with disabilities with access to educational materials and instruction in school or other environments; products that assist with learning, and cognition.
- Mobility, Seating, and Positioning: Products whose main focus is on augmenting or replacing the functional limitations of an individual’s mobility.
- Daily Living: Devices that enhance the capacity of people with disabilities to live independently, especially AT that assists with Instrumental and other Activities of Daily Living (ADLs, IADL’s) such as dressing, personal hygiene, bathing, home maintenance, cooking, eating, shopping, and managing money.
- Environmental Adaptations: Environmental and structural adaptations to the built environment that remove or reduce barriers and promote access to and within the built home, employment and community facilities for individuals with disabilities. Environmental adaptations usually involve building construction, engineering, and architecture, but also include environmental controls and switches that can control
• a large portion of or an entire living environment. Environmental adaptations are typically permanent structures, modifications or additions.

• Vehicle Modification and Transportation: Products that give people with disabilities independence and enhance safety in transportation through adaptation of vehicles.

• Computers and Related: Hardware and software products that enable people with disabilities to access, interact with, and use computers at home, work, or school. Includes modified or alternate keyboards, switches activated by pressure, touch screens, special software, voice to text software.

• Recreation, Sports, or Leisure Equipment: Products not already classified in other categories that help persons with disabilities participate in sport, health, physical education, recreation, leisure, and dance events.