NFBEI Justification

The California Vendors Policy Committee requested that the Department use our professional services money to purchase National Federation of the Blind’s Entrepreneurial Services (NFBEI). Forty-one states, and Washington DC, subscribe to this service - that’s forty-two SLAs. The Department rejected this request, stating the Department already provides those services. Our elected committee has been tasked with justifying the purchase. We do not agree with the Department. There are aspects of the service that the Department attempts to provide, and fails, and others that it simply does not provide. Here are some examples:

Access to experts who can give technical assistance to our management and CVCP on Randolph-Sheppard issues. This is vital for both groups, especially with the consideration of all the new staff not completely adept with the Randolph-Sheppard Act.

A once-a-year, in-person site visit by a National Association of Blind Merchants (NABM) expert to update the Department and vendors on key Randolph-Sheppard national issues affecting state programs. This is something we do not hear from the Department on, and is important for the strength of the program.

Training and consultation to the elected committee. The Department has never provided training to the elected committee on how to write policies and procedures. On the subject of consultation, it would be a conflict of interest for the Department to consult the elected committee on matters we do not agree on. This is of high importance to the elected

committee. We do not have lawyers or experts to consult with, and it would be beneficial to both sides if we were directed properly.

Assistance with writing rules. Terry Smith and NABM have, for many years assisted many states on writing rules. Rather than attempt to have BEP vendors and a great deal of newly hired Department employees work on updating rules, we can have an expert’s assistance.

The opportunity to contract with NABM to conduct part or all of BEP’s annual educational training conference. The value in this is that education and training is key to the strength and vitality of the program. Our past trainings have been lacking in substance and even worse, we’ve had no training for the last three years, which is in violation of the law. NABM will provide speakers and structure that are second to none in the nation.

NABM can help with developing a strategic plan. We do not have a strategic plan that any of us know of. Again, this is something the Department has not provided and is a necessary tool for measuring goal attainment.

These are several examples of why the Department’s statement, that they provide the services that we would like from NFBEI, is simply wrong. I believe the California BEP’s staff leadership has the best interest of our vendors in mind, and I appreciate their collaboration and dedication to making this a better program, but in these unprecedented difficult times, we need all the expert input we can get.

Thank you.

Max P. Duarte

CVPC Chair

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This information is being presented to the department as the CVPC’s justification for requesting training and consulting services from NFBEI on a year-to-year subscription basis regarding RSA and other vendor related

Issues.