

Kentucky Commission on the Deaf and Hard of Hearing

Matthew G. Bevin Governor

Derrick K. Ramsey Secretary, Education and Workforce Development Cabinet Virginia L. Moore Executive Director

# MEMORANDUM

- **DATE:** July 1, 2018
- TO:David Byerman, DirectorLegislative Research Commission

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CC: Derrick Ramsey, Secretary Education and Workforce Development Cabinet

> Michael J. Schmitt, Chairman Public Service Commission

- **FROM**: Virginia L. Moore, Executive Director Kentucky Commission on the Deaf and Hard of Hearing
- **RE:** Telecommunications Access Program (TAP) Annual Report for Fiscal Year 2017 2018

Per KRS 163.527, the Telecommunications Access Program (TAP) Annual Report for the fiscal year (FY) 2017 - 2018 is to be submitted to the Kentucky General Assembly through the Legislative Research Commission on July 1<sup>st</sup> of each year the program is in operation.

If you have any questions, please contact me at <u>Virginia.moore@ky.gov</u> or at 502-573-2604.



# The Kentucky Commission on the Deaf and Hard of Hearing

Since its inception in 1995, the Telecommunications Access Program (TAP), administered by the Kentucky Commission on the Deaf and Hard of Hearing (KCDHH), has strived to serve the almost 700,000 deaf, hard of hearing, and speech impaired consumers in Kentucky (17% of the population) that apply through TAP for specialized telecommunications equipment. From time to time, we receive letters of thanks from grateful recipients. Below are some of the excerpts from FY 17-18.

"I live in Eastern Kentucky and I'm deaf. With the changes the TAP has made I'm now abele to access services in my home area, and I can pay for what I can afford rather than a set monthly bill."

(Deaf consumer – Pineville)

"I want to thank you for what you do at your agency. I love my amplified phone and it helps me stay in touch with my friends and family. Bless all of you."

(Severely Hard of Hearing consumer – Jamestown)

"I'm so grateful for the iPhone you helped me acquire from the TAP. I thought I was too old to learn how to use it, but now I take it everywhere. It helps me with captions on the go and also allows me to see text when someone is talking to me so I know what they are saying. The apps you put on these phones are amazing and have really opened up my life again. Thank you!"

(Late deafened consumer – Bardstown)

"Thank you for the iPad you gave my teenage son. He can keep up with things in school much better now and he loves the independence it gives him with his friends and classmates. It helps him make phone calls and to communicate with his peers after school hours."

(Deaf consumer – Belleview)

"I wanted to write and let you know that the iPad I received with special apps has allowed me to speak to people again after my cancer surgery. I was sad and didn't want to go out of the house, but now I can use my iPad to communicate with almost anyone. Thank you for saving the rest of my life!"

(Speech Impaired consumer – Lexington)

### Telecommunications Access Program Annual Report Fiscal Year 2017 - 2018

### Kentucky Commission on the Deaf and Hard of Hearing Virginia L. Moore, Executive Director

In compliance with KRS 163.527, this annual report is submitted to the Kentucky General Assembly through the Legislative Research Commission.

"The Commission on the Deaf and Hard of Hearing shall provide to the General Assembly an annual report on the operation of the Telecommunications Access Program (TAP). The report shall be due on July 1 of each year, beginning July 1, 1995, and, at a minimum, provide:

- "The number of persons served and the number of TDDs (equipment) distributed;
- The revenues and expenditures of the program;
- Discussion of any major policy or operational issues;
- Any changes the Commission plans to make in the program that does not require legislative action; and
- Any proposals for legislative changes in the program."

### The number of persons served and the number of STE's distributed:

The Telecommunications Access Program (TAP) processed 958 applications during FY18. The status of those applications for Specialized Telecommunication Equipment (STE) is as follows as of 6/29/2018. Definitions of the statuses are below:

Status	Total
Approved	113
Complete	629
Incomplete	75
Denied	76
Ready for Review	7
Total	958

### **DEFINITIONS:**

**Approved** - Applications are considered approved once the last piece of documentation required is received. As of that date, they placed on a waiting list and are ordered on a first come first served basis depending on availability of funds. Also included in approved is equipment that has been ordered but is pending delivery, or has yet to be paid for during the FY.

**Complete** - Applications are considered complete once they are approved, the STE has been ordered, delivered to the consumer and paid for during the FY.

**Incomplete** - Applications are incomplete if they are pending receipt of missing verification required to determine eligibility. Applicants have been notified to provide the missing information to complete their application within the 12 month timeframe.

**Denied** – Applications are considered denied because they did not meet eligibility requirements to receive the STE. Notification has been sent to the applicant explaining why they are ineligible, and when they might be eligible to reapply if applicable.

**Ready for Review –** These applications have already been reviewed at two levels and are pending the last supervisory review to ensure that all eligibility criteria is met per regulations. After a final review, they are moved to approved applications.

**629** consumers received **891** pieces of equipment during FY18. Consumers that received equipment are broken down by degree of hearing/speech loss as listed below:

Degree of Hearing Loss	Total
Deaf	157
Deaf w/ Limited Vision/Deaf Blind	1
Hard of Hearing w/ Limited Vision	39
Hard-of-Hearing	225
Late-Deafened	1
Severely Hard-of-Hearing	159
Speech-Impaired	47
Total	629

The Public Service Commission (PSC) collects funds for TAP and the Telecommunications Relay Service (TRS) through a small surcharge on all telecommunication access lines and distributes those funds as appropriated to KCDHH to administer the TAP, and distributes funds to the state contracted Relay provider (Hamilton Telecommunications, Inc.) to administer Relay within the state.

During FY17-18 the TAP did not add any new equipment but we continue to serve all applicants with a hearing loss, hearing and vision loss, or speech loss. The iPhone and iPad continue to be the most popular devices, as they meet the broadening communication needs of consumers with a hearing loss that consider themselves deaf, hard of hearing, speech impaired or vision impaired. With the preloaded specialized apps, these devices provide communication access to eligible applicants. Signaling devices are necessary to recieve phone calls, with the added benefit of reconnecting with a smoke/CO2 detector for their home safety. New applicants are served first, and then reapplicants can be served again, once every four years, as funds permit.

The number of incoming applicants increased slightly during FY 17-18 as we partnered with other agencies to educated consumers regarding services. During outreach we continue to identify consumers we could have served, but were unable to serve because broadband was not available or affordable in their area. This continues to be a barrier to utilizing specialized equipment in rural areas and we are deeply concerned for their safety, as during emergency situations these individuals have no means of communicating outside their landlines, which may not be in service during a true emergency.

# **Public Relations:**

Television advertisements by Hamilton, our state Relay Provider, run twice a year showcasing Captioned telephones. These advertisements always increase the number of applications for that device. Hamilton continues to partner with us to provide state outreaches and trainings for devices utilizing the Relay service. Partnership events, including the state fair booth and word of mouth from professionals and other applicants provides us with additional application requests. We constantly reach out to professionals that serve our population to keep them apprised of the resources we offer to improve communication for deaf, hard of hearing and speech impaired Kentuckians.

Although the program has been in operation for twenty-three years, there continues to be consumers across the state that are unaware of the TAP or our agency as a whole.

The grid below analyzes the effectiveness of the public relations methods utilized to advertise the TAP. Adjustments are made accordingly each FY to utilize the most effective means of advertising for the next FY, depending on the trends we recognize.

TAP Counts												
Final Count for Fiscal Year July 1, 2017 to June 30, 2018 A Statistical Analysis to Help Determine Best Methods of Advertising												
How did they hear about the TAP Program?												
	Applied before	TV Ad	Billboard	Radio	Outreach	A friend	Web site	Newsletter	Facebook	Referral	Other	TOTAL
FYC*	377	6	4	1	255	216	57	3	8	419	194	1,540
*FYC: "Fiscal Year Count" - These final counts are for the fiscal year, July 1, 2017 to June 30, 2018												
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### Revenues and Expenditures of the Telecommunications Access Program For fiscal year 2017 – 2018

REVENUE	Budgeted Expenditures	Actual Expenditures	
FY 2017– 18 Allotment	1,109,600	1,109,600	
Total Revenue collected	1,109,600	1,109,600	
PERSONNEL EXPENSES			
State Employee Salary	185,000	182,069	
State Employee Benefits	130,600	133,077	
Other Personnel Services	45,600	46,557	
Other	28,400	27,425	
Total Personnel Services	389,600	389,128	
OPERATING EXPENSES			
Utilities	5,100	4,179	
Other Rentals	36,000	35,734	
Maintenance and Repairs	0	0	
Postage Services	10,500	7,141	
Miscellaneous Services	24,000	24,871	
Telecommunications	12,200	8,804	
Computer Services	18,500	2,986	
Supplies	9,400	7,152	
TAP Commodities	11,000	32,745	
TAP Equipment Purchases	525,000	531,629	
Travel Expense/ Allowances	22,700	22,778	
Miscellaneous Commodities	45,600	42,453	
Total Operating Expenses	720,000	720,472	
TOTAL EXPENSES	1,109,600	1,109,600	
13-33-340-TBOO BALANCE AS OF 6/30/18	0	0	

Below is a grid showing the number of units distributed for each piece of equipment available during FY 17-18. Those no longer available remain on the grid for historic purposes in our database:

STE (Telephone equipment) ALL TYPES and replacement of discontinued models	Units
AMPI ER	4
Amplicom Powertel 785	6
CAPTEL 2400iBT	11
CAPTEL 840 Plus	18
CAPTEL 840i	13
CAPTEL 880i LOW VISION	3
Clarity XLC 3.4 - White Cordless	64
Clarity XLCC7BT	27
Geemarc AMPLIPOWER 60 - Black Corded	23
Panasonic KX-TGM450S	2
Telitalk Speech Aid EMOTE telephone	6
WCSC 600 - White Corded	50
AMPI ER	4
Amplicom Powertel 785	6
CAPTEL 2400iBT	11
CAPTEL 840 Plus	18
CAPTEL 840i	13
CAPTEL 880i LOW VISION	3
Clarity XLC 3.4 - White Cordless	64
IPAD 5 DB/Low Vision Wifi 2yr	7
IPAD 5 Deaf/HOH Wifi 2yr	87
IPAD 5 Speech Impaired Wifi 2yr	23
IPAD MINI 4 Deaf/HOH Wifi 2yr	12
IPAD Mini 4 Speech Impaired Wifi 2yr	13
IPHONE D/HH 2yr	244
IPHONE Plus D/HH 2yr	14
IPHONE Plus DB/LOW VISION 2yr	2
*Total telecommunications devices	629
Signaling Devices	
CA-360 package	81
CA-380 package	143
Serene Wireless Bed Shaker	2
Krown TA005 Visual Combo Signaler	36
*Total Signaling Devices	262
*Total # of all Equipment distributed	891

### Discussion of any major policy or operational issues:

As KCDHH is the only centralized, non-biased source of information regarding issues related to hearing loss, our ability to provide information, referrals and advocacy, as well as specialized telecommunications equipment for the citizens of the Commonwealth is an essential service to the general public. TAP staff strives to provide the most technologically advanced telecommunications equipment possible, so we can serve our constituents transitioning communication needs. The TAP is committed to improving the quality of life for the deaf, hard of hearing, speech impaired or deaf/hoh w/vision loss citizens throughout the Commonwealth.

TAP equipment vendor contracts were renewed in April 2018, as year three of a five year contract awarded under RFP guidelines through the Finance Cabinet. Some equipment changes were required and some model changes were made this FY. As a result of the current equipment offerings the program brochures and webpages have been updated with new devices and staff has been trained on how to demonstrate the current equipment effectively. The contract for iPhone distribution was switched from AT&T to an unlocked device that can be activated with any provider, major or prepaid.

Regulations governing the TAP were amended in April, per the requirements of House Bill 50 which passed in the 2017 legislative session. Updates included additional definitions, updated procedures and incorporation of the revised TAP application, including an online application accessible via the KCDHH website. Vendor procedures repair and warranty procedures and delivery times were also updated. The amended regulations are in the final stages of passage and are expected to be final in early August.



The eight TAP demonstration cabinets throughout the state have been updated with equipment during the Spring of FY18, and local staff has been trained to demonstrate the specific equipment models in the cabinet. These demonstration sites give consumers the opportunity to test equipment closer to home, before selecting their device, as equipment cannot be exchanged once distributed. Partnerships with private, public and state agencies are utilized to neutralize the cost of housing the cabinets and staff to demonstrate the equipment.

Captioned Vlogs in American Sign Language (ASL) continue to be posted on the KCDHH website to explain the use of the various kinds of TAP equipment and any changes to the program policy or eligibility requirements. This provides information to our deaf constituents in their native language, ASL, and allows hard of hearing consumers to gain the information via captions. Total accessibility is mandatory in our production of any informational materials for KCDHH and TAP.

TAP staff utilizes Vlogs, videoconferencing, video relay interpreting, FaceTime, instant messaging, text messaging, interpreters and email, as well as traditional voice lines, snail mail and face-to-face contacts to promote the program and explain its requirements to consumers and professionals as well. TAP staff team up with the agencies' PR staff to do outreach that covers all the agency's programs and services.

The agency once again took advantage of the opportunity to meet people face-to-face at the 2017 Kentucky State Fair. In partnership with Hamilton Relay and Hearing Loss Association of Kentucky, a fully interactive booth was provided during the 10-day event and educated fairgoers on living with a hearing loss and resources available to those affected by it, including assistive technology. Direct referrals have dropped during the last two years as fairgoers are more reluctant to give us their personal information on site. Most prefer to call us at a later date and request information regarding the distribution of equipment. KCDHH has decided to skip a year at the State Fair in 2018 to allow us to focus on other projects and reduce the amount of time staff are out of the office to host this extended outreach. With agency budget cuts and personnel reductions it is becoming harder to commit to the full 10 days of the state fair.

The statewide outreach, called "Connect Kentucky", was completed in March 2018. This allowed us to work with the most rural areas to spread the word about TAP and KCDHH.

The TAP Advisory Board, which consists of consumers, agency oversight representatives and TAP staff, meets at least once annually face-to-face, twice if needed. During the October 2017 meeting topics discussed included vendor contracts, renewals, equipment additions and members were given revised brochures. The April 2018 meeting focused on TAP regulation changes in process and their impact on the program. Outreach is needed to encourage citizens to apply for specialized telecommunications equipment, especially in rural areas. Hamilton Relay provided an update on their outreach efforts and some individual training they have completed.

Last Name	First Name	Membership Status	Term Ends
Gordon-	Gerry	*KCDHH Commissioner/Advisory Board	2020
Brown	-	Chair	
Ziehr	Jeremiah	*Deaf Consumer	2021
Fowler	Lewis	*Deaf Consumer	2019
Lawson	Johnny	*Speech-Impaired Consumer	2021
Fenwick	Marilyn	*Hard of Hearing Consumer	2019
McGirt	Melinda	*Hard of Hearing Consumer	2019
Timon	James	*Hard of Hearing Consumer	2021
Stevens	Jim	**Public Service Commission	Law
		Representative	
Taylor	Jeannie	**KCDHH Commission Chair	Law
Campbell	Tyler	*KY Telephone Association	Law
		Representative	
Moore	Virginia	**KCDHH Executive Director	Law
Zulauf	Cole	***Program Coordinator	Staff
Endler-	Jessica	***Administrative Specialist II	Staff
Smith			
Crowe	Tashina	***Interpreter I	Staff

### **TAP Advisory Board Members**

\*voting members \*\*non-voting members, serve by law or ex-officio \*\*\*TAP staff

The Internal Policy Analyst III (IPA) supervised the TAP staff and served as legislative, regulatory liaison for the program till April 30, when she retired. The Executive Director provided guidance after that date, and will continue to do so until the vacancy is filled.

Staff serves on a variety of boards related to accessible technology and also serves on emergency notification teams to represent KCDHH in the state's efforts to bring NG911 to fruition and make wireless communication in emergencies a reality. Text messaging is the norm for most consumers with a hearing loss and 87% of the nation's disabled population utilizes wireless devices as their primary source of telecommunication. PSAPs must be fully accessible and text messaging is the most logical answer to that requirement, not only for our population but for hearing individuals that use mobile devices. KCDHH continues to work with state and federal entities to make this goal possible, including monitoring national legislation and supporting state legislation to make 911 services accessible to all citizens of the Commonwealth.

The Program Coordinator is a member of the Kentucky Association of the Deaf, Lexington Association of the Deaf and the Deaf Senior Citizens club in Lexington and Louisville, and attends meetings to promote TAP and to train consumers on equipment or policy changes.

# Staff members attended the following to promote the TAP during FY17-18:

Hearing Loss Association of America, Kentucky chapter meetings; Hearing Loss Association of America, national conference; Lexington Association of the Deaf meetings; Louisville Deaf Senior Citizens meetings; Kentucky Speech-Language Hearing Pathologists Association conference; Telecommunications Equipment Distribution Program Administrators conference; National Association of State Relay Service Administrators conference; National Association of State Administrators for Deaf and Hard of Hearing conference; Kentucky Audiologist Association conference: Kentucky Association of the Deaf conference; Kentucky Registry of Interpreters for the Deaf conferences: Registry of Interpreters for the Deaf National conference; Kentucky School for the Deaf (KSD) Family Learning Vacation; KSD Pancake Breakfast: KSD Gallaudet Alumni banquet: Paducah Barbegue Festival: Hillbilly Days - Pikeville: Infant & Toddler Institute on Deafness Conference; Early Hearing Detection and Identification conference; First Steps / Hands Alive events; Hands & Voices chapter meetings: Mental Health Advisory Board quarterly meetings/workshops/conference; Community and Senior Health Fairs statewide; Kentucky Police Academy trainings; Kentucky Sheriffs Association trainings; Kentucky Emergency Preparedness presentations/workshops; and Senior Citizen Association meetings statewide.

# Statistical Update:

- Approximately 15% of American adults (37.5 million) aged 18 and over report some trouble hearing. About 28.8 million U.S. adults could benefit from using hearing aids. *(Centers for Disease Control and Prevention)*
- 60% of childhood hearing loss is due to preventable causes. (World Health Organization)
- Unaddressed hearing loss poses an annual global cost of 750 billion dollars. This includes health sector costs (excluding the cost of hearing devices), costs of educational support, loss of productivity, and societal costs. Interventions to prevent, identify and address hearing loss are more cost-effective and can bring great benefit to the individual. (World Health Organization)
- Kentucky has almost 700,000 deaf and hard of hearing residents (16% of population). (National Health Interview Survey)
- Hearing loss ranks as the third most common health issue in the country, behind heart disease and arthritis. (National Institutes of Health)
- Kentucky ranks third per capita nationally in people identified as deaf or hard of hearing (17%). (American Community Survey Data, United States Census)
- About 3 out of every 1,000 children in the US are born deaf or hard-of-hearing. 90% of those children are born to hearing parents. (National Institute on Deafness and Other Communication Disorders)
- One in five teenagers (20%) incurs a hearing loss in life. (National Institutes of Health)
- 14.9 % of children between the ages of 6 and 19 have a hearing loss in one or both ears. (Centers for Disease Control and Prevention)
- 15% (26 million) of Americans between the ages of 20 and 69 have high frequency hearing loss due to exposure to loud sounds or noise at work or in leisure activities. (National Institute on Deafness and Other Communication Disorders)
- Nearly 33% of all American's over age 65 have a hearing loss. (*Hearing Loss Association of America*) which contributes to dementia, a greater incidence of balance problems and falls, and other stress related diseases such as heart attacks and strokes due to depression and isolation.
- Medicare Part B does not cover hearing aids for progressive hearing loss, only as a rehabilitation service for cases caused by a traumatic illness or accident. This leaves seniors to pay for their own hearing exams and hearing aids. Hearing aids are incredibly expensive, ranging from \$1,000 to over \$5,000 for <u>each</u> ear. Such a high price discourages seniors from seeking a very basic solution to their hearing loss that could dramatically improve their quality of life. (National Institute on Deafness and Other Communication Disorders). There are really no resources for adults to obtain assistance with financing hearing aids, leading to a very frustrated and isolated segment of today's population.
- More than 59,000 military veterans from Iraq and Afghanistan are on disability due to service-related hearing loss.1.5 million Veterans are receiving veterans' compensation for "profound unusable hearing." (United States Department of Veterans Affairs)

 The most prevalent service-connected disability for veterans was tinnitus and hearing loss (60%). (United States Department of Veterans Affairs)
Legislative Plans for FY 19:

A bill introduced in Congress, called the Over-the-Counter Hearing Aid Act of 2017 passed in the fall of 2017. The bill permits consumers with a mild to moderate hearing loss to selfdiagnosis themselves and purchase hearing aids from a non-medical retail store. The hearing aid devices are "defined" by the Food and Drug Administration, and the bill is geared to lower the cost of hearing aids for a majority of consumers. Our fear however is that consumers will not be fitted correctly by distributors and will not have the follow up or adjustment capabilities that are now available through licensed audiologists and hearing instrument specialists. Consumers "self-diagnosing" themselves as having a mild to moderate hearing loss is a frightening thought, and if applied to children could cause more damage to their hearing in the future. The bill has yet to be implemented fully and KCDHH continues to follow the process through promulgation of regulations.

In November of 2014 the Federal Communications Commission (FCC) implemented a Federal Register ruling effective January 2016, stating that hearing aids cannot be denied by insurance based on age as it is discriminatory. Federal Register, Vol. 79, No. 228, Part III, Page 70722-70723 <u>https://www.gpo.gov/fdsys/pkg/FR-2014-11-26/pdf/2014-27858.pdf</u> The ruling prohibits discrimination based on present disability and states that age limits are discriminatory when applied to services that have been clinically effective at all ages. In the ruling an example was given, that **hearing aids cannot be denied coverage based solely on age or it is considered discrimination.** The ruling also instructed "Issuers" that they should not attempt to circumvent coverage of medically necessary benefits for adults. However, insurance companies still ignore this ruling and refuse on a consistent basis to provide coverage of hearing aids. KCDHH continues to advocate for consumers who have requested coverage of hearing aids through their insurance providers and been denied. This is an ongoing battle at both the state and federal level and our wish is that coverage for hearing aids would be passed at the state level.

### Plans for FY 19, not involving Legislative changes include:

TAP is administered per KRS 163.525 and continues to grow as demand increases and technology changes to meet the needs of communication access. The selected device(s) provide affordable, portable, reliable and accessible telecommunications for all eligible applicants. Regulations are in place outlining criteria for approving applications, a processing system for vendor participation and specifying maintenance and repair procedures. Amendments also included revisions to the TAP application, including implementation of an on-line application to meet the demands of today's information age. Regulation amendments will be finalized in early August.

KCDHH works with the Commissioner of the Kentucky Department of Education to ensure that accurate and thorough hearing screenings are completed at the required grade levels to identify students with a hearing loss. Without proper identification at an early age, available resources for dealing with a hearing loss and accommodations in the school systems, children cannot acquire language timely and will have delays in school throughout their lifetime. As a new Commissioner was appointed in March, new partnerships will be forged in FY19 to ensure that children's language acquisition continues to improve in the public school system.

KCDHH continues to work with emergency service providers, PSAPs and other entities involved in upgrading the NG911 system to accept text messaging as a means of contacting services for assistance during an emergency. Federal Law mandated PSAP's to have this ability by 2015 but Kentucky's emergency providers requested an extension, to acquire funding to implement the provisions. Local entities should seek state and federal funding to ensure that technology is brought up to speed and local law enforcement is able to serve all citizens during an emergency situation through NG911.

The Administrative Specialist II and Interpreter I plan to attend the National Telecommunications Equipment Distribution Program Association (TEDPA) conference to be held in September 2018 in Minnesota. This conference showcases emerging technology from a variety of vendors and provides an opportunity to network with other state program managers to improve services to our consumers, as well as learn of Federal changes in regulations. Kentucky is highlighted at this conference as a leader in providing the most advanced telecommunications equipment. Many states have adopted Kentucky's wireless distribution policy in recent years and have added appropriate devices to their distribution programs because of the success of Kentucky's TAP.

### Outreach Plans for FY19 include partnerships with the following entities:

Hamilton Telecommunications Relay Service; Kentucky Telephone Association; Kentucky Association of the Deaf; National Association of the Deaf Alexander Graham Bell Association: Hearing Loss Association of America; American Association of Retired Persons: Kentucky School for the Deaf; Kentucky Office of Vocational Rehabilitation: Kentucky Office for the Blind; Kentucky Assistive Technology Services Network; Kentucky Assistive Technology Loan Corporation; Kentucky Office of Aging; Kentucky Department of Education; Hands and Voices: Veteran's Affairs: Commission for Children with Special Health Care Needs; Speech-Language and Hearing Pathologist Association; First Steps: Hospitals across the state; Audiologists, Hearing Instrument Specialists; and Area Developmental Districts

What TAP accomplishes as a program, providing basic telecommunication services, goes to the core of what our consumers are able to give back to society. We impact the lives of these citizens by providing services that allow them to utilize

telecommunications, receive emergency notifications should a state or national emergency occur, and participate equitably in everyday work and life activities.