

## **10.03 RANDOLPH-SHEPPARD VENDING FACILITY PROGRAM**

### Background

The Randolph-Sheppard Vending Facility Program is a Federal Program administered by NYSCB. It provides employment for NYSCB consumers as Business Enterprise Program facility managers in federal buildings.

New York State has a similar program which provides business opportunities for NYSCB consumers as a sole proprietor in a retail facility in state buildings. Opportunities are also available in municipal and private buildings.

### Types of Retail Facilities

There are six types of Business Enterprise Program facilities that may be established:

1. Automatic: coin operated vending machines that are manager-operated
2. Vending Routes
3. Retail store: a facility that provides pre-packaged merchandise (candy, newspapers, tobacco, beverages, lottery, etc.).
4. "Express Stop" facilities: a facility that provides pre-packaged merchandise but may also provide prepared items (hot beverages, soups, hot dogs, microwaveable sandwiches, etc. and lottery).
5. Snack bar/deli - serving prepackaged or prepared-on-premises food and refreshment items.
6. Cafeteria - serving hot meals.

### Training Components:

There is a training program for individuals interested in the Business Enterprise Program. It has an on-line component and an onsite training which is conducted regionally. The Training Program qualifies individuals to own and operate the various types of facilities. Licensed Owner/Managers are provided additional training as needed based on available opportunities. Each training program is intended to be consumer-centered, having the flexibility to address each candidate's individual needs. However, each candidate must demonstrate the skills needed for successful facility management before being considered eligible for licensure. Because candidates are allowed to learn at an individual pace, the length of each training program may vary.

The training program consists of:

1. Hadley School Math and Business Courses

2. National Association of Blind Vendors (NABM) Business Enterprise Licensee Training Program (BEPLT)
3. Onsite Training/Internship

### Length of Training

Online courses are completed at the individuals pace however the NABM Business Enterprise Program Licensee Training must be completed within one year from start date.

### Definitions

The following terms, as defined, are used throughout this policy:

1. Business Enterprise Program Director - the Central Office Business Enterprise Program staff member responsible for all Business Enterprise Program operations
2. Candidate - a NYSCB consumer who has been referred to the Business Enterprise Training Program.
4. District Supervisor - a Business Enterprise Program staff member responsible for field operations in one of three Business Enterprise program districts; District Supervisors are located in Buffalo, Albany, and New York City.
5. Business Service Specialist/ or Food Service Specialist - a Business Enterprise Program staff member responsible for supervising Program members who manage a BEP facility and is actively involved in training.
6. BEP Training Manager; BEP owner/manager who has been selected to participate in the training of candidates at selected training sites.
7. BEP Training Program - the VR sponsored training program designed to teach individuals the skills needed to own and operate a BEP facility.
8. Licensure - signifies that an individual is eligible for consideration to own and operate a retail facility.
9. Program Member - an individual who is licensed and placed as a Business Enterprise Program facility manager or as an employee of a facility manager.
10. Hadley School for Professional Studies - for on-line business and math courses
11. National Association of Blind Vendors (NABM) Business Enterprise Program Licensee Training (BEPLT) – Business Enterprise training program administered by the Hadley School for the Blind, Forsythe Center for Employment and Entrepreneurship

## Training Program Requirements

All Business Enterprise Program retail business owner/managers are licensed by NYSCB to manage retail facilities. To meet the basic requirements for licensing, an individual must:

1. Be legally blind
2. Be a United States citizen
3. Be at least 18 years old
4. Successfully complete the BEP training program which includes an assessment, Hadley business and math, NABM Business Enterprise Program Licensee training, ServSafe training, and an onsite training and internship.

## Benefits

A member of the Business Enterprise Program is entitled to benefits which can include:

1. Small business ownership in a NYSCB administered BEP facility
2. Financial Distribution Program
3. Life insurance
4. Medical insurance premium reimbursement
5. Promotional opportunities

## Promotions

The retail management training program will provide, where possible and feasible, for the advancement of program members who merit and are interested in such advancement. Promotional opportunities become available through the promotional list and are filled following the promotional policy as in the BEP handbook.

## Rule

Being licensed as a manager does not guarantee placement as a manager or as an employee of a manager. Placement is subject to availability of positions and opportunities.

## The Business Enterprise Training Program

The Business Enterprise Training Program is designed to prepare NYSCB vocational rehabilitation consumers to become licensed BEP business owner/managers.

## Role of Vocational Rehabilitation Counselor

The Vocational Rehabilitation Counselor (VRC) is responsible for the identification and referral of individuals to the Business Enterprise Training Program. He/she is also responsible for service coordination for any individual referred to the Business Enterprise Training Program.

## Role of the District Supervisor

The role of the District Supervisor includes:

1. Determining if individuals are appropriate for the program
2. Accompanying those individuals interested in the Business Enterprise Program on visits
3. Obtaining criminal and background checks
4. Monitoring progress of candidates in the training program in conjunction with the counselor
5. Administering onsite training and internship programs
6. Determining training program completion.

## Required Personal Attitudes and Characteristics of BEP Candidates

Positive attitudes and characteristics are essential for success in the Business Enterprise Program. Before making a referral to the Business Enterprise Training Program, the VRC must first determine that a candidate meets the basic referral requirements. These requirements are:

1. U.S. citizenship and at least 18 years of age.
2. Willing to participate in Orientation & Mobility (O&M) training in order to successfully travel to and from training and worksite locations..
3. The ability to be independent in Activities of Daily Living - including personal hygiene, clothing management, and personal finances.
4. The ability to communicate effectively including the ability to keep notes and records for training and business purposes.
5. Must be able to accomplish required physical tasks of the job including long hours and physical labor.
6. The ability to utilize functional math skills, including addition, subtraction, multiplication, division, fractions, and decimals.
7. An awareness of the demands of self-employment as in the BEP program.
8. Some basic computer skills are a necessity for success and training will be provided to the level that is needed.
9. Self-motivated and self-reliant as well as having problem solving skills.
10. The interest in becoming a member of the Business Enterprise Program and a sole proprietor of a retail facility and enjoy working with people and the public.

Counselors should introduce the BEP program to consumers at intake and be sure to give the consumer any available appropriate literature.

If at any point the counselor and consumer identify BEP as a potential vocational goal a Self-Employment Inventory will be administered and discussed with consumer in addition to discussing the characteristics listed above.

The counselor should include a viewing of the BEP videos (on the website or available on disk) in this discussion.

### Actions Prior to a Formal Referral to BEP Training

The following steps should be taken before making a formal referral to BEP training:

1. The counselor will set up and attend a meeting with the consumer and the BEP District Supervisor for a general introduction to the program and how it works.

The BEP District Supervisor will be sure to cover the following information:

- General training overview and standard time frames
  - Discussion of current and projected store availability
  - Self-reliance component of being a sole-proprietor
  - Physical demands and long hours of store operation
  - General requirements of store management
  - Overview of employee management responsibilities
  - Working with the public, host agencies and the BEP
  - Security access and effect of criminal history
  - Lottery license and effect of criminal history
  - Need for background check and credit check
  - Effect of personal financial obligations on business success
  - Earning potential of a BEP career
  - Rewards of being a manager/business person
  - Rewards commensurate with the effort put in
2. The counselor will accompany the consumer on a visit to at least two BEP locations (newsstand and another store type). This will be arranged and conducted by the BEP District Supervisor so that any questions can be answered during the tour.
  3. The counselor will then meet with the BEP District Supervisor to review initial impressions and discuss any remediation that may be needed prior to a formal referral.

4. The counselor and consumer will meet and decide whether to continue with BEP as a vocational goal and whether to make a formal referral.
5. If pursuing BEP Training the counselor will arrange for an Adaptive Technology Center (ATC) readiness evaluation.

### Formal Referral to BEP Training

The following steps should be taken to make a formal referral to BEP training:

1. The counselor will complete the BEP Referral Form and attach the following:
  - Intake Summary or updated consumer summary
  - Proof of citizenship
  - ATC Readiness Evaluation Results
  - Self-Employment Inventory
  - Most recent eye report/eye medical report (should be within 2 years)
  - Pertinent assessments and vocational, psychological and or training reports as well as any other existing assessment or testing information available
  - Information regarding all support services, including counseling, which the consumer will be receiving during training
2. The counselor will submit the referral to the local District Supervisor (BEP will respond to the counselor within 4 weeks of receipt of the referral).
3. The counselor and consumer should discuss and address any O&M or Vocational Rehabilitation Teacher (VRT) needs prior to the start of the assessment or training.
4. The counselor and consumer should also discuss and address any equipment needs prior to the start of the assessment or training. However, if at any time during the assessment or training, if it is felt by BEP staff that adaptive equipment should be considered, the BEP staff should discuss the need with the counselor, prior to discussing it with the consumer, and appropriate recommendation and purchasing procedures will be followed by the counselor.
5. BEP Staff will arrange a criminal record background check and a credit check (a criminal record does not prevent participation in training but can restrict placement. Federal locations and lottery locations can be limited depending on criminal offense. Discrepancies in a credit report and/or delinquent child support payments may affect acceptance into training or the timeframe for acceptance while credit situation is remediated (can result in rehabilitation funds being seized by the government.)

6. If the consumer has a sex offender status, BEP staff will make a determination regarding the impact of that sex offender status (a sex offender status does not prevent participation in training but can restrict placement in certain locations such as any location with child care or within proximity to school)
7. If BEP staff accept the referral the consumer will be scheduled to participate in an assessment.

### BEP Training Program Assessment

The assessment will be 2 weeks mandatory length. The assessment will take place at a BEP store, full time Monday – Friday. The assessment will be arranged and conducted by the BEP Specialist with assistance from the BEP manager where the assessment is taking place.

The Assessment will evaluate the consumer's:

1. Note taking ability
2. Math skills
3. Stamina/physical limitations
4. Problem solving ability
5. Customer relations/Social skills
6. Learning ability
7. Adaptive skills
8. Personal management: hygiene, dress, grooming
9. Mobility and travel skills
10. Adaptive equipment needs

At the completion of the Assessment a Training Assessment Report will be completed by BEP staff and:

It is assumed that the counselor, as part of their role, has already assessed the appropriateness of this goal for this consumer, however, if the BEP Training Assessment reveals areas of concern, these will be discussed and the counselor can determine what further evaluations are needed, such as:

1. Medical reports
2. Functional Skills
3. Psychological/ Neuropsychological Evaluation
4. Adaptive skills Test
5. Memory/language assessment
6. Wide Range Achievement Test:
7. Other appropriate/available evaluations

After all documentation and assessment results are gathered, a meeting with District Supervisor and the counselor will be held to discuss the results of the assessment. A collective decision will be made as to whether to:

1. Initiate training, or
2. Provide any required remediation prior to start of training, or
3. Recommend against the BEP as a vocational goal.

A meeting will be held with the consumer, the counselor and the BEP District Supervisor to discuss and review the assessment results, discuss strengths and issues, answer questions and advise as to acceptance into the program or the need for remediation. The consumer will then have the opportunity to accept or reject the plan.

If remedial training is recommended, a remediation plan will be developed and completed with a successful outcome prior to the start of training. Assessment of the remediated skill or behavior may be required prior to acceptance into training.

### Agreement for Training

If accepted into training each BEP candidate must sign a Training Agreement form. The Training Agreement outlines the expectations of the training program and sets standards for program participation. Each agreement will be signed by the BEP candidate and a BEP Training staff member. The candidate's signature acknowledges an understanding of the agreement's contents and a willingness to participate within the agreement's guidelines. A BEP Training staff member will provide a copy of the agreement to the BEP candidate.

After acceptance into the training program the counselor will arrange for an ATC evaluation, equipment and training to be completed prior to the start of BEP training.

### Rule

Before beginning the training program, candidates who utilize dog guides must show evidence from a veterinarian that the dog has updated vaccinations and is free from parasites.

### Scheduling BEP Training

The BEP District Supervisor will schedule the start of training and will select BEP stores to be used for on-site segments. BEP staff will meet with the consumer and outline and explain the specific training plan and have the consumer sign the Training Agreement Form (See section titled Agreement for Training above).

BEP staff will meet with the consumer to set up Hadley Math and Business Training and the consumer will sign Family Education Rights & Privacy (FERPA) waiver.

Throughout Hadley training BEP will be in regular contact with consumer as classes progress and will share progress with the counselor. If there is a lack of progress BEP staff will contact the counselor and a meeting will be scheduled to discuss concerns.

Upon completion of appropriate Math and Business courses BEP staff will contact counselor to discuss next steps for training (any additional remediation or continue to next step in training program, the BEPLT).

If continuing with Hadley Training, the counselor will authorize payment for the BEPLT program.

BEP Staff will continue to monitor the trainee throughout completion of the NABM Business Enterprise Program Licensee Training Program. Once enrolled in BEPLT the consumer has one year to complete the program. Training reports will be shared with the counselor as the consumer completes each module. The counselor should review these reports and if necessary, provide additional services needed by the consumer”.

### Onsite/Internship

Upon successful completion of the training program the consumer will complete an onsite/internship portion at a BEP business. The length of the internship is flexible with a minimum of 6 weeks. This allows the trainee to work at least one full monthly cycle or more if necessary. During the internship the candidate will be expected to be present at the facility for all normal working hours. This will include hours when the facility is normally closed to complete necessary paperwork. During the internship the student will perform all management functions of the store (under the oversight of the BEP Staff). Regular reports of activities performed are created by the BEP Staff and the student. Monthly reports will be submitted to the counselor. The counselor should review these reports and if necessary, provide additional services needed by the consumer”.

BEP Staff will determine the schedule and location for onsite training and internship.

### Fees to Training Managers

Training Managers will be used to actively train candidates at the direction of the BEP trainer.

Manager training fees will be \$40 per day for facility use when the BEP specialist is present and \$80.00 per day when the BEP specialist is not present. These fees will be

paid by the counselor monthly based on the report received from the BEP trainer. The BEP trainer will track days to be paid to manager trainers.

### ServSafe Training

Student must successfully complete ServSafe training and certification and must successfully pass the certification examination.

### Throughout the BEP Training

If issues develop during training the counselor and the BEP Trainer together will determine the recommended course of action. The Senior VRC and the BEP District Supervisor must be consulted before any plan is put into action.

If issues develop that result in the need to terminate a trainee, the District Manager, Senior VRC, BEP Director, and the BEP District Supervisor must be consulted before the plan is put into action.

### Recommendation for Licensure

Upon successful completion of the Training Program and internship, the candidate will be recommended for licensure. A BEP Training staff member will submit the recommendation to the BEP Supervisor. When approved by the BEP Supervisor the license will be prepared and issued to the candidate with copies to the:

1. District supervisor
2. Candidate's personnel file (BEP)
3. Candidate's case file (Vocational Rehabilitation)

Once a candidate is licensed, he/she is subject to all of the rules and regulations of the Business Enterprise Program.

### Licensure Meeting

The candidate will be scheduled for the Licensure Meeting at the end of the Training Program. A member of the BEP staff will conduct this meeting at a site acceptable to all participants. The Licensure Meeting will provide each candidate with an understanding of the policies, the procedures and the regulations of the Business Enterprise Program. During the meeting, special emphasis will be placed upon the responsibilities, expectations and relationships that are part of the Program.

At the conclusion of the Licensure Meeting, the newly licensed manager will be informed about the potential for employment as either a facility manager or an employee of a facility manager.

### Note

Candidates qualify for membership in the Business Enterprise Program when they become licensed. Most benefits begin with actual placement as a licensed manager or as an employee of a licensed manager.

### Placement Assistance

The VRC can authorize the following services for first-time placement of a manager in a retail and/or first-time placement in a foodservice facility:

1. A maximum of 20 hours of On-Site instruction to provide the support needed during the first days of managing a facility independently
2. License fees (i.e., resale certificate, cigarette license, fingerprinting)
3. Permits (cigarette, health, DBA, etc.)
4. Telephone installation
5. Deposits (newspaper, telephone, etc.)
6. Unemployment insurance (first premium or first installment, whichever is less)
7. Disability insurance (first premium or first installment whichever is less)
8. Worker's compensation (first premium or first installment whichever is less)
9. Change fund (\$450 per site, additional \$300 if also a lottery location)
10. Bank account open and first check order

### Expiration of License

The license of a manager will expire when a licensee:

1. Retires from BEP
2. Experiences a restoration of vision and is no longer considered legally blind
3. Fails to return at the end of an approved leave of absence
4. Fails to accept a position as manager or secure permanent employment (at least 20 hours per week) in a BEP facility within six month of receiving license.

### VR Case Closure

The counselor is responsible for determining when to close the consumer's case. The counselor should notify the BSS/FSMS when the consumer's case has been closed. See Chapter 2.00 - VR Process (Status 26) for information on closure.

## Upward Mobility Training

The Randolph-Sheppard Law mandates that each State Licensing Agency provide for upward mobility training "for all licensed vending facility managers." Therefore, licensed retail managers should have access to additional training as needed to manage other types of BEP businesses, e.g. deli, café, express stop or vending routes as they become available. The nature and extent of these upward mobility services will mean that each manager interested in these services will need to have his/her case reopened and training needs will be addressed on an individual basis.

## Referral Process

A retail manager who is in good standing in the Business Enterprise Program (as determined by the BEP staff) and has a current ServSafe certificate can be referred to the Foodservice Management/Deli Training Program. In most cases, the retail manager will discuss his/her interest in the program with their BSS/FSMS. The BSS/FSMS will consult with the BEP District Supervisor to determine if the candidate is ready to enter the Foodservice Management/Deli Training Program. If the District Supervisor agrees that the manager is ready to participate in the program, the BSS/FSMS will confer with the counselor so that the managers case can be reopened.

## Counselor Responsibilities

The counselor assigned to a manager participating in the upward mobility training program is responsible for:

1. Case reopening
2. Voucher preparation for training (lodging, transportation, etc.)
3. Service coordination

## BEP Candidate Responsibilities

Each BEP retail manager is responsible for obtaining coverage for his/her retail facility during the absence caused by participation in upward mobility training. The BEP retail manager maintains responsibility for the effective management of his/her retail business.

NYSCB will reimburse the BEP manager for the cost of his/her replacement needed during the training program. The cost of the manager's replacement, which will be approved by the BSS/FSMS, must be within accepted industry standards. The BSS/FSMS will supply a schedule to the counselor.

### Completion of Upward Mobility Training Program

Upon completion of the Upward Mobility Training Program, the manager will return to the retail business that he/she is responsible for managing. NYSCB reimbursement for the manager's replacement ends at this time and the counselor should place the case in Status 20 and will follow the procedure for case closure.

When placed as a foodservice/deli facility manager, post-employment services can be provided if needed. If the manager successfully completes the Foodservice Training Program/deli, he/she will be eligible to bid on any facility vacancies. If the manager does not successfully complete the Foodservice Management Training Program/Deli, he/she will be eligible to bid on only retail facility vacancies.

### Vending Machine Training

Each person participating in the BEP Retail Training Program will be expected to demonstrate basic skills related to vending machines. For those individuals appointed to an automatic location, successful completion of a comprehensive, short-term training program will be mandatory. The counselor should be prepared to pay for the cost of the training as well as the expenses the BEP manager might incur to participate in the training program. This Vending Machine Training Program is considered to be part of the Upward Mobility Training Program and therefore all policies related to upward mobility training are in effect for this training program as well.

### BEP Referral to VR

If a BSS/FSMS determines that a program member is having problems which are affecting their ability to successfully manage a BEP facility and attempts to resolve the issues with the manager have not been successful or require more resources, the BSS/FSMS will discuss the situation with the BEP District Supervisor. If the District Supervisor feels that VR might be able to assist in developing a plan to address the problem(s), they will complete the "BEP Referral to VR" form and forward it to the Senior Counselor who will assign the program member to a counselor as they would any application received.

The counselor or Senior Counselor will meet with the program member, the BSS/FSMS and BEP District Supervisor within two weeks of receiving the referral. The problems outlined by the BSS/FSMS will be discussed and a plan developed.

If the consensus of the group is that the program member's problem(s) could be alleviated with additional BEP skills training, the BSS/FSMS will provide assistance in the development of a training plan. If the consensus of the group is that the program member's problem(s) could be alleviated with other VR Services, the counselor will be

responsible for developing a service plan. The counselor is responsible for all case management services.

### Program Member Responsibility

The program member should expect to participate in training services during normal working hours. The program member is responsible for providing coverage for the BEP Facility during the time s/he is participating in the planned services. During the training program, the BEP program member will meet regularly with his/her BSS/FSMS and counselor to discuss progress towards achieving the training goals.

### Post-Employment Services

Provisions of the Randolph Sheppard Act provide that any licensed program member whose case is closed may be eligible for post-employment services to achieve his/her maximum vocational potential and maintain suitable employment within the State Retail Facility Program. See Chapter 11.00 - Post-Employment Services (PES) for further information.

## **NYSCB Business Enterprise Program Trainee Agreement**

**I would like to obtain a position as an owner/manager of a NYSCB Business Enterprise Program (BEP) Retail Facility. I understand that I must successfully complete a two part training program before I can be licensed as a BEP Manager.**

**The first part of the training is the academic portion, completed online; the second part is an on-site training and internship completed at a BEP retail facility.**

**The academic, online portion will teach me the policies, procedures and technical skills I will need to own and operate a**

**BEP retail facility. I understand that I will need a computer with internet access and that this portion of the training is self-driven with classes to be completed within the timeframes shown on the attached list of courses.**

**I understand that the on-site training requires a minimum of six weeks and during that time; I will work with a BEP Staff member and the BEP retail facility Manager to apply the skills I learned online.**

**Overall areas of instruction covered within both trainings include:**

- **Randolph Sheppard Introduction**
- **Vending Management**
- **Café Operations**
- **Systems**
- **Sales**
- **Employee Hiring and Development**
- **Labor and Cost-of-Good's Management**
- **Customer Service**
- **Business Processes**
- **The Relationship between NYSCB and BEP**
- **Workplace Safety**
- **Purchasing/Receiving/Storage**

- **Inventory Control**
- **Merchandising**
- **Business Management/Financial Management**
- **Tobacco Regulations**
- **ServSafe Certification**
- **Lottery Training**

**Since the requirements for participation in the BEP Training Program are the same as the requirements for the management of a BEP retail facility, I will attend the training program on a full time basis and I will arrive on time each day.**

**Absences and/or lateness are reasons for termination of my participation in the training program. Personal appointments are to be scheduled after business hours and requests for excused time off are to be made in writing two weeks prior to the date of the requested time off; written approval must be obtained.**

**I understand that I must wear casual business attire appropriate for a retail sales business and sneakers, shorts, T-shirts and sweat pants are not appropriate attire.**

**I understand that my performance (grades, attendance, punctuality, motivation, and skill development) will be monitored and discussed with me on a regular basis. I also understand that my participation in the training program is**

**voluntary and that I can terminate it at any time if I choose or it can be terminated by NYSCB if my performance is unsatisfactory as listed in the school code of conduct attached.**

**By signing this agreement, I acknowledge that I understand my responsibilities as a participant in the BEP Training Program. I understand that I can meet with my Vocational Rehabilitation Counselor and a BEP training staff member at any time during this training program to discuss any problems or issues that concern me.**

**Trainee Name:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**City:** \_\_\_\_\_ **State:** \_\_\_\_ **Zip Code:** \_\_\_\_\_

**Phone:** \_\_\_\_\_ **Cell Phone:** \_\_\_\_\_

\_\_\_\_\_  
**BEP Trainee signature**

\_\_\_\_\_  
**BEP District Supervisor signature**

## **Student Code of Conduct**

**Faculty and staff will work with you, as a student of The Hadley School for the Blind, in the pursuit of your educational goals by providing an environment characterized by respect, academic integrity, and fairness.**

**The Hadley School for the Blind's Student Code of Conduct builds on the policies and guidelines set forth in the Student Handbook. As a student of the school, your responsibilities include:**

- 1. Conducting yourself with professionalism, courtesy, and respect for others in your dealings with the Hadley School faculty, staff, and other students.**
- 2. Presenting your qualifications and background truthfully and accurately for admission to the Hadley School.**
- 3. Observing the school's policies and rules on submitting assignments and participating in faculty online office hours, Seminars@Hadley, and other online discussions.**
- 4. Turning in work that is your own; not presenting another person's ideas or scholarship as your own.**
- 5. Not asking for, receiving, or giving unauthorized help on graded assignments.**
- 6. Never divulging the content of, or answers to assignments to fellow students.**
- 7. When taking an online course, maintaining the security of your password by not sharing it with fellow students or others.**

- 8. Observing the recommended assignment submission schedule for your course.**
- 9. Never soliciting money from Hadley School faculty, staff, or students.**
- 10. Reporting any violations of this Hadley Student Code of Conduct and reporting any evidence of cheating, plagiarism, or improper conduct on the part of any student of the Hadley School when you have direct knowledge of these activities.**

**By following this code, all students, faculty, and staff can participate in a positive learning environment. Students are advised that violations of this Student Code of Conduct or other policies as set forth in the Student Handbook may result in disciplinary action, including suspension from studies or expulsion from The Hadley School for the Blind.**

### **Grading Policy**

- The student may submit an assignment a total of two times (the original and one resubmission) at which point the instructor intervenes to allow a third attempt.**
- The student will be dropped from the course if he/she does not pass an assignment with a score of 75% after three attempts.**
- The student needs to earn a final grade of 75% or better to proceed to the next module.**

- **A student must also earn a grade of 75% on the cumulative final exam in order to score a passing grade.**

**Note: Failure to score a minimum of 75 percent on all modules and the cumulative final exam will result in program termination.**