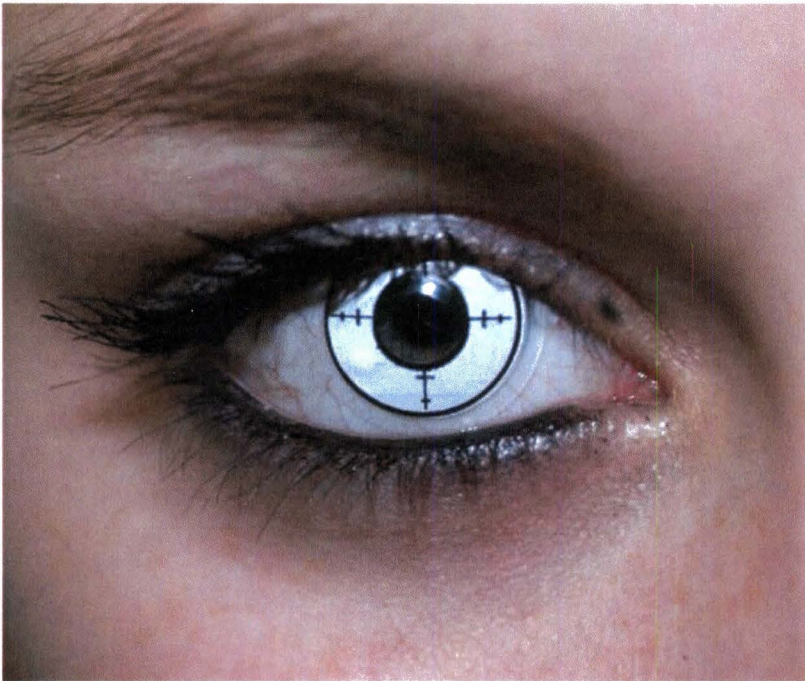


EYE SEE UNIFORMITY

SOUTH CAROLINA COMMISSION FOR THE BLIND



HOW THE SC
COMMISSION
FOR THE
BLIND
BUSINESS
ENTERPRISE
PROGRAM
(BEP DEPT.)
CAN
IMPROVE
SERVICES TO
THE BLIND
LICENSED
VENDORS,
AND STAFF
IN THE STATE
OF SOUTH
CAROLINA

Charles D. Rabon Trade Specialist V SCCB

Date Feb 13, 2017

SC Commission For the Blind
1430 Confederate Ave.
Columbia SC 29201

Table of contents:

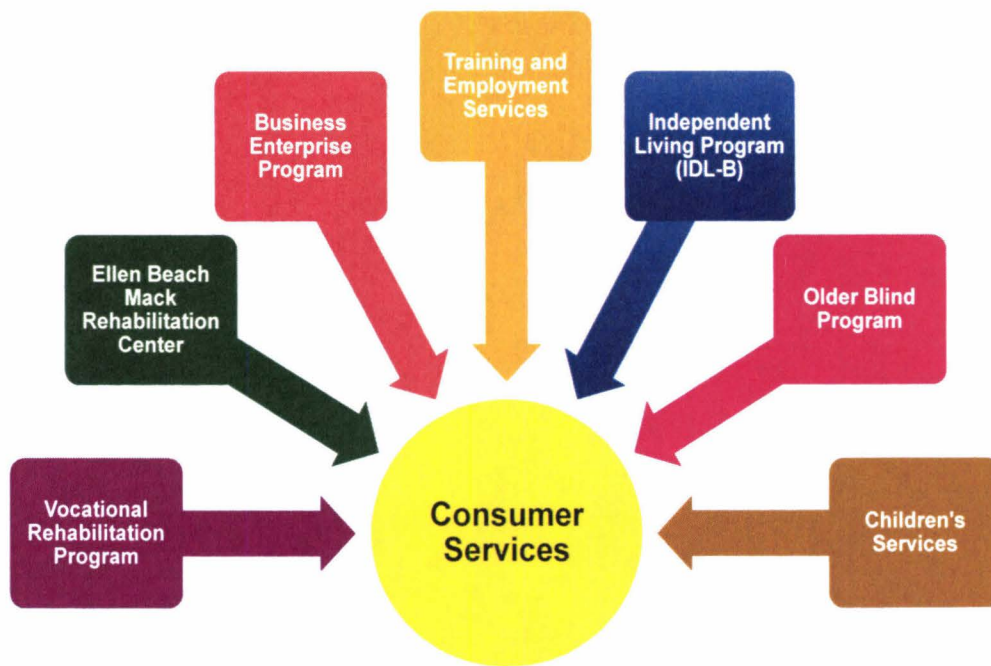
Introduction

Overview of the SCCB Program & Services.....	3
Mission Statement.....	4
Eligibility Criteria / SCCB Core Programs and Services.....	5
Business Enterprise Program / Training and Employment Services.....	5
Problem Statement.....	6 & 7
Data Collection.....	8
Data Analysis.....	9-10-11
The "COST" of doing business.....	12
Implementation.....	13-14-15
Evaluation Method.....	16-17
Summary and Recommendations.....	18-19

Appendices:

MEI Recycler description / SVS / (Repair Pricing Addendum for 2017).....	20-21
(ADA)American Disabilities Act / (FDA) Federal Drug Administration	22-30

OVERVIEW OF SCCB PROGRAM AND SERVICES



SCCB MISSION

The mission of the SC Commission for the Blind is to provide quality vocational rehabilitation services, independent living services and prevention of blindness services to blind and visually impaired individuals leading to competitive employment and social and economic independence



Eligibility Criteria

SCCB provides services to the legally blind and severely visually impaired South Carolinians. These services are made available with state & federal funding. There is no charge to the consumers for Services.

SCCB Core Programs and Services

Business Enterprise Program (BEP):

Provides job training, stand development, consulting services job placement, and stand maintenance to carry out the mandates of the Randolph-Sheppard Act.

Training and Employment Services:

Provides training to consumers on assistive technology, job readiness skills, and customer service skills that are needed to become competitively employed.

Problem Statement:

The South Carolina Commission for the Blind needs to provide the Blind Licensed Vendors, their sighted helpers, and SCCB staff counselors with a streamlined working environment. At present we have twelve company brands, and thirty different types of vending equipment. This is extremely challenging for the BLV's, helpers, and counseling staff of the Commission to remember how to operate this wide array of complicated vending equipment that's mix-matched in the Business Enterprise Program (BEP Dept.) statewide.

The same problem also falls on the SCCB technical department repair staff that installs and performs maintenance on all vending equipment as needed. My staff and I maintain hundreds of vending machines in the State of South Carolina for the Blind Licensed Vendors, their helpers, and the Commission staff providing in house, and on-site training. Each company's brand of vending equipment varies greatly when it comes to set-up, installation, and training for proper operation on location. (price setting, test vending, refrigeration requirements, preventive maintenance, repair parts, etc.) The SCCB warehouse has thousands of repair parts (New & Old-reusable parts), plus equips our repair trucks with hundreds of mentioned parts for on-

site repairs. With such a wide variety of vending equipment, thirty types & growing, this is truly a "Problem Statement" that needs to be addressed at the SC Commission for the Blind.

The current impact on the Blind clients has become overwhelming for long time stand managers with thirty plus years of service. Trying to remember how to operate and maintain these vending machines is a nightmare. Currently we have street route stands in SC that have (4 to 6) different kind of snack machines
(3 to 4) different kind of refrigerated / frozen food machines
(3 to 4) cold beverage & Coffee machines
(3 to 4) different types of Dollar bill changers.

These same issues facing the BLV's is true for the SC Commission for the Blind staff across the board. My project will identify new departmental goals that if applied should better serve SCCB staff, blind clients, and their helpers leading them to a more competitive employment environment, being more personally independent, social, and having economic independence for years to come.

The goals stated are a critical part of the South Carolina Commission for the Blind

"Mission Statement."

Data Collection:

The goal for my data collection is to bring fresh ideas to the SC Commission for the Blind (BEP Dept.) about streamlining the vending equipment statewide. This data will reduce the amount of training we currently have to provide in an on-going basis to BLV's, helpers, BEP Counselors, and Trade Specialist. (Vending Technicians)

This data will provide a total cost saving, to Business Enterprise Program's allocated budget that will save tax payers thousands of dollars yearly. This should in the long run be a "Win-Win" for the Commissions BEP Dept., SC tax payers & the blind clients we currently serve and those we will serve in the future.

I've collected information by attending the Atlantic Coast Exposition in Myrtle Beach SC. This is a yearly three day event in October that caters to the vending industry up and down the East Coast. I received information and training on some of the newest vending machines on the market for 2016 - 2017 year that were ready for purchase at the trade show expo. This is just in time for the South Commission for the Blind's equipment contract renewal that's coming up for bid in early summer.

Methods of meeting food service & vending machine company reps at such a

large expo gives you the chance to put "Hands On" the equipment, and talk to the representatives while taking a close look at the equipment for quality issues or concerns right next to their competition. Compare Apples to Apples !

Data Analysis:

During my 32 years of working in the vending industry I have gained vast knowledge regarding the different types of vending & food service equipment that are on the market, and have worked on most types going back to mechanical (no electronics). I have findings that will show cost savings for the agency by reducing the amount of service calls on such a wide array of complicated vending equipment that's become very dated over the past 22 years that I've been working for the SC Commission for the Blind. We still have machines in stands operated by the South Carolina Commission for the Blind that are over twenty five years old, and aren't ADA compliant. (American Disabilities Act.) The ADA requirements are on appendices page. 23-26

Data collected also identifies new Federal regulations on calorie disclosure by the FDA for vending operators with stands having over 20 vending machines. Some of our BLV's have street routes that will be found Not in Compliance and could incur fines in

the future. All of these issues can be resolved by purchasing machines with built in LCD displays screens. If the existing machine is new enough, an e-Port digital display card reader can provide product calorie info at a minimal cost instead of vending machine replacement. (Cost savings are in the thousands verses a new machine purchase.)

FDA (Federal Drug Administration) requirements are on appendices page. 27-30

I have researched the cost of replacement parts needed on new machines such as control boards, interface boards, vend motors, etc. These items will interchange on the new vending machines. One control board fits most of the machines in the company line up. On the snack, sandwich & frozen food vending machines, control boards are the same, and some of the vending machine motors will interchange from company to company.

This is a solution to a lot of costly inventory stocked parts that are needed at the SCCB warehouse, and on the service trucks going to repair calls statewide. The Commission spends thousands of dollars each year on so many different types of parts that don't interchange from machine to machine. The cost of so many various parts to keep old machines working is sky-rocketing. All of the parts are aftermarket type because the companies are no longer in business. New machines will save money in the long run.

Some vending machines operated by the SCCB are over 25 years old! No Parts are available period. My staff & I are working tirelessly trying to keep machines working for the BEP Dept., but with parts no longer available (obsolete), all we can do is put on old parts removed from machines that have been declared "JUNKED" by State Surplus Property. We spent hours stripping machines for re-useable parts that last only a weeks or months. Sooner than later we return on a repair call replacing those 20 year old parts with "You Gussed It" more used and worn parts.

Crane Merchandising Systems Rep. David Melvin stated at the trade show in Myrtle Beach SC, for each repair call the estimated cost is \$150.00. The SCCB has 4 vending techs, and most days 3 techs are responding to service repair calls. That's \$450.00 per day & \$2,250.00 per five day work week. We rotate being "on-call" one vending technician covers the whole state of SC for holidays and weekend service calls for the SCDC Prison System. These mandated service calls definitely increase our total cost.

The SC Commission for the Blind cost savings would be tremendous by cutting service calls in half on old obsolete vending machines. Pay now, save later. The BEP Dept. could potentially buy a new vending machine every two weeks by just reducing the amount of repairs. Current prices of major parts, & new vending machines will be

listed in detail on the following page. Plus see appendices page 21 for service center repair charges on bill acceptors, control boards, etc.

The "Cost" of doing business:

<p>"AMS Brand" vending machines Model 39 ambient snack \$3,350.00 Model 39 chilled snack \$3,745.00 Model 35 ambient snack \$3,250.00 Jr. size Model 35 chilled snack \$3,575.00 Jr. size Model 39 Outsider chilled snack \$4,804.00 Model 39 "Visi-Diner" cold food \$4,056.00 Model 35 Bottle/food combo \$4,206.00 <u>Jr. size</u> Model 39 Bottle/food combo \$4,375.00 "AMS" <u>control board</u> \$312.00 <u>Fits all above</u></p>	<p>Warranty info. 3 years</p>	<p>A&M Equipment Sales Lithonia GA.</p>
<p>Crane Merchandising Systems, Inc. Model 472 Media chilled snack \$5,741.00 Model 471 Media ambient snack \$4,932.00 Model 962 Revolution "Drum Style" Cold Food machine.....\$9,449.00 "Crane" <u>control board</u> \$258.00 <u>Fits all above</u></p>	<p>Warranty info. 2 years</p>	<p>Brady/Starburst Charlotte NC. <u>State contract now</u> will bid again on 2017 contract</p>
<p>"USI Brand" vending machines Model alpine St5000 or Vt5000 <u>Chilled snack "Outsider" machine \$7,222.00</u> <u>Combi 3000 frozen food machine \$7,222.00</u></p>	<p>Southeastern Vending Services, Inc. Charlotte NC.</p>	
<p>Combi 3000 frozen/refrigerated Cold Food machine \$7,222.00 Jr. sized</p>	<p>Warranty info. 2 years</p>	<p><u>State contract now</u> will bid again on 2017 contract</p>
<p>"USI" <u>control board</u> \$210.00 <u>Fits all above</u></p>		

"American Changer" Model AC1000 Dollar bill changer \$1,845.00

"MEI Bill Recycler"- any machine (Replaces need for a bill changer) \$635.00 page. 20

"USI" Geneva coffee machine \$6,200.00

All of the companies listed on the previous page will set-up their equipment per the Commission for the Blinds requirements and Blind client's needs. These Companies will deliver to the locations statewide (BLV's Stands) or warehouse, train BLV's, helpers, and all agency staff on the proper operation & maintenance of the vending machines.

As Blind clients grow their business or move to another stand in South Carolina, the learning curve for them and the SCCB staff will be a smooth transition. This new data gathered will ensure a major cost saving on training, travel time, service repair calls, and parts inventory costs will be greatly reduced by streamlining machine types and company brands of vending equipment.

Implementation Plan:

Sharing relevant information ensures that all parties involved (SCCB senior staff, BEP dept., blind clients) have a common base of information on which to make informed choices to change and improve the process that we as an agency are now doing.

I want to ensure that all parties mentioned above understand that the purpose of this project is to make improvements, “Not Find Faults” or “Cast Blame.” How do we get to where we need to be and not stay in the same place “Implement Change.”

Action must be taken to complete this goal. This is an opportunity for the South Carolina Commission for the Blind to get the right people on-board. The SCCB leadership can make decisions today by setting a strategic plan in place for the future growth of the Business Enterprise Program, and share this information with key stakeholders to make this vision a reality. Start small (Don't try to always hit a home run), a single is fine. Three singles hits can set the team up for a BIG SCORE!

The timeframes & costs for implementation of this plan will not come overnight, but we must provide current technology for the ever changing vending market. In the last two years we have replaced over a hundred vending machines statewide to the newest styles available. New machines should remain in the locations, and meet the current needs for 7 to 10 years, unless vandalism occurs causing the removal if not repairable.

We need to continue providing high quality equipment that's updatable on-site for SCCB Technical Staff, or for future government regulations. The new vending machines listed on the “Cost” page.12 meet these requirements, of high quality, and adaptability.

With a new procurement contract coming in 2017, communication between all parties will be crucial in using potential resources to purchase specific equipment to meet the blind vendor's needs to streamline vending machines, and integration into a standard operating procedure for the future procurements. The cheapest isn't always the best. Past experience with poor quality vending equipment on the state contract has been a problem that's been documented by the SCCB "BEP" department technical repair team, counselors, and the "BEP" director.

The North Carolina Commission for the Blind also purchased some of the same poor quality vending equipment, and has since had to replace all of them in the Blind Licensed Vendors stands. They contract out all of their vending machine repair maintenance to a private contractor that was not able to keep the machines working properly. So for, with a lot of defective parts replaced, The South Carolina Commission for the Blinds vending tech's still have these machines working in the locations, but they are poorly made, and will not hold up in some of our high volume or abusive stands. (Interstate Rest Areas, Federal & State Prison Systems).

Evaluation Method:

This will be an ongoing process evaluated by the Business Enterprise Programs staff across the board. This also will be evaluated and reviewed with the BLV's, their helpers, and customers in locations that the SCCB provides services to etc., ensuring their needs and concerns are monitored for improvement. We as an agency must identify with a new plan for achieving reasonable, and measured results through documentation to SCCB "BEP" dept. director, and to the Commissions leadership staff proving a cost savings to the South Carolina Commission for the Blinds allocated yearly budget. For this plan to work it will take dedication, leadership direction, and a staff committed to leading while being mindful of the purpose and values our agency is known for, to the blind clients we serve, and the tax paying citizens in the State of South Carolina.

The data information I collected about streamlining vending machines at the SCCB will produce cost savings by reducing travel statewide for repeated training classes to the blind vendors, their helpers and staff counselors. Currently the BEP department training coordinator/instructor provides a week long class at the SCCB in Columbia SC for potential blind stand managers on vending machine operation. The trainer also provides on-site instruction to stand managers, and their helpers statewide when the

BLV moves to a new stand with various types of vending machines that they haven't had training on yet. (Usually 8 to 10 times per year.)

The SCDC prison system requires our agency to provide training for blind vendors, and their helpers that manage the "cashless" vending equipment in our prison stands four times per year. This training is held at the SCCB in Columbia SC, and statewide in the prison locations as needed. The BEP Technicians provide this on-site training 8 to 10 times per year. The required training sessions for the SCDC prison system mentioned above could potentially be cut in half if the SCCB would streamline the cashless vending equipment in SCDC prison system.

Reduction in on-site training statewide also could be cut in half if a blind stand manager moves from one stand to another in South Carolina. Only provide additional training as needed to blind managers, helpers, and SCCB staff. The amount of service calls and parts needed in the warehouse inventory would also be greatly reduced.

The newest vending machines bought over the past couple of years have had very few mechanical issues, and are still under factory warranty. New machines fitted with the MEI Bill Recycler eliminates the need for an expensive dollar bill changer. Evaluate the need before spending funds. The Recycler cost less than \$650.00, compared to

\$1,845.00 dollars for a dollar bill changer. See the Recycler appendices page 20.

I have also evaluated the cost saving to the BEP program if we would only buy junior sized snack machines instead of "Full Sized" type. Reduction in the amount of products for sale in a "Junior Sized" snack machine is very minimal, but the price saving is hundreds of dollars less verses buying a "Full Sized" machine. Ninety percent of the locations the SCCB provides vending machines to only need a junior sized snack.

The interstate rest areas, Federal & State Prisons, and a few building or complexes with a large workforce will still need full sized snack machines. These locations usually have three to five snack machines in place to cover the large volume of customers. In the future buying the junior sized snack and cold food machines would save the SC Blind Commission thousands of dollars each year! See page.12 (highlighted items.)

Summary and Recommendations:

The implementation of this idea I'm proposing will bring a much needed, and long overdue change to the way our small agency does business in South Carolina. I'm not saying that this potential change will solve all of the agency's machine problems in a new ground breaking way, but using any of the data collected is a step in the

right direction for the SC Blind Commission. Applying this change will benefit current blind licensed vendors, and clients we serve in the future. This is recognizing a need for change, and trying a new platform for creating solutions towards the desired goal.

With any agency coming up with something new, or making something old better can be hard, but we need to “reframe challenges as opportunities”. It could be a game changer for all involved. Streamlining the equipment statewide will simplify the operation for the blind clients, their helpers, and all SCCB staff.

We should start seeing immediate repair cost savings, a reduction in part inventory cost, plus a huge travel & training cost savings that's required by the SCCB counselors, and the Technical Repair Staff. With such a mixed matched allotment of vending equipment all over the state “Streamlining It” is the way to go for a cost savings that the “Eye can See” at the South Carolina Commission for the Blind.

Integrating these findings into a standard operating procedure for the new procurement contract in 2017 is my recommendation to the SCCB “BEP” department. This will be painting a bright future for blind clients we have yet had the opportunity to serve.

“Their future can be so bright, they will have to wear shades”!

MEI VNR Recycler



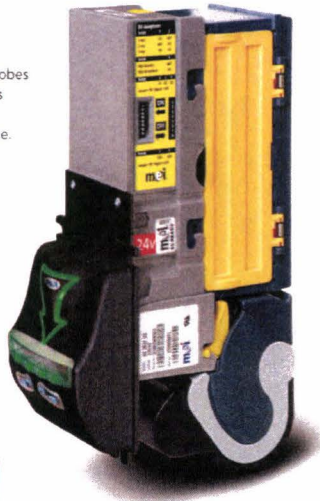
CRANE PAYMENT INNOVATIONS



Changing the point of sale



High-Visibility Bezel option strobes through a wide range of colors and enables and disables its denomination lights in real-time.



MEI VNR Recycler



Perhaps no other vending technology available — past or present — provides the tangible, immediate, return on investment that note recycling does. First introduced in 2007, this transformative solution mimics the brick and mortar retail experience for an unattended retail location by paying back bills as change to consumers.

And it's the MEI VNR Recycler that changes the unattended point of sale with note recycling.

Built off the MEI VN Series platform, an ancillary module was later designed to enable recycling capability in VN2700 validators already operating in the field. Easily affixed to the rear of VN2700 devices, recycling functionality can be deployed at any time, offering operators greater flexibility to decide where and when to implement.

With the ability to store up to 30 notes (USD \$1 or \$5s*), this self replenishing technology takes bills coming in for payment, stores them on an internal drum inside the device, and returns them as change to consumers as needed. Achieve higher sales lifts by accepting higher note denominations, without reservation around ample coin changer funds.

Additionally, note recycling eliminates the need for expensive bill changers found in vending banks and minimize the need for \$1 coins. The MEI VNR Recycler manages larger notes for you by enabling acceptance of higher denomination notes, particularly ATM \$20 notes, and the payback of notes as change. Operators have found more \$20s in their cashboxes and up to a 35% sales lift through recycling alone.

There are no communication fees with note recycling, no loss of online machine connectivity. Recycling simply changes the point of sale for the better.

*Denominations vary by country



**2017
Repair Pricing Addendum
For
South Carolina Commission for the Blind
January 31, 2017**

<u>Item</u>	<u>Labor Plus Parts Pricing</u>
CBA-2 Bill Acceptor	\$65.00
Rowe Circuit Boards	\$85.00
National Control Boards	\$110.00
AP Control Boards	\$85.00
AP Display Boards	\$58.00
Dixie Narco Boards	\$85.00
USI Control Boards	\$85.00
USI Display Boards	\$58.00

Please Direct All Questions To:
Mike Frye
(704) 578-1620
mfrye@vendingsvs.com

Repair Pricing Labor Plus Parts

MEI & Conlux

- 3-Tube Mech's \$40.00
- 4-Tube Mech's \$46.00
- 5-Tube Mech's \$46.00
- VN Bill Acceptors \$48.00
- Conlux BA's \$48.00

Coinco

- Coin Mech's \$38.00
- Bill Acceptors \$55.00

Boards

- Rate Based on Model

Warranty

- 202 Days



[Home](#) [New Vending Machines](#) [Used Vending Machines](#) [Information](#) [Contact](#)

New ADA Rules on Vendors and Equipment

Posted on June 18, 2012 by Piranha Vending

Vending operators now must comply with changes to the regulations mandated by the Americans with Disabilities Act. Here are some of the key changes:

*require a forward and side reach range of 48" maximum and 15" minimum.

*product must be delivered at a minimum height of 15" to all users.

The new ADA standards apply to vending equipment that are considered "fixed equipment". "Fixed equipment" is defined as being built into the structure of the building, attached to the wall or floor – not freestanding.

Freestanding vending machines do not require these rules, but it still must be accessible to persons with disabilities. That includes providing an accessible route and clear floor space at installation.

This entry was posted in [Vending Machines](#), [Vending News](#) and tagged [ADA rules](#), [americans with disabilities act](#), [changes](#), [freestanding vending machines](#), [piranha vending](#), [product](#), [regulations](#), [standards](#), [vending equipment](#), [vending operators](#), [vendors](#). Bookmark the [permalink](#).

[Home](#) | [Combo](#) | [Used Machines](#) | [Information](#) | [Contact Us](#)

Copyright © 2012 Piranha, LLC - (800) 766-8265 - 3003 Central Industrial Dr., Shelby Pwp., MI 48315, USA

Web Development by [mSeven](#)



It's About Flexibility & Choice
crantems.com

Select Language [v] Powered by [v] Translate

Vending | Coffee | Foodservice | Music & Games | Bulk Vending | Upfront | Edit: Vending | Edit: Music & Games & Bulk | Meetings | Hardware & Tools | Guest Columns

Vending Times

Home | Archives | Subscribe | Industry Statistics | Contact Us | About Vending Times | Media Kits | e-Newsletter Signup | Buyers Guide Update Form | News Releases

QUICK LINKS: Videos | Micromarkets | Redemption Report | Classifieds | Buy a Classified Ad | Editorial Calendars | Circulation Data | Downloads | Bookstore | Date Book

Search [input] [GO]

Connect With Us! [f] [in] [t] Tuesday, March 21, 2017

Bookmark this site

Issue Date: Vol. 52, No. 4, April 2012, Posted On: 3/23/2012

Dept. Of Justice Official Clarifies Effect Of New ADA Rules On Vending Firms And Equipment

Emily Jed
Emily@vendingtimes.net

vending, vending machine, vending operator, vending ADA compliance, Department Of Justice, Barbara Elkin, Americans with Disabilities Act, vending machine ADA rules, new ADA rules, ADA standards, National Automatic Merchandising Association, vending machine manufacturer, vending machine design, vending machine clearance, vending machine reach, vending machine ADA specifications

CHICAGO -- Vending operators now must comply with changes to the regulations mandated by the Americans with Disabilities Act, but many are not sure what this compliance requires. The new rules went into effect on March 15, and the [National Automatic Merchandising Association](#) organized a webinar with a U.S. Department of Justice expert to help clarify what the rules mean to the industry.

Barbara Elkin, a legal advisor for the DOJ, explained that many of the standards in the new 2010 rules, applicable to vending machines, are unchanged from the original regulations drafted under the Americans with Disabilities Act of 1990. There are some consequential changes in the final revisions to the regulations published by the DOJ on Sept. 15, 2010, which took effect on March 15, 2011, with compliance required 12 months thereafter.

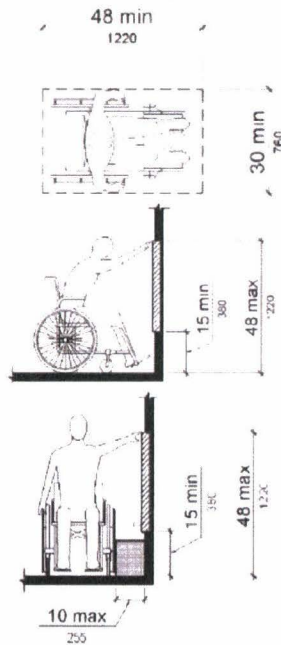
Putting industry members into the big picture, Elkin explained that the 1990 ADA extends civil rights protections to persons with disabilities similar to those provided based on race, color, sex, national origin and religion. The rules provide for equal opportunity for persons with disabilities in public accommodations, employment, transportation, state and local government services and telecommunications.

The entities that must comply with the rules, defined as "Title II," include state and local government programs as well as services provided by publicly funded schools, colleges and hospitals and government agencies. But compliance also is required of private, "Title III" entities, defined as those that own, lease or operate facilities that serve the public. Examples of such public accommodations include restaurants, retail stores, hotels, movie theaters, private schools, convention centers and recreation facilities.

Elkin pointed out that vending machine manufacturers are not directly covered by the ADA, because they are not state or local government services or public accommodations. "If the machine is not compliant, the manufacturer is not liable," she stated. However, ADA-covered facilities that offer vending machine services must ensure that those services are accessible to persons with disabilities. Thus, vending operators serving these sites are likely to be required by clients to ensure their services are accessible, when the client is required to comply with the rules.

In some circumstances, compliance by Title II entities will require structural changes to existing facilities. This would include modifications that make the vending machine services accessible, as accessibility is defined by the rules.

Clear Floor Space



S&B
Candy & Toy
1-800-773-0531
CANDY TOYS
PLUSH BALLS
CAPSULES BOUNCE BALLS
KNOBBY BALLS
TICKETS
1-800-773-0531

"Program access obligation runs to the Title II entity, not the vending machine manufacturer," Elkin repeated.

For Title III entities, the ADA requires that public accommodations remove architectural barriers in existing facilities when such modification is "readily achievable," which is defined as "easily 'accomplishable' without much difficulty or expense."

Modification to a facility is considered not "readily achievable" if it requires extensive restructuring, or substantial expense. Such a determination is made on a case-by-case basis.

Elkin emphasized that barrier removal obligation is the responsibility of the public accommodation -- again, not the vending machine manufacturer.

NEW REACH REQUIREMENTS

Among the biggest changes to the rules that can affect vending are the reach requirements. The 1991 ADA rules require a forward reach range of 48" maximum and 15" minimum. When the customer approaches the machine from the side, those rules specify a 54" maximum and 9" minimum reach range.

The 1991 ADA standards also require that the path in front of the machine have enough room for a wheelchair to approach the machine and turn around, with a minimum of 30" in front of the patron and 48" clearance back from the machine. Additionally, the ground space around the machine must be "stable, firm and slip-resistant."

The 2010 standards maintain most of these specifications, but revise the side reach range -- in a situation where clear floor or ground space allows a parallel approach to an "element" -- to 48" maximum high reach and 15" minimum low reach.

The machine's operable parts must be placed within one or more of the reach ranges. An "operable part" is defined as a component of an element that's used to insert or withdraw objects, or to activate, deactivate or adjust the element. Examples include buttons, buckets, switches, handles and doors.

Elkin explained that, when the element is a vending machine, product must be delivered at a minimum height of 15" to all users, and that the entire button or switch array must be within the reach range. "Within reach range means just that -- not above or below," Elkin emphasized. "The bottom of the vending bucket can drop lower and come up on a conveyor, but it must be delivered at a minimum of 15 inches."

The revised ADA rules also include "scoping" requirements, specifying that at least one of each type of "depository, vending machine, change machine, and fuel dispenser in covered locations" meet the new standards.

"If you have a bank of similar machines, at least one of each type must meet the standards," explained Elkin. "If you have three cold-drink machines in a bank, only one needs to comply. If each machine is selling different products, people with disabilities should have access to all of them."

Machines on different floors or in different places on a floor are not considered to be serving the same group of people. Therefore, at least one of each type of machine in each area must meet the ADA requirements. In a hotel, for instance, a vending bank on the first floor that's ADA compliant doesn't cover all floors, Elkin instanced, since a person with a disability shouldn't have the additional burden of coming to the lobby to use the service if the machines on his or her floor aren't compliant.

The technical requirements of the ADA standards, unchanged from 1991, require that equipment be designed so that all users, with or without disabilities, can use the same controls or receive product in the same way. It cannot require extra steps for persons with disabilities.

The rules for operable parts specify that they be operable with one hand, and that they do not require tight grasping, pinching or twisting of the wrist. The force required to activate operable parts can be no more than five pounds.

Elkin explained that the ADA standards apply to "fixed equipment," which can include vending machines. When a public entity or a public accommodation installs a new vending machine, or replaces or alters an existing one, then if that machine is "fixed equipment," it must comply with the applicable ADA accessibility standards. "Fixed" elements are covered under the rules because they're considered to be part of the built environment, since they are attached to the facility. "Fixed equipment" is defined as being built into the structure of the building, attached to the wall or floor -- not freestanding.

One way to ascertain if equipment is fixed is to put it through the "upside down" test, the speaker explained. If the building were turned upside down, any machines that would remain in place rather than fall to the ground are considered "fixed."

A vending machine is not considered to be "fixed" simply because it's plugged into the wall, Elkin continued. "And if machines in a line are bolted together, but not affixed or attached to the building structure in some manner, they are not fixed equipment," she added.

One example of fixed equipment would be a coffee machine that is plumbed into the building's water system, or attached by electrical conduit, rather than simply plugged into an electrical outlet. In such a case, entities covered under the ADA must provide new and altered machines that comply with the 2010 standards.

If a covered entity provides vending machines that are not fixed (freestanding), it must still ensure that they are accessible to persons with disabilities: an accessible route and clear floor space are still required at installation by the both the 1991 and 2010 standards.

As of March 15, vending machines in covered facilities must comply with the 2010 standards if there is a change to a building or facility that could affect its usability. Such alterations include changes due to remodeling, renovation, or changes or rearrangement of structural parts or elements.

However, under safe harbor rules, existing fixed vending machines that comply with the 1991 standards and are not altered or replaced are not required to be modified to comply with the 2010 standards. The safe harbor no longer applies if the covered entity replaces or alters the machines -- new or altered machines must comply with the current standards.

Elkin concluded by answering the much-asked question of how the ADA rules are enforced.

"Technically, there aren't fines. But the DOJ can seek penalties for noncompliance up to \$55,000 for the first violation, against the covered entity," explained the speaker. "Sometimes, it can just seek injunctive relief."

She emphasized that it is not the vending operator who is required to comply with the regulations, but noted that the accounts they serve will rely on their cooperation and assistance in providing accessible vending services, in order to meet their ADA obligations.

Resources

ADA information line (DOJ): (800) 514-0301 (v); (800) 514-0383 (TTY)

ADA website (DOJ): www.ada.gov

National Network of ADA Centers/Disability & Business Technical Assistance Centers (formerly DBTACs) (800) 949-4232 (Voice and TTY)

ADA Update At OneShow

NAMA will hold a follow-up session on the new ADA requirements during the OneShow in Las Vegas on Wednesday, April 25. It will be part of the Government Affairs Symposium, which begins at 8:30 a.m., and will be presented by Carolyn Doppelt-Gray of the Washington, DC-based law firm Proskauer Rose LLP. She counsels clients in a range of industries, including lodging, stadiums, retail, universities, restaurants and hospitals, on all aspects of disability-related employment and accessibility requirements under federal, state and local law.

RELATED RESOURCES

Topic: Vending Features

Articles:

- Supreme Court Asks Government If Vending Machines Must Comply With ADA Rules: Blind Patron Appeals Coke Suit
- Fortune: Coca-Cola Turns To Google To Lower Digital Signage Costs
- Avanti And StabbKiosks Chiefs Start The Self Service Group
- Accent Food Services Acquires Nevada's Java Pro's
- Accent Food Services Acquires Vending Of Texas; Acquisition Is Fifth In 2017

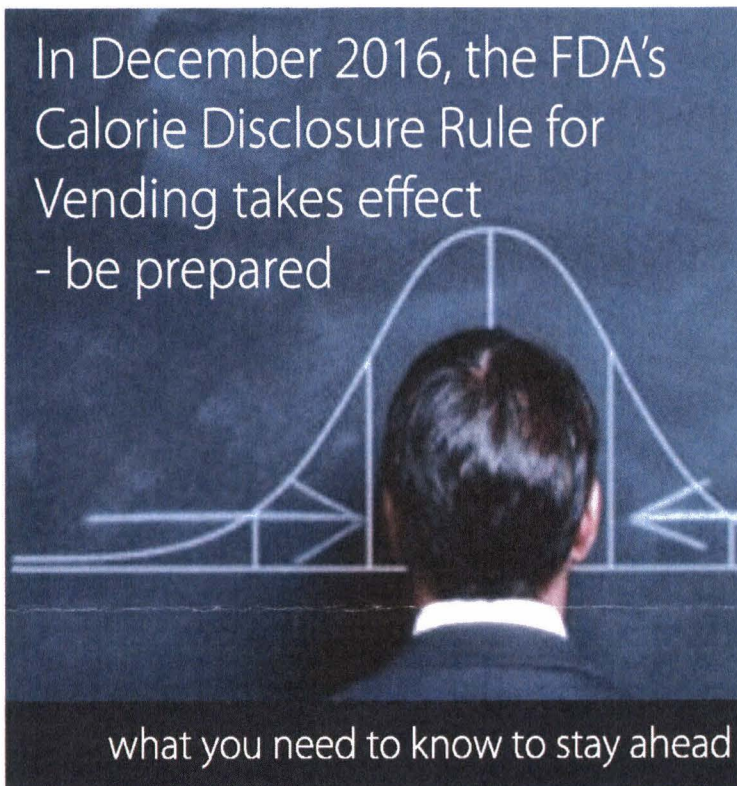
Copyright © 2017 Vending Times Inc. All rights reserved
P: (516) 442-1850 | F: (516) 442-1849 | subscriptions@vendingtimes.net
55 Maple Ave. - Ste. 304, Rockville Centre, NY 11570

With the regulations mandated by the ADA (American Disabilities Act) for vending operators in the United States, the South Carolina Commission for the Blind have been working diligently to making changes to vending equipment upgrading canteens, street routes, interstate rest area locations, SCDC prisons, and federal Prisons to stay in compliance for the needs of disable consumers to insure services are accessible, when the blind clients providing vending services in these locations or required to comply with the rules.

The BEP department in the past few years have been informed of equipment that needs to be upgraded for compliance standards to be met, and in those cases the ADA issues were addressed promptly. All new equipment purchases for the SCCB Business Enterprise Program on state contract meets the ADA requirements.

The ADA compliance and the new FDA requirements of calorie disclosure will be applied as new machines are purchased for blind stand managers that have more than 20 machines in their locations or street routes. Some equipment manufacturers have the FDA requirements built into their software, and the nutrition information can be displayed on the vending machines digital display, or with the ePort system. Pg. 29

In the News



There has been a lot of speculation about what the recent updates mean and when they take effect, as a good partner (and fellow advocate of the Vending Industry) USAT is here to set the record straight.

In an attempt to create greater consumer awareness about the nutritional content of the food we choose to eat, the FDA has updated national food labeling guidelines, some of these changes affect the vending industry, specifically the section titled: "Food Labeling: Calorie Labeling of Articles of Food in Vending Machines (codified at 21 CFR 101.8).

The rule requires vending machine operators who own or operate 20 or more vending machines to declare calories for those items for which the Nutrition Fact label cannot be examined before purchase or for which visible nutrition information is not otherwise provided at the point of purchase (see section 403(q)(5)(H)(viii) of the FD&C Act)

Key Points for operators:

- The intent of the FDA regulation is to provide consumers with the caloric disclosure on or around the machine prior to making the vend purchase, for ALL products being sold.
- The caloric disclosure MUST include the "total calories" being vended. This is different than "calories per serving" because certain consumer product companies label their products as "multiple servings" in the vend package thus misleading the consumer with the total calories in the vend package.
- The caloric disclosure should be readily visible by the consumer while at the machine so that the consumer can see the information, the product in the machine, the price and the product selection - all at the same time.
- The FDA is flexible on how the caloric disclosure is executed as long as the consumer can readily see the caloric information/product/price. Acceptable forms include:
 - On the Product itself – front or back of pack. Should the vend coil block the caloric information, the vend operator is not in compliance.
 - An electronic or digital display
 - Labels or stickers

- Forms of disclosure that do NOT meet the FDA requirements include caloric information on a mobile app or information on the side of a vending machine which is not accessible to the consumer.
- Vending companies are responsible for caloric disclosure – not the consumer product companies

Vending Industry Compliance Dates

The compliance dates for ALL vending machines (including both glass-front and non-glass-front machines) is DECEMBER 2016.

There is one (1) exception to this compliance date for Glass-front Machines, *if and only if the vending company displays the caloric disclosure, from either front or back of pack, on all products in their vending machines*, but the “font size” on the product does not meet the FDA requirements. This compliance has been extended to April of 2018 only for those glass-front machines that meet these requirements.

How can USAT help you stay ahead of these changes

USAT's new [ePort Interactive](#) hardware can provide the nutritional disclosure required by the FDA. Better yet, as the industry's most advanced, touchscreen, cloud based, interactive media, and content delivery platform is supported by USAT's industry leading [ePort Connect service](#) (a PCI compliant, end-to-end, suite of cashless payment, telemetry



and value-added services) the new interactive technology does a lot more than simply help your operation stay compliant.

ePort Interactive's features that can help keep you ahead of the regulations (and the competition):

- Seamless **Nutritional Integration** with most major VMS programs
- Automatic **Refund/Revend** programs available
- Interactive, Cloud Based **Advertising** Platform
- MORE (**Loyalty**) compliant
- Credit/Debit and **Mobile Wallet** acceptance

Contact your USAT sales representative at 800.770.8539 to learn more.

