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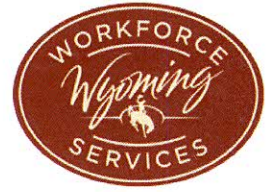
# State of Wyoming

## Department of Workforce Services

### Division of Vocational Rehabilitation

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U.S. Department of Education  
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Washington, DC 20202-4537

Subject: Written Comments on Proposed Revisions to Case Services Report (RSA-911)

The State of Wyoming, Department of Workforce Services, Division of Vocational Rehabilitation (WY-DVR) offers the following written comments on the proposed revisions to the Case Service Report (RSA-911), OMB-Control Number 1820-0508:

#### Implementation Time Frame

WY-DVR does not have a concern with the timeline for the implementation of the RSA-911 changes. The concern, however, is that the changes to the Annual Vocational Rehabilitation Program/Cost Report (RSA-2) are impacted by the data reported in the RSA-911. By requiring one to be implemented in FFY 2013 and the other in FFY 2014, this will cause problems in making modifications to our case management system which will affect both reports. In order to avoid this from happening WY-DVR would need to maintain two data system for a fiscal year and require staff to manually input data into both systems. WY-DVR recommends that the revised RSA-2 be delayed until FFY 2014, which starts October 1, 2013, ends on September 30, 2014 and would require a due date for the RSA-2 on December 31, 2014.

#### Computer Programming Capacity and Cost

WY-DVR's case management system, which was implemented in 1998, is based on Software AG's Computerized Rehabilitation Information System (CRIS). WY-DVR's case management system is an event driven application on a client-server platform. WY-DVR is concerned that due to computer programming capacity limitations, its case management system may not be able to handle the modifications required by both the revised RSA-2 report and the pending revised RSA-911 report.

Additionally, the Rehabilitation Services Administration (RSA) estimates that it will take approximately 160 hours for outside contractors to program the computer system changes needed for the revised RSA-2. When these 160 programming hours are combined with



RSA's estimated 200 hours for outside contractors to program the computer system changes needed for the pending revised RSA-911, the total is 360 hours. Currently, WY-DVR pays \$131.31 per hour for computer programming services from outside contractors. The estimated total cost to WY-DVR to implement the computer changes for both the revised RSA-2 and the revised RSA-911 is \$47,271.60. This figure does not include the WY-DVR staff time and costs associated with testing the computer programming changes and training its staff on the new requirements of both revised reports.

## Disability Coding

Requiring the use of ICD and DSM codes will add a burden to WY-DVR as it will increase the cost of obtaining medical and psychological diagnostics that have the proper coding. WY-DVR may also need to contract with medical consultants to provide the staff with the proper diagnostic codes. WY-DVR staff are not qualified to select the appropriate codes and this may place the counseling staff in an ethical dilemma and WY-DVR at risk for liability issues related to misinformation in the consumers' records. The change to the ICD and DSM codes will not provide the staff with more information to better serve individuals with disabilities as the codes are only a clinical diagnosis and do not provide information related to a functional impairment and condition.

DSM is currently undergoing a revision and the ICD periodically goes through updates, so which version should WY-DVR prepare to use and train their staff on?

Since the RSA-911 only reports data on clients that have been closed, what is WY-DVR to do with the clients that are currently in the system? Will RSA be providing a crosswalk to aid in the recoding of the currently open cases in order to insure that the data produced in November 2014 matches the new coding system? If a crosswalk is not made available, WY-DVR will have to unnecessarily send all clients for medical or psychological consultations to obtain the current ICD or DSM codes. This is an unnecessary expense that will take fiscal resources away from the needed services to return individuals with disabilities back to employment.

## Supported Employment Goal

Supported Employment is a service, not a goal. WY-DVR's current practice is to identify a specific employment goal on the IPE for a client who receives supported employment services. It's unclear how this would be coded given the directions.

## Comparable Benefits

WY-DVR does not see how it would be possible to gather accurate data. It is not always known at the time of IPE development or at service authorization whether or not a client will have access to a comparable benefit. The exception may be the availability of a Pell Grant, as WY-DVR requires all clients seeking Post-Secondary training to provide documentation of Pell Grant eligibility. If a service does not require payment from VR, an authorization for service would not be created and therefore no data would be obtained on the use of a comparable benefit. Staff would also be placed in a dilemma of trying to

rank (primary, secondary, tertiary) a comparable benefit without guidance from RSA.  
Should the rank be determined by source, amount, ...?

#### New or More Specific Service Codes

The revised RSA-911, includes a new service category named "Vocational Rehabilitation Counseling and Guidance." Given RSA's restrictive definition of this new service category, WY-DVR thinks it may have nothing to report on the RSA-911 for this new service category. In WY-DVR, counseling staff are not clinicians and they are not therapists. If WY-DVR purchases clinical level counseling and guidance or therapeutic counseling and guidance, the number of clients served and costs incurred will be reported in the service category named "Diagnosis and Treatment of Impairments."

WY-DVR's computerized case management system has services codes for "Job Development". On the current RSA-911, we have been reporting the "Job Development" costs in the "Placement" category. On the revised RSA-911, new service codes have been added for "Job Search Assistance", "Job Placement Assistance", and "Customized Employment Services." It will be challenging for WY-DVR to train its staff and vendors to separate the "Job Development" services into the three new, more specific categories.

Thank you for considering our comments regarding the revised RSA-911 report. If you have any questions regarding our comments, please contact me at (307) 777-7389 or by e-mail at [jim.mcintosh@wyo.gov](mailto:jim.mcintosh@wyo.gov).

Sincerely,



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