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U.S. Department of Education
400 Maryland Avenue S.W.
Washington, D.C. 20202-4537

SUBJECT: COMMENTS ON NOTICE OF PROPOSED INFORMATION COLLECTION,
OSERS, CASE SERVICE REPORT (REHABILITATION SERVICES ADMINISTRATION
(RSA)-911)

I have reviewed the proposed changes to the RSA-911 Case Service Report and am very concerned that certain elements of the proposed changes impose undue burdens on State Vocational Rehabilitation Agencies. My comments attached.

I appreciate the opportunity to share my concerns.

Sincerely,

Andres Aguirre, Interim Director

Washington VR Comments on RSA-911 Proposed Changes

RSA-911 Proposed Data Element Number & Name	Comment
#18 – Involvement with Other Agencies and Services at Application - Primary	<p>Agencies that refer clients for VR services are already identified on the RSA-911 report. In addition, services provided to clients as comparable benefits (primary, secondary and tertiary) are already reported as well. It is redundant and unnecessary to require information about agencies/organizations that a client is associated with but which is not playing any substantive role in the VR process.</p> <p>Clients already are asked to provide extensive information about their involvement with agencies that refer them to VR and/or offer them comparable benefits that play a direct role in their achievement of an employment outcome.</p> <p>Asking clients to provide information about other agencies they are associated with that have no direct bearing on their progress through the VR process is not necessary and does not contribute to the efficiency of service delivery.</p>
#19 – Involvement with Other Agencies and Services at Application – Secondary	
#20 – Involvement with Other Agencies and Services at Application – Tertiary	
#24 – Primary Disability - Physical Impairment	<p>In May 2013 a new Diagnostic and Statistical Manual of Mental Disorders will be released. Since the RSA-911 disability codes are based on the DSM, any changes in this section of the report should be delayed until after the DSM-5 is released. In order to allow state VR agencies time to update their data systems and make adjustments for new DSM-5 codes, these elements of the RSA-911 report should be delayed to 2015 otherwise it is likely states will have to update their systems twice.</p> <p>In addition, when existing disability codes are replaced by codes from the International Classification of Disease (ICD) and DSM, it will be <i>imperative</i> that</p>
#25 – Primary Disability - Mental Impairment	
#26 – Secondary Disability - Physical Impairment	
#27 – Secondary Disability - Mental Impairment	

Washington VR Comments on RSA-911 Proposed Changes

RSA-911 Proposed Data Element Number & Name	Comment
	<p>RSA provide a comprehensive crosswalk between the current and new disability codes, along with significant guidance and instruction on how to navigate through the ICD and DSM codes to assure correct and consistent reporting. The current RSA-911 includes 19 disability categories and 39 causes. Combined, the ICD and DSM contain hundreds of codes, some of which appear in both. For example, narcolepsy and ADHD are both listed in the ICD and DSM. Unless RSA provides a comprehensive crosswalk that bridges from the current disability codes it will take my agency hundreds of staff hours to assure the new codes are correctly implemented.</p>
#52 – Supported Employment Goal	<p>The RSA-911 proposed changes use the term supported employment <u>goal</u> which is not a term used in federal VR regulations, 34 CFR Parts 361 or 363, nor is it used in RSA's policy directive for completion of the current RSA-911 report. In the federal regulations the term supported employment <u>services</u> is used, and RSA's policy directive uses the term supported employment <u>status</u>. I recommend keeping the present language and not introducing the new terminology of supported employment <u>goal</u>. Clients who require supported employment <u>services</u> pursue a vast array of different <u>employment goals</u>. It is crucial to preserve the distinction that supported employment is a VR service delivery element that facilitates achievement of the client's employment goal, and not introduce the concept that supported employment is an employment <u>goal</u>. If supported employment is to be reported as an employment <u>goal</u>, then CFR 34 Parts 361 and 363 should be revised accordingly prior to any change in the RSA-911 report.</p>

Washington VR Comments on RSA-911 Proposed Changes

RSA-911 Proposed Data Element Number & Name	Comment
#235-241 – Customized Employment Services	<p>While the U.S. Department of Labor has generally defined the term “customized employment,” RSA has not similarly provided any programmatic definition of the term nor clarified how “customized employment” is substantively different than “supported employment.” Before reporting requirements are established for “customized employment,” the term first should be clearly defined by RSA either in federal VR regulations or technical assistance guidance. Based on the definition of “customized employment” in the RSA-911 proposed changes it appears this would be a new VR service category. Until there is programmatic guidance that more clearly defines what this service is it will be impossible to incorporate this new service category in to routine service delivery that is consistent within and between State VR Agencies.</p>