



Oregon

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August 30, 2012

U.S. Department of Education
Rehabilitation Services Administration
400 Maryland Avenue, SW
LBJ
Washington, D.C. 20202-4537

Dear IC Docket Manager:

Re: *Title of Collection: Annual Vocational Rehabilitation Program/Cost Report (Rehabilitation Services Administration (RSA)-2). OMB Control Number: 1820-001.*

The US Department of Education, Rehabilitation Services Administration has asked state rehabilitation programs to comment on proposed changes to the RSA 911 and RSA 2 reports. We have attached our analysis of the issues created by the changes in the 911 report. We would also urge that changes to the RSA2 report not be implemented until our computer software vendor can adapt their system to produce the report accurately.

Thank you.

Sincerely,

David Ritacco
Budget & Performance Analysis Manager



Title of Collection: Annual Vocational Rehabilitation Program/Cost Report (Rehabilitation Services Administration (RSA)-2). *OMB Control Number:* 1820-001.

Impacts of Proposed Changes to RSA 911

Major changes to data and report requirements in the Vocational Rehabilitation business can cause large impacts on budgets and available funds to an agency. In a time of economic downturn these could prove critical to ensuring we are providing services to all qualified clients in need. It is important to the Oregon VR agency that the minimal funds we have are spent in the most appropriate way, ensuring we are meeting the needs of our clients, upholding federal policy and meeting requirements from RSA. The recently proposed RSA 911 requirements will have a large impact on the agency budget due to programming/coding changes, time/labor spent by our counselors entering and researching data, new data gathering requirements, and any training associated with the changes.

Data collection can be extremely useful in identifying process issues, ensuring policy is followed, gathering information on cases for research and general statistics. However, large data requests, redundancy, and unnecessary data collection can lead to inconsistent and incorrect results thus making the collected data irrelevant and useless. Cumbersomeness of proposed RSA 911 data collection will cause inaccurate and incomplete data.

The proposed RSA 911 changes will reduce time VR counselors have to provide services; this in turn will result in less effective and lower quality services provided to clients.

Please review the list below for specific examples of changes that will result in these impacts to Oregon VR.

1. *Additional data element: Involvement with Other Agencies and Services at Application – Primary, Secondary, Tertiary(elements 18-20) –*
 - Cumbersomeness of the reporting will reduce the accuracy of data.

- Labor intensive to report the secondary and tertiary levels causing time spent away from clients.

Question – Wouldn't referral source be the primary agency with which the client is involved?

2. *Change to data Element: Primary and Secondary Disability – Physical and Mental Health (elements 24-27) –*

- Change to the disability codes will be extremely time intensive as counselors or HSA's will need to look up the codes, resulting in time away from clients (Counselors would have 14,452 codes to possibly consider in entering the Primary and Secondary Disability. 14,000 ICD codes and 452 DSM codes).
- Change will result in additional costs if medical consultants have to be paid to review documents to identify appropriate codes.
- Extra time and cost involved in the necessary training of counselors and support staff on the ICD and DSM coding schemes.
- Result in more inaccurate and inconsistent data on disabilities due to the cumbersomeness and labor intensiveness of coding according to these coding schemes.

Question – How does the more detailed coding of the client's disability improve the performance of the VR program? Do the costs and time/labor needed outweigh the benefits of collecting this data?

3. *Change to element: Significant Disability (element 28) –*

Question – RSA does not provide a definition to 'Most significantly disabled.' Currently states vary in their definitions. How would data be accurate and what would it be used for if each state defines this differently?

4. *Change to element: Supported Employment Goal (element 52) –*

- Adds to cumbersomeness of data reporting that will result in inaccurate data and time reduced from client services.

Question – What is the purpose of this change? Couldn't this be better accomplished by a survey of states or a sampling by the RSA monitors of cases?

5. *Change to element: Services Provided and Costs for Purchased Services(element 53-248) –*

- Cumbersomeness of the reporting will reduce the accuracy of data.
- Labor intensive to report the secondary and tertiary levels causing time spent away from clients.
- The comparable benefits (secondary and tertiary providers) will be cumbersome to collect and probably inaccurate.
- Even if Alliance could automate this, the States will still be passed on the costs of doing this (in a period of ever shrinking federal and state funds).

Question – The code for the amount of the Title VI-B funds spent on the service does not make a lot of sense. The amount of funds for this title is miniscule. Why not roll the Title VI-B and Title I codes together?