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**Subject:** Written Comments on Proposed Revisions to Annual Vocational Rehabilitation Program/Cost Report (Rehabilitation Services Administration [RSA]-2). OMB Control Number 1820-001

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 Annual Vocational Rehabilitation Program/Cost Report (RSA-2) [OMB Control Number 1820-001]:

Implementation Time Frame

WY-DVR has major concerns regarding the implementation time frame for the revised RSA-2. The revised RSA-2 will be distributed to agencies by December 1, 2012 with the first submittal of the revised RSA-2 due by December 31, 2013. Although this appears to be a full year, the Federal Fiscal Year (FFY) 2013 to which the revised RSA-2 will apply actually starts on October 1, 2012. So by the time the agencies start implementing the changes, the agencies are already two months into the new FFY 2013. Given the implementation time frame, WY-DVR does not feel there is enough time to make computer program changes, test the computer program changes and train its staff on the new requirements.

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. If the revised RSA-2 is delayed until FFY 2014, this time frame will match the implementation of the revised RSA -911 Case Service Record Report. Because data used for both reports is very similar, it makes sense to implement them on the same time frame.

## 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 (Case Service Record 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.

### Cash Basis (on revised RSA-2) vs. Accrual Basis (on current RSA-2)

The current RSA-2 shows the expenditures on an accrual basis (actual expenditures plus unliquidated obligations). The proposed revised RSA-2 will show the expenditures on a cash basis (actual expenditures paid within the FFY, regardless of which FFY grant period to which the expenditures belong). This change from the accrual basis to the cash basis will require some significant programming changes and testing in our client management system. Additionally, for the current RSA-2 report, the WY-DVR staff balances the total accrual basis expenditures to the year end federal financial status reports (SF-425 reports) for the Vocational Rehabilitation (VR) and Supported Employment (SE) programs. With the change of the revised RSA-2 to a cash basis, WY-DVR will need to develop a new report in Excel that will total the actual expenditures paid between October 1 and September 30, regardless of which FFY grant period to which the expenditures belong. WY-DVR will use this new Excel report to make sure all the expenditures paid in one year are recorded on the revised RSA-2.

### Proposed Instructions are Unclear

The proposed instructions for the revised RSA-2 report, Section III are unclear. For example, the instructions on page 9 for Schedule III state that "The dollar amounts to be reflected on this schedule are the same as the total of the amounts included in Schedule I, Section 2, Service Expenditures." It is not clear whether the total for Schedule III should equal the total of Schedule I, Section 2 (2A Services Provided by Agency Field Office Staff **plus** 2B Services Purchased by Agency from outside sources) or should the total of Schedule III equal just the total of 2B Services Purchased by Agency from outside sources (as required on the current RSA-2). The confusion for WY-DVR also comes from another sentence on page 9 of the instructions for Schedule III, which states "The

services and expenditures included in Section III are the same services and expenditures of those of the RSA-911 report.” WY-DVR’s computerized case management system does not track the field office staff expenditures so those staff expenditures have not been reported on the RSA-911 report in any specific service categories.

Additionally, if the total of Schedule III is to equal the total of Schedule 2 (2A plus 2B), WY-DVR will have a difficult time determining which category to report its Agency Field Office Staff costs because WY-DVR does not require its field office staff to report hours by service category. For example, WY-DVR field office staff members are not required to keep track of how much time they spend on Assessments, Job Search Assistance, Job Placement Assistance, etc. Although a new service category named “Vocational Rehabilitation Counseling and Guidance” has been added to the revised RSA-2, the instructions specify that this service is distinctly different from the general counseling, guidance and case management services provided by the field office staff. So given the fact that WY-DVR field office staff members do not track their time by service category, WY-DVR is unclear where to report its field office staff costs in Schedule III, if in fact that is the new requirement of the revised RSA-2.

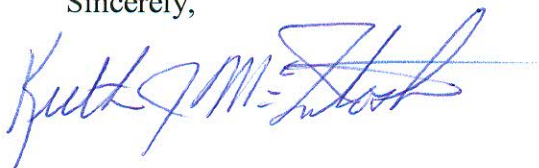
#### New or More Specific Service Categories

The revised RSA-2, Section III 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-2 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-2, we have been reporting the “Job Development” costs in the “Placement” category. On the revised RSA-2, new service categories 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-2 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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