

ND Division of Vocational Rehabilitation
911 Comments – Submitted 6/15/2015

Page ten of the paperwork reduction act submission states that RSA “proposes to reduce the burden to respondents by eliminating redundant elements and reorganizing some elements of the form.” Eliminating three fields, but adding 60 plus fields in no way reduces the burden. Page ten also says the data is due 60 days from end of each calendar quarter. However, page viii of the reporting manual says 45 days. 60 days is far more feasible. Please clarify which is correct.

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Page six of the paperwork reduction act submission has the following for the burden type for collecting new RSA-911 data:
15 minutes x 125 counselors divided by 60 minutes yields 31.25 hours per agency, and a cost of \$695.94 per agency. RSA should also factor the number of clients. The results need to be multiplied by average number of applications per quarter – which will yield a far greater, but more reasonable, of a cost burden.

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Page viii of the reporting manual lists data elements that are not modified or updated during the life of the case. RSA must allow fields to change on open cases. Specifically the SSN. Here is a scenario that happens quite often: In fact, for transition students, the following occurs with a large percentage of the applicants: A student does not know their SSN, gives an incorrect SSN, or refuses to give their SSN. Weeks or months later, VR gets the correct SSN and enters it into the case management system. Obviously, this must be done for a myriad of reasons, such as SSA reimbursement claims, benefits planning, presumption of eligibility, etc.

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Page viii of the reporting manual lists data elements that are not modified or updated during the life of the case. RSA must allow for all fields to be changed on open cases. When it is determined later that a typo or error was made, we must be allowed to make the correction for accurate reporting. The statements 'No modifications after initial entry' should be removed from ALL field definitions in the instructions (as it was done for the gender field).

Your Comment Tracking Number: [1jz-8jfr-syya](#)

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RSA should have definitions of the new data elements, unless the intention is the coding for these is purely subjective. The new data elements that would be subjective are:

Indicators of poor work history at application

Lack of work experience at application

Lack of educational or occupational skills attainment at application

Dislocation from high-wage and high-benefit employment at application

Limited English, low literacy, cultural barriers at application

Welfare dependency at application

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Page 12 of the reporting manual has data element #28 'Foster care youth status at application', with 1 indicating 'Is currently or has been a foster care youth'. Please clarify if this question only applies to youth. It's the "or has been" part that is questionable. Surely RSA does not need to know if a 50 year old applicant was in foster care 40 years ago.

Your Comment Tracking Number: [1jz-8jfr-s7qp](#)

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Page 22 and 23 of the reporting manual has data element #61 'Organizations referred to', which I believe has a typo. The paragraph must have been copy/pasted from the comparable services element, because the paragraph states "If an individual received comparable services or benefits from only an elementary or secondary education institution, enter "10". If no comparable services or benefits were provided, leave blank." I believe it should be changed to: "if an individual was referred to only an elementary or secondary education institution, enter "10". If no referrals were made, leave blank."

Your Comment Tracking Number: **1jz-8jfr-w2er**

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Pages 4 and 5 of the reporting manual has data element #2, SSN, which has a note that says, 'if no SSN is available or provided, wage information will not be able to be verified through unemployment insurance data for the individual. This should also clarify that wage information will also be unavailable for those individuals in self-employment.

Your Comment Tracking Number: **1jz-8jfr-chm2**

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The reporting manual does not say if the new data elements need to be collected for all currently open cases and those closed within the quarter. Collecting these new data elements for cases in eligible status or higher would cause an undue hardship on VR staff. Collecting these data elements on closed cases would be virtually impossible. Please specify that these new data elements are not be collected only on cases with application dates greater than effective date of the final RSA 911 instructions.

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