

## Part I Agency Workload Data

### A. Information and Referral Services

1. Information regarding the VR/AIVR	
2. Information regarding Independent Living	
3. Information regarding ADA	
4. Other information provided	
5. Total I&R services (A1+A2+A3+A4)	
6. Individuals attending trainings by CAP	

Response: RSA accepts this recommendation. The reporting options under Part I.A, Information and Referral Services, have been expanded by deleting the single option regarding information about programs funded under the Rehabilitation Act and including separate options for information about the vocational rehabilitation (VR) program, independent living programs, the American Indian VR Service projects and the CAP.

### B. Individuals Served

Recommendation: Individuals, who come back to CAP in the same fiscal year but, due to a different problem area, can be counted separately.

Response: RSA-227 form currently identifies individuals who had multiple case files open during a fiscal year under Part II.A, Line 4.

### D. Reasons for closing individual case files

Recommendation: add "Individual represented themselves" as one of the reasons for closing the case.

Response: RSA did not add this additional option as CAP should identify why individuals chose to represent themselves through the available options.

### E. Results achieved for individuals

Recommendation: add "Compromise Reached" as one of the results achieved

Response: RSA did not include this option since "compromise reached" is not a specific result. CAP has the option to identify partial issues resolved in the client's favor under Part II.D, Line 2.

## Part II Program Data

### C. Race/ethnicity

Recommendation: add "more than one race/ethnicity"

Response: RSA does not have the authority to modify the section "Race/ethnicity of individuals served" since this field is directed by the Office of Management and Budget (OMB), as a universal collection field for all federal agencies collecting consumer information. In addition, CAP has the option of choosing "Two or more races" on Line 7 of Part III.C.

**D. Primary disabling condition**

Recommendation: revise the disability conditions to use current terminology and align it closer to terminology used in VR reporting

Example: change 10. Mental retardation to Cognitive/Intellectual

Add: Autism Spectrum Disorder

Response: RSA has updated the lists of disability codes to be reflective of the disability codes currently collected by other protection and advocacy programs. The disability codes used by VR agencies include a combination of cause and source of impairment to determine all disability codes, which would not be appropriate for this report. The current list of impairments does not include “mental retardation” and already includes “Autism Spectrum Disorder”, as suggested by the commenter.

**E. Types of Individuals Served: Multiple responses permitted.**

1. Applicant of VR	
2. Eligible on VR Waiting List	
3. Client of VR	
4. Applicant/Client of IL Program	
5. Applicant/Client of AIVR (American Indian VR)	
6.High School/Transition Student	
7.College Student	
8. Unemployed Adult	
9. Employed, needing assistance	
10. Employed in a sheltered workshop	
11. Seeking self-employment	
12. Self-employed, needing assistance	
13. Other	

Response: An additional Section E was added under Part III-Program Data to include “Types of Individuals Served.” As a result, the RSA Form-227 report will now collect information on whether individuals served by CAP were applicants for VR services, individuals eligible for VR services not currently on a waiting list due to the implementation of an order of selection, individuals eligible for VR services currently on a waiting list, applicants for or eligible to receive independent living services, transition students, and all other applicants or individuals eligible for programs or projects funded under the Rehabilitation Act.

**F. Source of concern: Multiple responses permitted**

1. VR agency	
2. VR agency service provider	
3. American Indian VR (121 Project)	
4. IL Program	
5. Other Rehabilitation Act sources	
6. Employer	

Response: RSA believes “Source of Concern” is an unnecessary field as the source of the concern can be identified under “Problem Areas”, Part II.B.

Part II G. Problem Areas/Case Issue: Multiple responses permitted

Eligibility process/OOS	
Application to Eligibility Exceeded 60 days	
Communication issues between individual and VRC	
IPE development	
Conflict over choice of goal or service provider	
Conflict over approval of services	
Delay in response or delay in service delivery	
Case closed	
Post-employment	

Response: Part II.B, Problem Areas, has been expanded to include independent living services and assignment to an order of selection priority category as additional options.

H. Type of CAP service provided: Recommend changing to multiple responses permitted

Advisory/interpretational	
Negotiation	
Self-advocacy advice/coaching	
Administrative/informal review	
Alternate dispute resolution	
Formal appeal/impartial hearing	
Legal remedy	

Response: RSA believe one response for each individual served is critical for reporting purposes. As such, the total for "Type of CAP services provided" must be equal to the total number of individuals served on Line 3, Part II.A. The instructions discuss how multiple cases should be handled for this category.