

OMB 1820-0563 RSA-722 Report on Client Appeals
Attachment to Item #8 on Supporting Statement

We received comments from two individuals relevant to this information collection. Below is a summary of their comments and our responses.

Making RSA-722 Data Available Nationwide

Comments: One commenter suggested that the utility of the report could be enhanced by making all RSA-722 reports accessible to the public. This commenter from a State Vocational Rehabilitation (VR) agency indicated that the agency and the State Rehabilitation Council (SRC) typically review all agency reports and consider this information in evaluating the agency's delivery of VR services. The agency and the SRC would find a comparison of their data with the data from other agencies informative when evaluating the agency's service delivery.

Response: RSA will consider creating an aggregate report of certain data on the RSA-722 submitted by the 78 VR agencies that could be viewed by all VR agencies. No changes to the RSA-722 are required as a result of this comment.

Suggestions for Minimizing Burden

Comment: One commenter also indicated that RSA could minimize the burden related to submitting copies of hearing officer decisions and any revisions to due process policies by allowing the use of information technology.

Response: In an effort to minimize burden on the State VR agencies, in the instructions to the RSA-722 form published on December 23, 2020, RSA informed State VR agencies that it will no longer require them to mail hearing officer decisions and changes to due process policies to the Department. Rather, RSA will allow the State VR agency to submit this information via an encrypted file attached to an e-mail. Therefore, no change to the form or instructions is necessary to address this comment.

Requested Edits to RSA-722 form

Comment: One commenter from a State VR agency requested that RSA include the timeframe covered by the RSA-722 report. The commenter also indicated that Line II.A.4 and Line I.A.3 appear duplicative. Finally, the commenter recommended that the

word “resolved” in Lines II.B.5 and II.B.6 be replaced with the phrase “ruled on” when reporting the number of disputes engaged in the impartial hearing process.

Response: With respect to the timeframe covered by the report, both the RSA-722 form and its instructions, as published on December 23, 2020, make clear that each report covers a Federal fiscal year.

With respect to the confusion regarding data collected on two lines of the report, RSA wants to make clear that these two lines collect different information. Line II.A.4 requests the number of impartial hearing requests that went through the mediation process, whereas Line A.1.3 requests the total number of mediation requests.

The word “resolved” is unambiguous and consistent with the statutory and regulatory requirements for this information collection. Therefore, no change is being made to the form or instructions based upon the commenter’s recommendations.