



From: Disability Rights Michigan, Client Assistance Program (“CAP”)

Report for MCRS May 8, 2025 Quarterly Meeting

Vocational Rehabilitation Informal Dispute Resolution Recommendations

- Based on the CAP’s experiences with MRS administrative hearings and assisting self-represented clients in hearings, the CAP has recommended that MRS and BSBP adopt new informal dispute resolution procedures. The CAP is including those recommendations with its report to the MCRS.
- The CAP will engage with MRS and BSBP about these recommendations and will report back to the MCRS at the August 14, 2025 meeting.

Hearings

- The CAP is currently representing three clients in pending MRS hearings.
- In the second quarter of the fiscal year:
 - The CAP and MRS resolved two pending hearings prior to the hearing dates.
 - The DRM education team and MRS resolved a pre-ETS related hearing prior to the hearing date.
 - The CAP also assisted MRS and another client in resolving a pending hearing request prior to the hearing date.
 - The CAP assisted two clients for MRS hearings where the clients were representing themselves. Both hearings were completed in the second quarter.
 - The CAP assisted two other clients with submitting hearing requests to MRS where the CAP had not agreed to represent the clients at the time of the hearing request.
 - One of those hearing requests was resolved by MRS and the client.

CAP MRS FOIA Request

- The CAP asked MRS to provide copies of what the CAP believed were non-public agency rules (“ADMs”). MRS denied the request, and the CAP requested the rules under

Michigan's Freedom of Information Act ("FOIA"). MRS provided the ADMs to the CAP pursuant to FOIA for a processing fee of \$357.

MRS and BSBP Service Manual Amendments

- The CAP provides comments to MRS and BSBP concerning the agencies' proposed amendments to their services manuals.
- The CAP focuses its comments on alignment between the federal regulations and the agencies' services manuals.
- **MRS**
 - 5100 Comparable Services and Benefits
 - CAP comments focused on ensuring provision of services when comparable benefits and services are not available when needed
 - 7000 Vocational Rehabilitation Case Record Closure
 - 2100 Confidentiality and Release of Information
 - 3.0 Eligibility
 - CAP comments focused on residency-related documentation requirements, role of trial work experiences in ineligibility determinations, use of existing information in eligibility assessments, and the definitions for the disability priority categories used in an order of selection.
- **BSBP**
 - Referral for Pre-Employment Transition Services
 - CAP comments focused on the definition of a Student with a Disability, specifically concerning students not receiving services under IDEA but who fall within the definition of an individual with a disability for purposes of section 504 of the Rehabilitation Act.
 - Vocational Rehabilitation Employment Services - Introduction

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