

RSA Frequently-Asked Questions about the RSA-911 (8.8.2016)

1. What has changed in the RSA-911?

The RSA-911 (OMB Control Number 1820-0508), approved by the Office of Management and Budget (OMB) on June 29, 2016, represents a substantial revision of RSA-911-14-01 (RSA-911-14), dated October 25, 2013. Two of the most significant changes include the reporting of open service record data (rather than the closed service record data required historically) and the reporting on a quarterly basis (rather than on an annual basis as done historically). The majority of the data elements are either new or revised. Each principal data element contains a field titled “change” that indicates whether the data element is “new,” “revised,” or unchanged (“none”). Revisions to the RSA-911 encompass new data elements to comply with new requirements of section 101(a)(10) of the Rehabilitation Act of 1973 (the Act), as amended by title IV of the Workforce Innovation and Opportunity Act (WIOA), and section 116 of title I of WIOA, as well as revised instructions or reporting codes for data elements that existed previously. Detailed information for each field is included in the RSA-911 Case Service Report Manual, dated September 2016 (RSA-911-16 Manual). The RSA-911-16 Manual is available at <http://www2.ed.gov/programs/rsabvrs/rsa-911-case-service-report-manual-2016.pdf>.

2. Why must VR agencies submit open service record data quarterly under the new RSA-911?

In order to align the Vocational Rehabilitation (VR) program (which operates on a Federal fiscal year (FFY) basis) with the other five WIOA core programs (which operate on a program year (PY) basis) to the extent practicable, VR agencies must report participant data in a manner consistent with the jointly-administered requirements set forth in the final joint WIOA regulations and the WIOA Common Performance Reporting Information Collection Request (ICR) (approved by OMB on June 29, 2016 (OMB Control Number 1205-0526)). Section 116(a) of title I of WIOA establishes performance accountability measures that apply across the six core programs, including the VR program, to assess the effectiveness of States and local areas in achieving positive outcomes for individuals served by those programs. The primary indicators of performance, set forth in section 116(b)(2)(A)(i), are calculated on a PY basis (i.e., July 1-June 30). Because the VR program’s FFY (i.e., October 1-September 30) spans two different PYs by an overlap of one quarter (July 1-September 30) and, therefore, many participants are served by the VR program for more than one PY, the data must be reported on a quarterly basis to ensure the required data are available for the entire PY. In so doing, the VR program can ensure compliance with the performance accountability requirements of section 116 of WIOA and data comparability with the other core programs. Furthermore, the collection of quarterly data will allow RSA to analyze the data on both a PY and a FFY basis, thereby providing RSA the ability to develop required FFY reports without additional data collection and reducing the burden on State VR agencies.

RSA is requiring VR agencies to collect and report open service record data to ensure compliance with the requirements of section 101(a)(10) of the Act and section 116 of WIOA. Collecting data only after service record closure, as had been done historically, would result in

the data elements for many participants not being available for reporting purposes during a given PY.

3. When must VR agencies begin the process of collecting data under the new RSA-911?

In accordance with section 506(b) of WIOA, the performance accountability system requirements of section 116 of WIOA took effect July 1, 2016. At that time, VR agencies were expected to begin the process of implementing the final RSA-911-16 data collection. However, we recognize that agencies may have difficulty implementing the new data requirements quickly enough to submit reports containing the new data elements for PY 2016. Therefore, the Department of Education (ED) is exercising its transition authority under section 503 of WIOA to ensure the orderly transition from the requirements under the Act, as amended by the Workforce Investment Act of 1998, to the requirements of WIOA. In so doing, VR agencies must begin to submit data required by the RSA-911-16 in PY 2017. VR agencies must submit the first quarterly RSA-911-16 report for PY 2017 by November 15, 2017, covering the reporting period from July 1, 2017 through September 30, 2017, for all service records (including students receiving pre-employment transition services, reportable individuals, and participants) open as of or after July 1, 2017. VR agencies must ensure that they begin implementation of the data system requirements in PY 2016 and that their data collection systems, including internal controls necessary to ensure the reliability and accuracy of the data being reported, support accurate and timely reporting of data no later than the start of PY 2017 (July 1, 2017).

4. What data under the revised RSA-911-16 must VR agencies submit for FFY 2016?

None. As stated above, VR agencies will begin to report data required by the new RSA-911-16 in PY 2017. VR agencies will submit RSA-911 data in accordance with RSA-PD-14-01 (RSA-911-14), dated October 25, 2013 for FFY 2016 (October 1, 2015-September 30, 2016). The FFY 2016 data collection will use the same format and submission process as was used in FFY 2015. The submission due date for the annual FFY 2016 RSA-911-14 data is November 30, 2016.

5. What RSA-911 data must VR agencies report for the nine-month period between October 1, 2016 and June 30, 2017 (i.e., the first nine months of FFY 2017)?

For the first nine months of FFY 2017 (October 1, 2016-June 30, 2017), VR agencies will continue to submit closed service record data in accordance with the requirements set forth in the RSA-911-14. A partial FFY 2017 RSA-911-14 report for the reporting period October 1, 2016 through June 30, 2017 must be submitted to RSA by August 30, 2017. This will be the last RSA-911-14 closed service record data report using the former RSA-911-14.

6. Must VR agencies report the complete RSA-911-16 data collection for the quarterly reporting period ending September 30, 2017?

Yes. The submission of the first quarterly RSA-911-16 report for PY 2017 is due by November 15, 2017, and it will cover the reporting period from July 1, 2017, through September 30, 2017. Therefore, any individuals meeting the definition of a "reportable individual" or "participant" as defined in 34 CFR 361.150[1] and the joint Performance ICR, as of July 1, 2017, must be included in the agency's RSA-911-16 reporting system. Reportable individuals include

individuals receiving pre-employment transition services (regardless of whether they have applied and been determined eligible for VR services)[2] and applicants for VR services. This means that an agency must report data elements in the RSA-911-16 for all individuals who meet the definition of “reportable individual” or “participant” during the first quarter of PY 2017 (July 1, 2017-September 30, 2017), regardless of whether their VR service records were opened prior to July 1, 2017 (i.e., their VR services were initiated prior to that date). Agencies are not required to retroactively report data in the RSA-911-16 for individuals who exited the VR program (i.e., their VR service records were closed) prior to July 1, 2017, regardless of whether they meet the definition of “reportable individual” or “participant.” Data for individuals who exited prior to July 1, 2017, are to be reported through the RSA-911-14. This information is required to ensure that RSA-911-16 data are complete for all “reportable individuals” and “participants” for the first PY 2017 quarterly reporting period ending September 30, 2017.

[1] Most of the regulations in 34 CFR part 361 governing the VR program took effect on September 19, 2016, 30 days after publication in the Federal Register, which occurred on August 19, 2016. The regulations in 34 CFR part 361 Subparts D through F will take effect on October 18, 2016, 60 days after publication in the Federal Register. The regulations in these subparts are part of the jointly-administered regulations with the Department of Labor.

[2] A student with a disability who is receiving pre-employment transition services is a “reportable individual” if he or she has not yet applied and been determined eligible for VR services. However, once the student with a disability who is receiving pre-employment transition services applies, is determined eligible for VR services, and has an approved individualized plan for employment in place, he or she would meet the definition of a “participant” in 34 CFR 361.150(a).

7. Will RSA provide a data edit program for VR agencies to check the accuracy of their RSA-911-16 data?

No. VR agencies are responsible for ensuring that any data submitted conform to data submission requirements. However, RSA will maintain a comprehensive data edit table on the RSA website at <https://rsa.ed.gov>, which will detail, by data element, the edits required to ensure the accuracy and integrity of data submitted. ED will analyze each data submission to determine whether the data are consistent with the edits. ED will return data submissions that fail the edit check to the VR agency for correction and resubmission. More information about the edit process is included in the RSA-911-16 Manual.

8. What data must VR agencies report regarding students with disabilities receiving pre-employment transition services?

A section titled “Pre-Employment Transition Services” was added to the “General Information” included in the RSA-911-16 Manual (see section I.H). This section clarifies the data elements required when an individual receives pre-employment transition services prior to applying and being determined eligible for VR services. The pre-employment transition services-related data

elements included in the RSA-911-16 are those required to satisfy statutory and regulatory requirements. However, if the student has applied for and been determined eligible for the VR program, then all data elements, including the pre-employment transition services-related data elements, if necessary, required of other VR program participants, would be applicable to these students as well.

9. When is the service record of a student with a disability who receives pre-employment transition services considered “closed”?

For a student with a disability who solely received pre-employment transition services and who has not applied or been determined eligible to receive other VR services, the service record is closed when the student is no longer receiving such services as indicated in the pre-employment transition services data elements included in the RSA-911-16 Manual (see section X). Codes were added to the pre-employment transition service data elements to enable agencies to report when those services are no longer being provided. However, if a student with a disability has applied and been determined eligible for VR services, the student’s service record would be “closed” when the student satisfies the definition of “exit” at 34 CFR 361.150(c) because his or her service record is closed pursuant to 34 CFR 361.43 or 361.56.

10. Are Social Security Numbers (SSNs) required for the RSA-911-16?

No. A SSN is not required for an individual to receive services through the VR program and, thus, individuals are not required to provide one. The RSA-911-16 requires VR agencies to report a unique identifier for each individual, thereby enabling ED to report an unduplicated count of individuals receiving services in accordance with the Joint WIOA Performance ICR. If an individual does not have an SSN or chooses not to provide an SSN, only the Unique Identifier is reported. Additional information regarding the Unique Identifier is included in the RSA-911-16 Manual (see section I.C). Although VR agencies are not required to report SSNs, the collection of SSNs by VR agencies will enable them to comply with the employment-related primary indicators of performance required by section 116(b)(2)(A)(i) of WIOA. If an individual refuses to provide the VR agency with a SSN, the VR agency will need to rely on supplemental wage information in order to comply with section 116.

11. How will the incomes of individual’s exiting with self-employment outcomes be reported?

Individuals who receive services through the VR program to assist with the achievement of employment outcomes in self-employment are considered “participants” as that term is defined in 34 CFR 361.150(a) and thus must be taken into account when calculating a VR agency’s performance on those measures. Therefore, individuals with self-employment outcomes will be accounted for in the same manner as other participants under WIOA for purposes of calculating levels of performance. Since the employment status and earnings of self-employed individuals are not always captured through the unemployment insurance wage system, a VR agency may use supplemental wage information to obtain the data necessary for the calculation of its performance. Using such supplemental data ensures that VR programs are able to provide a more representative picture of their performance. If a State uses

supplemental information to report on the employment rate indicators, the State must also use supplemental information to report on the median earnings indicators. In particular, States that elect not to use supplemental information and follow-up methods are expected to include participants who do not have the necessary data points to complete a wage record match in the denominator of the calculation. These individuals will not be included on the third employment indicator (median wage in the second quarter after the exit quarter). ED and the Department of Labor intend to issue additional guidance regarding the use of supplemental wage information.

12. Does the RSA-911 collect all data elements necessary to report the effectiveness in serving employers indicator?

No. The RSA-911 collects individual-level data regarding VR participants that are contained in their VR service records. The data elements collected through the RSA-911 are necessary to determine the State's level of performance under the VR program for purposes of the performance indicators related to participants. These indicators are those related to employment in the second and fourth quarters after exit, the median earnings in the second quarter after exit, credential attainment, and measureable skill gains. The effectiveness in serving employers indicator specifically measures how effective a State is in meeting the needs of employers, which is separate and distinct from the indicators related to the program's performance with respect to participants.

With respect to the effectiveness in serving employers indicator, the WIOA Joint Performance ICR requires each State to choose two of the three approaches (employer retention, employer penetration, and repeat business customer) described in the preambles of both the Notice of Proposed Rulemaking and the Final Rule, as well as any additional measure that the Governor may establish related to services to employers. States must report results related to the effectiveness in serving employers indicator in the first WIOA annual report due in October 1, 2017. The data elements related to the three different approaches are not included in the Joint Performance ICR because it is unknown which States will choose which two of the three possible approaches and which States will elect to establish a completely different approach for measuring performance under this indicator. ED and the Department of Labor anticipate that a revised Joint Performance ICR will be developed to capture data regarding the effectiveness in serving employers indicator once more information is learned as to how the States proceed with this indicator.

Nevertheless, RSA will collect through the RSA-911 certain individual-level data regarding VR participants that could be used by a State to demonstrate the VR agency's effectiveness in serving employers with respect to employer retention of a participant. For participants exiting the VR program with an employment outcome, the RSA-911 requires VR agencies to report whether the participant exiting the VR program had the same employer during the second quarter and fourth quarter after the exit quarter. This data element can be used to inform the employer retention measure. However, the data for the employer penetration rate and the

repeat business customer rate are not data elements specific to an individual's VR services or service record. Consequently, such data are not captured in the RSA-911. For States choosing to implement the employer penetration or repeat business customer approaches to measure a program's effectiveness in serving employers, VR agencies must work collaboratively with their WIOA core program partners to develop and implement the processes necessary to report on the data elements the State selects.

13. Where should questions regarding implementation of the RSA-911 be sent?

Questions regarding the RSA-911 should be sent to RSAData@ed.gov.