

Response to questions from Bridget C. Dooling regarding for RSA-911 extension

1. Given that this collection will be changing soon, does ED need a 3-year approval?
Would a shorter timeframe suffice?

RSA feels that a three-year timeframe is necessary not only to assess current and needed data elements of the RSA-911 to effectively evaluate the vocational rehabilitation program activities and performance but to complete all of the necessary steps for a comprehensive redesign of the form. Accumulating RSA, agency, and stakeholder input, establishing a workgroup, designing the form, preparing instructions, training on the form and the instructions, as well as allowing agencies time for their programming requirements are all part of the process. In order to effectively ensure the accomplishment of this task in a timely manner, a contract was awarded before the end of September 2008 to redesign the RSA-911, the RSA-2, as well as any necessary changes to the RSA-113.

The following statement is included in number 1 of the supporting statement:

“Before the end of this Fiscal Year RSA will be awarding a contract to revise the RSA-911 by adding or revising the data elements collected. The revisions will improve RSA’s ability to monitor and analyze grantee (VR agencies’) performance. In addition, the reporting form’s instructions will also need to be revised to make them more clear and concise. RSA anticipates having a draft revised RSA-911 in summer 2009, a final version entering clearance in winter 2009, and clearance expected in July 2010. Following forms clearance, State agencies will need time to re-program their data collection systems and conduct systems testing. RSA may not be able to implement the revised form until the 2011 reporting year. Data for the 2011 reporting year will be reported to RSA in November 2012.”

2. Regarding A10, does ED have a statutory basis for the promise of "strict confidentiality?" What "strict confidentiality" rules apply to this collection?

Section 101 (a)(10) of the Rehabilitation Act of 1973, as amended includes the reporting requirements of designated state agencies. (C), (D), and (E) list data elements, costs, and additional information to be included some of which require individual information. (F) – Completeness and confidentiality – states that “the identity of each individual for which information is supplied under this paragraph will be kept confidential.”

3. Is ED willing to touch base with OMB on how the RSA-911 redesign is coming along? Perhaps we could set up a briefing in the winter about ED's plans for the collection?

ED/RSA would very much be willing to meet with OMB on the progress of the RSA-911 redesign this winter.