

APPENDIX to the OMB 83-1 SUPPORTING STATEMENT

How the Data Collected via the RSA-2 Address Statutory Requirements of the Rehabilitation Act of 1973, as amended

1. Section 3(b) of the Rehabilitation Act requires RSA to "take whatever action is necessary to ensure that funds appropriated pursuant to this Act are expended only for the programs, personnel, and administration of programs carried out under this Act."

Schedule I of the RSA-2¹ captures the total VR and SE program funds under the control of and expended by state VR agencies.

Schedule II of the RSA-2 provides a total number of labor hours for VR agency staff working on the VR program. This schedule provides a breakdown of staff effort related to the VR program.

Schedule III of the RSA-2 report provides a cost breakdown of the various services provided which serve multiple VR client needs in the administration of the public VR program. These data are collected for several purposes, including both programmatic and financial operations/expenditures tracking. For program management, the data provide a meaningful and critical insight into the extent to which mandatory services are provided by a state program and by the VR program nationally. For fiscal management purposes, the data permit state agencies and RSA to assess the impact of expenditure levels for specific services on outcomes for agency clientele.

2. Section 13 requires that the RSA Commissioner submit an annual report that is full and complete to the President and Congress.

Information in the RSA-2 is necessary for this annual report. Two of the most critical activities carried out under the Act are the expenditure of appropriated monies in furtherance of the goals of the Act and the provision of a variety of services to individuals with disabilities. Schedules I, II, and III provide the bases upon which to inform the Congress fully and completely about these activities. These schedules call for dollars expended and the number of persons in receipt of service types for the fiscal year in question. RSA believes that the categories listed on Schedules I, II, and III satisfy the letter and spirit of the "full and complete" provision in Section 13(a).

3. Section 14(a) articulates a requirement for the conduct of cost/benefit studies when it says “. . . their general effectiveness in relation to their cost . . .” Additionally, OMB has mandated that total dollars must be used in such cost/benefit analyses.

The proper evaluation of program effectiveness (and impact) requires determination of the relationship between program outcomes and program inputs.

Determining effectiveness includes more than the obvious goal of the program, i.e. to rehabilitate persons with disabilities. Included would be, for example, such important goals as:

¹ For the remainder of the appendix, a reference to a "schedule" means a schedule on the RSA-2.

- (a) holding within reasonable bounds, the amount and proportion of expenditures devoted to agency overhead or to construction activities (and away from client services);
- (b) lowering, if necessary, amounts of money spent on and the number of clients in receipt of medical services since these services often indicate cases of persons who are not significantly disabled or who needed only a remedial medical service that could have been provided elsewhere; and
- (c) increasing, if necessary, the number of persons receiving on-the-job training, a service which has proven to be a valuable by-product of governmental and private sector cooperation.

Additionally, OMB requires that RSA project future capacity given proposed budget levels. This requires knowledge of the total amount of money available to and spent by state agencies. This projection activity would not produce sound estimates if millions of state VR agency dollars which are used to take clients into the caseloads, and to serve and rehabilitate them, are not completely accounted for. The availability of these data permits more effective and accurate budget projections to be made.

4. Section 101 provides that the Commissioner be assured that services providable under the Act are being provided in accordance with the individualized plan for employment. (Section 101(a)(9)(B)). Sections 103(a)(1) through (18) and 103(b)(1) through (6) identify and define those services which are available to eligible individuals by VR agencies under the Act.

The data collected on Schedule III measure the extent to which the listed services are provided by the state VR agencies in helping individuals with disabilities achieve employment outcomes.

5. Section 103(b)(2)(A) further includes as a service: "The establishment, development, or improvement of community rehabilitation programs, including, under special circumstances, the construction of a facility."

The data collected on Schedule I, Item 3.A and B of the RSA-2 are needed by RSA to determine the financial extent to which VR community rehabilitation programs (CRP) are established or constructed.

6. Sections 101(a)(24)(A) and (B) require the use of for-profit and non-profit organizations for the provision of services for the rehabilitation of individuals with disabilities.

The extent of such use is measured by the collection of the data on lines 2.B.1 and 2.B.2 of Schedule I of the RSA-2.

7. Section 103(a)(5) requires that no training services in institutions of higher education be paid for with funds from this title unless maximum efforts have been made to secure grant assistance from other funding sources.

The RSA-2 report contains data on the number of clients trained and funds expended for this purpose. These data are analyzed by RSA staff and used to monitor the extent to which VR funds are used for training purposes.

On a related topic, the labor hours reported on the RSA-2 are used as the basis for distributing discretionary training funds for in-service training of state agency personnel and for Rehabilitation Continuing Education Programs. This method of distributing these training funds has proven equitable.