

RSA-2 Responses and Comments

A total of 11 commenters responded to the Notice of Proposed Information Collection for the Annual Vocational Rehabilitation Program/Cost Report (RSA-2), published in the Federal Register on July 2, 2012, including the Council of State Administrators for Vocational Rehabilitation (CSAVR), the membership organization for all 80 vocational rehabilitation (VR) agencies. These commenters provided a total of 35 comments, eight of which addressed the proposed time frame for implementation of the form, 23 related to the form’s instructions and data fields, and several supporting the change and the benefits of streamlining the data collection process.

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1	Eight commenters expressed concern that the proposed FY 2013 implementation date for the RSA-2 form does not provide a reasonable timeframe to make necessary adjustments for the data collection, and proposed pushing the implementation date back to FY 2014 or FY 2015. Commenters indicated the timeframe did not provide sufficient time for the agencies to update data tracking software in their case management systems, secure necessary funds to make the software updates, and train staff. Additionally, the expected implementation of the RSA-911 is FY 2014, and commenters indicated premature implementation of the RSA-2 will misalign the data in the annual reporting and other reports available on the RSA MIS system.	In an effort to align the data collection efforts of the RSA-2 form with the RSA-911 form, the RSA-2 form will be implemented for data collection starting in federal FY 2014.
2	Three commenters noted concerns surrounding the impact of calculating Labor Hours in Schedule II. One inquired how the formula change would impact the agency’s ability to complete the section, as the agency considers 37.5 hours a full-time work week. The second questioned when a full-time position is vacant for a part of the year, whether the position is counted under full-time or part-time employment. The third asked how the calculation change from person years to labor hours will affect the funding of discretionary grants that base award allocation on this data.	Since the calculation itself results in labor hours, RSA will include a data field in which VR agencies may input the number of hours per week considered full-time in their states. The examples provided are to assist agencies in calculating labor hours for staff members who work varying schedules. For positions that are vacant part of the year, the calculation would simply include the hours worked/week X weeks worked, and would not include time in which positions are vacant. The addition of the full-time hours data element will facilitate equal consideration for all states receiving

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		discretionary grants that are determined based upon RSA-2 data.
3	<p>Four commenters responded that the instructions for Schedule III are confusing since they state the dollar amounts to be reflected on Schedule III are the same as the total of the amounts included in Schedule I, Section 2, Service Expenditures; however, Schedule I, Section 2 includes services purchased by the agency, as well as expenditures from services provided by agency field office staff and agency-operated community rehabilitation program (CRP) staff.</p>	<p>RSA concurs with these concerns and has revised the Schedule III instructions to clarify that the dollar amounts on Schedule III should reflect the total of the amounts included in Schedule I, Section 2.B, Expenditures from Services Purchased by the Agency from Public CRPs, Private CRPs, Other Public Vendors and Other Private Vendors. Agencies will not be required to report numbers and amounts for individuals served through Services Provided by Agency (Schedule I, Section 2.A).</p>
4	<p>Two commenters referenced the definition of <u>“Other Services,” including Orientation, Mobility and Rehabilitation Teaching/Training Services.</u> One noted an error referencing an incorrect line on the RSA-2 form stating that expenditures for salaries of staff and support personnel, and other agency expenses for the provision of management and supervision and other services under the Business Enterprise Program, should be reported on Schedule I, line 4C. The reference to Schedule I line 4C should be line 3C.</p> <p>The second commenter inquired as to whether the example of job coaching reference supported employment job coaching or non-supported employment job coaching.</p>	<p>RSA agrees with this comment and will correct the error in the definition of <u>“Other Services,” including Orientation, Mobility and Rehabilitation Teaching/Training Services,</u> to reflect line 3C in Schedule I.</p> <p>Since Schedule I 2.A.1.b and 2.A.2.b include supported employment and Title I VR funds, expenditures related to job coaching include both supported employment and non-supported employment job coaching.</p>
5	<p>One commenter noted in the instructions for Schedule III, Service Category 20 (Rehabilitation Technology), that the inclusion of examples that are not explicitly identified in the Rehabilitation Act or VR implementing regulations should be removed, as the examples could confuse staff into believing that the device, and not the need to overcome disability-related barriers, defines Rehabilitation Technology.</p>	<p>The definition included in the instructions to the RSA-2 was developed from Section 7(30) of the Rehabilitation Act, the definition found at 34 CFR 361.5(b)(45), and the language found at 34 CFR 361.48(q). The definition of “rehabilitation technology” at 34 CFR 361.5(b)(45) includes the terms rehabilitation engineering, assistive technology devices and assistive technology services. The definitions for these terms have been incorporated into the definition for rehabilitation</p>

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		<p>technology found within the instructions for the RSA-2, which is consistent with that contained in the instructions for the RSA-911.</p> <p>RSA specifically included the examples of hearing aids, low vision aids and wheelchairs within the instructions to provide VR agencies clarification and consistency on this subject. The manner in which VR agencies have reported the provisions of these devices varies not only from agency to agency, but has been reported differently within the same agency depending upon the circumstances. RSA believes it necessary to include these particular examples to ensure agencies are reporting the provision of rehabilitation technology consistently.</p>
6	<p>One commenter noted in the instructions for Schedule III, Service Category 25 (Information and Referral) Services, that VR implementing regulations do not require services to be provided through a cooperative agreement, as described in the RSA-2 instructions.</p>	<p>RSA agrees with this comment and has included an “e.g.” before cooperative agreements to indicate that this is an example, but is not limiting the sources through which information and referral services may be provided.</p>
7	<p>One commenter indicated that GED training be moved from Service Category 13 (Miscellaneous Training) in Schedule III to Service Category 10 (Basic Academic Remedial or Literacy Training).</p>	<p>RSA disagrees with this comment as GED training is a more advanced level of training than obtaining basic or remedial functioning to meet the minimum standards to function on the job in the competitive labor market.</p>
8	<p>One commenter was concerned about Schedule III, Service Category 27 (Customized Employment Services), asking what type of services are included in this category; if RSA expects VR Counselors to track their time, so cost can be associated with this category; and how will an agency differentiate between job coaching in a non- customized setting from job coaching in a customized setting? The agency requested that this category be eliminated, or, if retained, described in much further detail, so that</p>	<p>RSA reiterates that the instructions describe the type of services to be included under Service Category 27 (Customized Employment Services). RSA clarified that VR Counselor time is not reported under Schedule III, because only expenditures from purchased services are reported. Job Coaching is reported in Service Categories 16 and 17 related to On-the-job Supports, and should not be reported under Customized Employment Services.</p>

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	expectations are clear.	
9	One comment inquired as to whether RSA will provide technical assistance and training related to the RSA-2 form.	RSA plans to provide training after the final policy directive for the RSA-2 form is released. Grantees will be notified of training opportunities prior to their availability.
10	One commenter indicated that the proposed changes list degrees at colleges that are not possible to attain at those places. The example provided was that a vocational degree cannot be obtained at a university, and this option should be removed.	RSA reviewed the instructions related to Schedule III, Service Category 7 (Occupational or Vocational Training), which indicates occupational, vocational, or job skills training provided by a community college and/or business, vocational/trade or technical school to prepare students for gainful employment in a recognized occupation, not leading to an academic degree or certification. This definition does not reference universities and RSA substantiates that the description is accurate.
11	One commenter inquired as to whether RSA was using a cost-benefit analysis using RSA-2 data based upon a formula used by the Government Accountability Office (GAO), and that the RSA-2 form should only include data related to costs of individuals achieving an outcome, not open cases.	RSA does not utilize a cost-benefit analysis formula from GAO or other offices. RSA reiterates that the RSA 2 report must reflect all expenditures for the VR and SE programs made during the FY from federal, state and other rehabilitation funds. Reporting of costs restricted to outcomes does not provide data on the entirety of monetary effort spent on the vocational rehabilitation program. This effort allows RSA to determine the average cost of the services the VR program provides, compare single agency data across a given timespan, as well as make comparisons between agencies and to national averages. RSA has eliminated the first bullet on page 1 that referenced agency goals, and has clarified how the data analysis is used.
12	One commenter inquired as to how expenditures for consultative and technical assistance services to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including employment (Services to Groups) should be accounted for, and	Expenditures for services to groups should not include expenditures related to the provision of services to individuals identified on the individualized plan for employment (IPE). Since VR staff costs are included in Schedule I, Section 2.A, the Services to Groups costs should only

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	if it should utilize staff time related to percentage of cases in a particular status.	<p>represent the expenditure of VR funds on purchased services, including consultative and technical assistance services to educational agencies in planning for the transition of students with disabilities from school to post-school activities. This may include paid training sessions or contracts with providers to conduct training or provide technical assistance.</p> <p>RSA added a category for Transition Consultation and Technical Assistance (3.D.) under Services to Groups in Schedule I to clarify that these expenses should be included.</p>
13	Two commenters made reference to the fact that the RSA-2 instructions indicate expenditures for the report do not include unliquidated obligations. One commenter indicated that this will require the agency to implement modifications to its accounting system because the new form requires it to change from the modified accrual basis to a cash basis of accounting. The other commenter indicated that since no unliquidated obligations are included on the RSA-2, it will be required to make programming changes and conduct testing of its case management system.	RSA confirms that the RSA-2 report requires agencies to only report liquidated expenditures, and excludes unliquidated obligations; however, this change does not require VR agencies to change their accounting to a cash basis. Since the RSA-2 requires accrual information, if the recipient's accounting records are kept on the cash basis, the recipient shall not be required to convert its accounting system. Instead, the recipient must develop such accrual information through best estimates using available documentation, in accordance with OMB Circular A-102. This approach is consistent with the reporting requirements for the Federal Financial Report (SF-425).
14	One commenter noted that the description of Schedule III, Service Category 3 (Vocational Rehabilitation Counseling and Guidance) is a new category that appears to overlap with Category 2 (Diagnosis and Treatment of Impairments).	RSA concurs and will be using the description of Vocational Rehabilitation Counseling and Guidance as it is written in the VR implementing regulations.
15	One commenter indicated that since new Service Categories have been introduced including Job Search Assistance, Job Placement Assistance, and Customized Employment Services, that it will be a challenge to train staff and vendors to separate generic Job Development activities into the three	RSA concurs that the RSA-2 form will require software system modifications and training for VR agency, CRP and vendor staff to learn the differences between each of the categories.

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	discrete categories.	