

OMB 83-1 SUPPORTING STATEMENT

Case Service Report (RSA-911)

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The data comprising the Case Service Report (RSA-911) under this information collection request (ICR) are mandated by the Rehabilitation Act of 1973 (the Act), as amended by title IV of the Workforce Innovation and Opportunity Act (WIOA). Specifically, sections 101(a)(10) and 607 of the Act contain data reporting requirements under the Vocational Rehabilitation (VR) program and the Supported Employment program, respectively. WIOA amends these sections to require States to report additional data describing the individuals served and the services provided through these programs (see Attachment A).

In addition, section 116 of title I of WIOA requires the reporting of data needed to calculate the performance accountability measures for core programs of the public workforce development system, including the VR program, and barriers to employment for individuals served through the system. The RSA-911 under this ICR includes the joint data collection elements required by section 116(d) of WIOA (29 U.S.C. §3141(d)) and jointly developed by the Departments of Education and Labor. The joint performance indicators reported by States will be used by both the Departments of Education and Labor to determine State and program levels of performance.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The Rehabilitation Services Administration (RSA) uses the data collected through the RSA-911 to describe the performance of the VR and Supported Employment programs in the Annual Report to the Congress and the President as required by sections 13 and 101(a)(10) of the Act. RSA also uses these data to assess the performance of the VR program through the calculation of evaluation standards and performance indicators as required by section 106 of the Act, which must be consistent with the common performance accountability measures established under section 116 of title I of WIOA for the core programs of the workforce development system.

In addition, RSA uses data reported through this data collection to support its other responsibilities under the Act. Section 14(a) of the Act calls for the evaluation of programs authorized under the Act, as well as an assessment of the programs' effectiveness in relation to cost. Many of these evaluation studies have utilized RSA-911 data. RSA also uses data

captured through the RSA-911 during the conduct of both the annual review and periodic onsite monitoring of VR agencies required by section 107 of the Act to examine the effectiveness of program performance.

Other important management activities, such as the provision of technical assistance, program planning, and budget preparation and development, are greatly enhanced through the use of RSA-911 data. In addition, RSA uses RSA-911 data in the exchange of data under a data sharing agreement with the Social Security Administration as required by section 131 of the Act. Finally, the RSA-911 is considered to be one of the most robust databases in describing the demographics of the disabled population in the country and as such is used widely by researchers' disability-related analyses and reports.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The RSA-911 is an electronic text file that is created by extracting selected data elements from VR agency case management and/or financial management data systems. VR agencies submit comma-delimited text files to the Department of Education via RSA's website, <https://www.rsa.ed.gov>. The transmission of the data file to RSA poses minimal processing burden on VR agencies.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.

The RSA-911 is the only RSA data collection that requires data to be reported for each individual that applies for or receives VR and/or supported employment services. These data are not otherwise collected by the Department of Education. In addition, the data collected through the RSA-911 will be used to calculate the VR program's levels of performance under the common performance accountability system required by section 116 of title I of WIOA, thereby minimizing burden on the States. Therefore, there is no duplication of data elements with any other reporting systems.

At this time, RSA uses the data reported through the Cumulative Caseload Report (RSA-113), the only source of quarterly VR program data, for program management purposes and, to support budget requests for the VR program. However, RSA intends to reduce the reporting burden on the States by discontinuing use of the RSA-113 when VR agencies are able to report similar data through the RSA-911 on a quarterly basis. Also, RSA anticipates that the collection of RSA-911 data on a quarterly basis will enable a reduction of reporting burden for the Annual Vocational Rehabilitation Program/Cost Report (RSA-2) for the VR and Supported Employment programs. Shortly after the implementation of the RSA-911, RSA intends to eliminate the RSA-2 Schedule III, Number of Individuals Served and Purchased Service Expenditures by Service

Category. The Department of Education will provide guidance to VR agencies regarding these reporting changes.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This data collection does not have a significant impact on small businesses or small entities. However, grantees must secure the necessary data from all service providers and contractors, as applicable, to incorporate into required reporting formats.

6. Describe the consequences to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

As a result of the amendments to the Act made by title IV of WIOA, the RSA-911, which is currently approved as an annual data collection, must be collected quarterly. Without this data collection on a quarterly basis, RSA would be unable to comply with section 116 of title I of WIOA, which mandates the use of new common performance indicators (some of which are based on data that must be collected for specific quarters) to assess the performance of the core programs comprising the workforce development system, including the VR program.

In addition, the VR program, which is one of the six core programs of the workforce development system, and the Supported Employment program operate and are funded on a different cycle from the other five core programs. Both the VR program and the Supported Employment program operate and are funded on a Federal fiscal year (October 1st through September 30th) basis pursuant to sections 110, 111, and 603 of the Act, whereas the other five core programs of the workforce development system operate and are funded on a Program Year basis (July 1st through June 30th). The other five core programs are the Adult, Dislocated Worker, and Youth programs authorized under title I of WIOA and administered by the Department of Labor; the Adult Education and Family Literacy Act program authorized under title II of WIOA and administered by the Department of Education; and the Employment Service program authorized under the Wagner-Peyser Act, as amended by title III of WIOA and administered by the Department of Labor. Because the WIOA program year and the Federal fiscal year are offset by one quarter (July 1 through September 30), RSA needs quarterly data submissions so that it can draw comparisons between both program and fiscal years. If the RSA-911 was collected less frequently than quarterly, it would be incompatible with the performance reporting template required under title I of WIOA jointly developed by the Departments of Education and Labor and published for comment in the Federal Register on April 27, 2016 (<https://www.gpo.gov/fdsys/pkg/FR-2016-04-27/pdf/2016-09807.pdf>) and would necessitate that VR agencies track and report the same data using two different reporting calendars. As explained above, several of the performance indicators – particularly the three employment-related performance indicators – require data that are based on specific quarters after a participant exits a core program. Therefore, by RSA revising the RSA-911 report to a quarterly reporting system, the burden imposed on States is minimized significantly.

Finally, RSA would be able to use data reported quarterly through the RSA-911 to better identify VR agencies that are performing poorly and to provide more timely technical assistance to address this performance.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- *Requiring respondents to report information to the agency more often than quarterly;*
- *Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *Requiring respondents to submit more than an original and two copies of any document;*
- *requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;*
- *In connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;*
- *Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- *That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*
- *Requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

There are no special circumstances that require the collection to be conducted as discussed in the bulleted items above.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On April 16, 2015, RSA published a Federal Register notice at 80 FR 21059 seeking public comment on the RSA-911 for 60 days ending on June 15, 2015. RSA received 101 comments in response to the Federal Register notice. A summary of the comments received and RSA's responses can be found in Appendix A in the comment section of ROCIS. Full comments are available at <https://www.regulations.gov>.

The RSA-911 under this ICR includes the joint data collection elements required by section 116(d) of WIOA (29 U.S.C. § 3141(d)) and contained in the Joint Performance ICR jointly developed by the Departments of Education and Labor. The corresponding joint regulations for these data collection requirements, including the primary performance indicators, were contained in a joint Notice of Proposed Rulemaking (NPRM). The joint NPRM was published on April 16, 2015 at 80 FR 20574 and is available at <https://federalregister.gov/a/2015-05528>. The comment period for the NPRM closed on June 15, 2015. The Departments of Education and Labor considered these comments when publishing the joint ICR for a 30-day comment period on April 27, 2016. The ICR is available at http://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201604-1205-008. The joint data elements included in this RSA-911 are consistent with those included in the most recent Joint Performance ICR.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

RSA will not provide any payments or gifts to respondents in connection with this data collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

This ICR does not contain assurances of confidentiality, as States are the respondents. This collection of information will collect personally identifiable information (PII) such as birthdates and social security numbers (SSNs). RSA's policy has always been to maintain the confidentiality of individual service record data. The SSN is used for the following:

1. Record control purposes to enable RSA to generate unduplicated data reports;
2. To enable the RSA-SSA Data Exchange in accordance with section 131 of the Act;
3. To facilitate the VR agency's ability to obtain UI wage data information required under WIOA.

Section 13 of the Act reinforces RSA's confidentiality requirement by expressly stating that the Commissioner of RSA is to assure that the identity of each person for whom information is supplied remains confidential.

The System of Records Notice (18-16-02) for the RSA-911 data collection was published in the Federal Register April 8, 2004. The link is: <http://www.ed.gov/notices/pai/pai-18-16-02.pdf>.

The Privacy Impact Assessment is at the following link:
http://www2.ed.gov/notices/pia/csr_041408.pdf.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no sensitive questions included in the data collection.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.*
- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83-I.*
- *Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should not be included in Item 14.*

Respondents in the RSA-911 system are the 80 VR agencies in the United States and its territories. In prior RSA-911 data collection supporting statements, 45 hours had been used. For 80 agencies the total burden hours computed to a national total of 3,600.

VR agencies must report new data required by section 101(a)(10)(C) of the Act, as amended by WIOA and the joint performance accountability requirements in section 116 of title I of WIOA through the RSA-911. In addition to new and/or revised data elements needed to comply with program-specific regulations, the final RSA-911 includes new data elements and definitions necessary to provide alignment with the WIOA Joint Participant Individual Record Layout (PIRL) and the Statewide Performance Report. This ICR for the RSA-911 reflects the increase in burden due to these new requirements. Finally, the revised RSA-911 includes the estimated burden hours for both collection and submission of the data. Previous burden estimates were based only on the time needed to prepare and submit the RSA-911. In addition, we have changed the method used to estimate the time needed to collect the data in the NPRM from a

total of 15 minutes per vocational rehabilitation counselor to one minute for each new data element in the form.

Data Collection:

For the first year of data collection, VR agencies will incur greater data collection burden than in subsequent years in order to obtain data on current participants who are still receiving VR services at the start of program year 2017 (July 1, 2017) and will be counted and tracked in accordance with the WIOA performance requirements set forth in section 116 of title I of WIOA. Based on data reported through the RSA-113 for FY 2015 and assuming one minute per data element, RSA estimates that, in the first data collection, State VR agencies will incur a total of about 800,000 hours of additional burden to collect new data for VR consumers (an average of 10,000 per agency).

Based on an assessment of all new WIOA data elements to be reported through the RSA-911, RSA estimates that approximately 64 percent of the increase in data burden is related to new VR and Supported Employment program requirements, while 36 percent is related to the joint performance accountability system requirements. Taking into consideration the proportion of new VR specific data elements to all new data elements required by WIOA (64 percent), we estimate that VR agencies will spend a total of approximately 512,000 hours collecting the new VR-specific data elements, or an average of 6,400 hours per VR agency in the first year of data collection. We further estimate that vocational rehabilitation counselors will complete 50 percent of data collection activities associated with new VR-specific data elements, and that VR Rehabilitation Technicians or similar personnel will complete the remaining 50 percent.

Using an hourly compensation rate of \$36.66 for VR counselors (wage rate based on State-employed Rehabilitation counselors), the estimated cost for 50 percent of the data collection burden (256,000hours) is \$9,384,960. Using an hourly compensation rate of \$28.29 for VR Rehabilitation Assistants or equivalent positions (wage rate based on State-employed Social and Human Service Assistants plus the loaded wage factor), the estimated cost for the remaining 50 percent of the data collection burden is \$7,242,240. Consequently, we estimate that the total additional cost for all 80 VR agencies to collect the new VR program-specific data elements to be \$16,627,200, or an average of \$207,840 per VR agency for the initial year of data collection. For the second and subsequent years of data collection under these final regulations, we estimate that in total VR agencies will incur about 200,000 hours of additional burden per year under WIOA. For new VR-specific data elements, we estimate 128,000 hours, or an average of 1,600 hours of additional annual burden per VR agency, in the second and subsequent years of data collection. Using the same strategy to calculate the costs for the first year of data collection, we estimate that the total additional annual cost for all 80 VR agencies to collect the new VR program-specific data elements to be \$4,156,800, or an average of \$51,960 per VR agency for the second and subsequent years of data collection. The remaining portion of the burden for new data collection attributed to the performance accountability system requirements in section 116 of title I of WIOA will be reported under the Joint Performance ICR.

Data Reporting:

We estimate an average of 70 additional burden hours per year, or a total of 120 hours per year (30 hours per quarter), for each VR agency to submit the RSA-911 data file of open case service records on a quarterly basis. As a result, the estimated total number of hours needed for the submission of the data file for 80 agencies will increase from 4,000 to 9,600 hours, resulting in an increase of 5,600 hours. Using an average hourly compensation rate of \$57.02 (wages based on State-employed Database Administrators), the estimated additional cost for all 80 VR agencies to submit the RSA-911 data file of open case service records on a quarterly basis is \$319,312. The estimated additional cost per VR agency is \$3,991.

The total additional VR-specific burden hours for both collection and submission of required data will be 6,470 hours per VR agency (6,400 data collection hours and 70 data submission hours), or a total of 517,600 hours for all 80 VR agencies. The estimated total additional VR program-specific cost for both collection and submission per VR agency is \$211,831, with a total additional burden cost of \$16,946,512 for all 80 VR agencies.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- *The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.*
- *If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.*
- *Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices.*

There will be one-time start-up costs for each respondent to implement the revised RSA-911. These costs include: enhancements to data collection systems to adhere to WIOA requirements,

software licensing or user fees, and training staff on data collection procedures. Since we estimate that approximately 64 percent of the total new data collection is attributable to new requirements in Title I of the Rehabilitation Act (Title IV of WIOA) and 36 percent to new data collection requirements for joint performance accountability under section 116 of Title I of WIOA, we have also prorated the estimated burden for the start-up activities as described below.

All 80 State VR agencies will incur burden for start-up activities associated with modifying their case management systems (CMS) to collect and report new data required by WIOA and its implementing regulations through the RSA-911, including data to support reporting requirements under titles I and VI of the Rehabilitation Act (title IV of WIOA) and the primary indicators of performance and other related performance requirements under section 116 of title I of WIOA. However, the burden for making such changes will vary among the 80 VR agencies dependent upon the size, sophistication of their information technology systems, and whether the agency contracts for outside assistance for developing and maintaining their CMS. We estimate that each of the 80 State VR agencies will require computer systems analysts for the task of modifying and reprogramming their CMS. However, because the level of effort will vary, the burden estimates for this work by Computer Systems Analysts has been broken down to reflect this complexity.

Roughly 30 of the 80 VR agencies use case management and reporting systems purchased from software providers who are responsible for maintaining and updating software. We estimate that each of these 30 VR agencies will require two Computer Systems Analysts to spend 150 hours integrating the software changes into their own State systems, resulting in 300 hours per agency, or a total of 9,000 hours in additional burden for all 30 agencies. Of the remaining 50 VR agencies that do not have agreements with a software provider to maintain and update software, five of these agencies are categorized as large agencies (with more than 5,000 employment outcomes) and 45 of these agencies are categorized as small to medium-sized agencies (with fewer than 1,000 employment outcomes, and between 1,000 and 5,000 employment outcomes, respectively). We estimate the five large agencies will require five computer systems analysts to spend 1,000 hours each to maintain and update agency software (5,000 hours per agency), for a total of 25,000 hours. We estimate the 45 small to medium-sized agencies will require two computer systems analysts to spend 1,000 hours each to maintain and update the software (2,000 hours per agency), for a total of 90,000 hours in order to make the necessary software changes. This results in a total of 115,000 hours for the 50 agencies without outside vendor support to maintain and update their information systems. Combining this burden with the 9,000 hours for the 30 agencies that we estimate will only have to integrate the software modifications provided through their vendor contract results in a total burden estimate of 124,000 hours for all 80 VR agencies. Prorating these total burden hours at 64 percent results in an estimated total of 79,360 hours. Using an hourly compensation rate of \$56.17 (based on data from the Bureau of Labor Statistics for State-employed Computer Systems Analysts and a loaded wage factor of 1.57), the prorated estimated cost for all 80 VR agencies is \$4,457,651.

The table below provides an estimate of the burden hours and costs for reconfiguring the case management systems for those who effect the changes in-house and for those agencies who contract with others to make the programming changes necessary. Before the effective date of

the revised RSA-911, some of the approximately 40 agencies may purchase case management software systems.

The costs to the VR agencies to effect the programming changes necessary will vary considerably based on many factors including availability of State IT programmers and contracting costs which would vary widely based on location. The following estimates are high to account for any possible unforeseen costs and hours.

<u>First Year Costs of Reconfiguring Software Systems</u>	<u>Number of Agencies</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total Cost</u>
Using in-house staff	50	115,000	\$56.17	\$6,459,550
Using contractors	30	9,000	\$56.17	\$505,530
Total	80	124,000		\$6,965,080
Prorated total burden at (64%)		79,360		\$4,457,651

In addition to maintaining and updating software, 48 agencies that utilize vendor supplied case management software will incur additional software licensing or user fees. Using an average cost of \$700 per user annually, we estimate a total cost for the approximate 6,600 users in States served by vendor systems of \$4,620,000. However, we estimate that only 20 percent of the increase in such costs, or \$924,000, is related to WIOA requirements. Applying the 64 percent proration factor to this estimated amount, the 48 agencies will incur an additional \$591,360 in licensing or user fees.

Finally, the 80 VR agencies will be required to train VR Counselors on the new and modified data elements that need to be collected and entered into their case management system. We estimate that each VR agency has an average of 62 VR Counselors and that each VR Counselor will require 8 hours of training. Using an hourly compensation rate of \$35.09 per VR Counselor (based on 2015 data from the Bureau of Labor Statistics and a loaded wage factor of 1.57), the estimated cost for VR Counselors to receive such training is \$1,392,371 for all 80 agencies, or \$17,405 per agency. In addition, we estimate that development of the training materials and methodologies will require 1 Staff Trainer 8 hours per VR agency. Using the Social and Community Service Manager hourly compensation rate (\$54.21) as a proxy for the Staff Trainer, the estimated cost for development of the training is \$34,694 for all 80 agencies. The total estimated cost for development of the training and VR Counselor participation in the training is \$1,427,066 for all 80 VR agencies. Since we are estimating that approximately 64 percent of the burden is related to joint performance accountability, the estimated total cost associated is \$913,322, or \$11,417 per VR agency.

Summing all of the prorated estimated start-up costs associated with this data collection for all 80 State VR agency respondents, results in a total cost burden of \$5,962,333, or \$74,529 per State VR agency.

The burden on the State and territory VR agencies for programming the redesigned RSA-911 changes to their case management systems will vary widely because agencies themselves range in size and IT sophistication. Roughly half of the 80 VR agencies use case management systems that were purchased from software providers who will be responsible for maintaining their system software with the latest form updates. The remaining VR agencies have developed their own case management systems for which changes will be made by their IT staff or outside contractors. Approximately, half the agencies would make the changes in house and half would contract out for the changes to be made.

14. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

At the Federal level, RSA will develop its performance accountability and data analysis capacity using new staff positions. We estimate that it will take two full-time Data Management Specialist positions, one at a GS-13 Step 5 and one at a GS-14 Step 5, to complete the necessary database programming requirements. With an hourly compensation rate of \$64.71 for the GS-13 position and \$76.48 for the GS-14 position, the total VR cost for software development is \$293,675. Since we are estimating that approximately 64 percent of the burden related to performance accountability is VR-specific burden, the estimated cost will be \$187,952. We believe that these data collection and reporting costs are outweighed by the benefits to the VR program because the new information to be reported and having access to more timely information on individuals currently participating in the VR program will better enable the Department of Education and its Federal partners to assess the performance of the program and monitor the implementation of WIOA, particularly as it relates to key policy changes, such as the provision of pre-employment transition services and the integration of the VR program in the workforce development system.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

The implementation of WIOA required numerous changes to the RSA-911 data elements. Major changes include, but are not limited to:

- A. Adding a unique identifier for all applicants or individuals receiving services;
- B. Adding data elements required to track individuals receiving pre-employment transition services;
- C. A new taxonomy for capturing educational attainment at application and ongoing educational services;
- D. Adding required barriers to employment data elements;
- E. An extended section on WIOA program involvement;
- F. A new section on reporting measurable skill gains;

- G. New date fields and more detailed code descriptions;
- H. A new section to differentiate data elements required at attainment of employment outcome from data elements required at exit from program;
- I. Categorization of VR and SE services in accordance with the WIOA definitions for training and career services; and
- J. Adding post-exit data elements necessary for reporting performance measures.

Additional changes include, but are not limited to:

- A. Medical insurance information has been revised to reflect the Affordable Care Act;
- B. FIPS County Code of the individual's residence has been added;
- C. Codes within several data elements have been revised to provide additional clarification regarding what is to be reported; and
- D. The instructions for reporting services provided and costs for purchased services have been revised to clarify what costs are to be reported.

The changes made in the RSA-911 are in response to data required by section 101(a)(10)(C) of the Act, as amended by WIOA, and by section 116 of WIOA. When required, RSA has also included additional clarification to improve the consistency of the data elements being reported.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

VR agencies will submit a comma delimited data file through an RSA-911 data portal via RSA's website, <https://rsa.ed.gov>. RSA-911 data must be submitted to RSA on a quarterly basis, no later than 45 days after the end of each quarter in accordance with the following schedule:

Reporting Dates		
Quarter	Reporting Period	Report Due Date
1	July 1 – September 30	November 15
2	October 1 – December 31	February 15
3	January 1 – March 31	May 15
4	April 1 – June 30	August 15

Tabulations are generated to describe program-related characteristics by (a) state VR agency and by (b) specific target groups (e.g., the type of disability, race, gender, etc.). There are 80 state VR agencies and a large number of target groups by which the data can be displayed, by type of closure (e.g., with or without an employment outcome).

The analysis of the data will provide demographics, relationships between variables, and program outcomes to assist in understanding and monitoring VR programs. Summaries of

selected characteristics for all persons served including those with significant disabilities are published in the RSA Annual Report to Congress.

RSA will also aggregate the relevant RSA-911 data elements to develop the VR agency portion of the WIOA Annual Statewide Performance Report. The WIOA Annual Statewide Performance Report Specifications details the common data elements and technical specifications necessary for calculation of the State and Local Area performance report elements that will be used in reporting across all core programs.

The data are also used for preparing monitoring tables, determining performance, and for researchers who conduct analyses. Data from the RSA-911 without SSNs or PII is also transferred to the RSA Management Information System which uses the data to generate tables for the public and for RSA's use.

The timeline for implementation is included in the table below:

Implementation Timeline	
Date(s)	Description
June 2016	Revised RSA-911 enters clearance
June 2016	Revised RSA-911 published in the Federal Register for 30-day comment period
July 2016	Revised RSA-911 form approval expected
August 2016 – June 2017	State agencies update and test systems to address new/revised data elements
July 2017	Agencies collect new data elements for program year 2017
November 2017	Agencies submit first quarterly data report to RSA

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

RSA is not seeking approval not to display the expiration date for this data collection.

18. Explain each exception to the certification statement identified in the Certification for Paperwork Reduction Act

There are no exceptions to the certification statement identified in Item 20 of OMB Form 83-1.