

RSA appreciates the comments provided by one Vocational Rehabilitation agency. The commenter appreciated RSA's attempts to strengthen the current report by streamlining the data collection process for State Vocational Rehabilitation Agencies. The commenter indicated they supported the RSA-2 revisions.

The commenter noted four concerns. First, the commenter stated there are discrepancies in the reporting instructions that raise concerns regarding RSA-2 data consistency and comparability across all of RSA's reporting forms for the Vocational Rehabilitation (VR) program. The commenter indicated that RSA should compare the data elements across all required reports (RSA-2, SF-425, RSA-911, RSA-113) for comparability and consistency between data elements. Additionally, the commenter requested RSA provide States with assistance in understanding the data components to ensure consistency across the various reports.

RSA Response: We have made the changes in this RSA-2, in part, to better align the RSA-2 data elements with other VR data collection instruments and regulatory requirements. For example, RSA added reporting categories under services to groups expenditures in order align the categories with changes made to the Rehabilitation Action by the Workforce Innovation and Opportunity Act as implemented at 34 CFR 361 and 363.

Second, the commenter noted that five additional services are broken out in Schedule I: Telecommunication Systems, Special Services to Provide Non-visual Access to Information, Technical Assistance to Businesses, Transition Services to Youth and Students, and Support for Advanced Training. For many agencies, the combined data for these data elements are being reported through "all other services to groups" on the current RSA-2 report. The commenter expressed concern that States may not have been tracking these services separately since 10/01/2016, the beginning date for the RSA-2 form period of reporting.

RSA Response: RSA appreciates the commenters concern and will work with agencies as they transition to the new reporting format.

Third, the commenter noted that RSA previously used the labor hour data reported in Schedule II for the distribution of federal funds for training and manpower development. Since the In-Service training grant is no longer funded, the commenter requested clarification regarding how labor hour data will be used.

RSA Response: The labor hour data is primarily used in response to Congressional requests, to analyze the labor hour trends for an agency when conducting monitoring, and for research purposes.

Fourth, the commenter noted that the RSA-2 excludes the pre-employment transition services, as defined in 34 CFR 361.48, which are required to be reported on the RSA-911. The commenter asked where States should report purchased pre-employment transition services.

RSA Response: On this version of the RSA-2, respondents will report the amount of purchased pre-employment transition services through the Schedule III Service Category – Other.

RSA appreciates the commenter noting a typographical error. Under the instructions for Schedule I.3, Services to Groups Expenditures, 3.G Transition Services to Youth and Students the reference included is 34 CFR 361.29 (a)(7). The correct reference citation is 34 CFR 361.49(a)(7) and this change has been incorporated into the final RSA-2 form.