

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 revisions to the Case Service Report (RSA-911) proposed in this information collection request (ICR) would remove unnecessary and duplicative data elements, streamline the process for reporting public support and medical insurance coverage, and add “Apprenticeship Training and other Work Based Learning Experience” as a training service under the Vocational Rehabilitation (VR) program.

The data to be collected via the RSA-911, as proposed in this ICR, are mandated by the Rehabilitation Act of 1973 (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 VR program and the Supported Employment program, respectively. WIOA amended these sections to require States to report additional data describing the individuals served and the services provided through these programs.

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 proposed under this ICR continues to include the joint data collection elements required by section 116(d) of WIOA (29 U.S.C. § 3141(d)) and the “Workforce Innovation and Opportunity Act Common Performance Reporting” information collection (OMB 1205-0526) jointly developed by the U.S. Departments of Education and Labor (Departments). The joint performance indicators reported by States will continue to be used by both Departments 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 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 used 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 in their 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 otherwise are not collected by the U.S. 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 WIOA, thereby minimizing burden on the States. Therefore, there is no duplication of data elements with any other reporting systems.

Historically, RSA has used the data reported through the Cumulative Caseload Report (RSA-113) for program management purposes and to support budget requests for the VR

program. However, RSA incorporated those data elements into the existing RSA-911. In so doing, RSA has reduced the reporting burden on the States by discontinuing use of the RSA-113 beginning in Federal fiscal year 2019 since all VR agencies have reported one program year of data under the current RSA-911. 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. Following the implementation of this proposed 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.

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 1 through September 30) 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 1 through June 30). The other five core programs are the Adult, Dislocated Worker, and Youth programs authorized under title I of WIOA and administered by the U.S. Department of Labor; the Adult Education and Family Literacy Act program authorized under title II of WIOA and administered by the U.S. 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 U.S. 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 Federal fiscal years to satisfy statutory reporting requirements. If the RSA-911 were collected less frequently than quarterly, it would be incompatible with the performance reporting template required under title I of WIOA and jointly developed by the Departments.

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 June 22, 2017, the U.S. Department of Education published a *Federal Register* notice at 82 FR 28431, through which it sought public comment on the Department's regulations by September 20, 2017. RSA received 12 comments in response to that *Federal Register* notice related to the RSA-911. VR agencies requested that RSA reduce the burden associated with reporting post-exit data, as most post-exit data collected is not required for calculating information reported in the WIOA Annual Report. Agencies also asked RSA to remove redundancy and clarify definitions related to education and training elements. Finally, agencies asked RSA to remove the data elements related to the amount of monthly public support at exit.

RSA used these comments and other comments and questions received from VR agencies using the current RSA-911 to propose changes to the data collection, which were published in the Federal Register for 60-day public comment on October 1, 2018 (83 FR 49372). The manner in which RSA addressed the comments in this proposed RSA-911 is described in response to No. 15 of this supporting statement. A 30 day notice will be published.

For this request to use the revised RSA-911 under the approved 1820-0508 expiring in August 2019, RSA has published this 30-day Federal Register Notice seeking public comments on this version of the proposed RSA-911 data elements.

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 ICR proposes to collect personal information, 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. Enable the RSA-SSA Data Exchange in accordance with Section 131 of the Act;
3. Facilitate the VR agency's ability to obtain Unemployment Insurance wage data information required under WIOA.

Section 13 of the Act reinforces RSA's confidentiality requirement by expressly stating that the RSA Commissioner 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 proposed 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.*

The annual burden for this information collection, specific to the VR program, is 26,958 hours for collection and 7,488 hours for reporting totaling 34,446 hours or 442 hours per VR agency. Respondents to the RSA-911 system are the 78 VR agencies in the United States and its territories. The RSA-911 includes data collection elements required by Section 101(a)(10)(C) of the Act, as amended by WIOA and the joint performance accountability requirements in Section 116 of WIOA. The RSA-911 includes data elements and definitions necessary to provide alignment with the WIOA Joint Participant Individual Record Layout (PIRL) and the Statewide Performance Report. The reporting burden estimates below represent only the costs associated with the VR specific reporting requirements. The remaining portion of the burden for data collection attributed to the performance accountability system requirements in Section 116 of WIOA is reported under the Joint Performance ICR.

Data Collection:

Using a per data element calculation basis, RSA estimates that the proposed changes to the RSA-911 will result in 82 percent (258 data elements) of the data burden being related to VR and Supported Employment program requirements, while 18 percent (55 data elements) of the burden is related to the joint performance accountability system requirements. The remaining portion of the burden for data collection attributed to the performance accountability system requirements in Section 116 of title I of WIOA is reported under the Joint Performance ICR.

For program year (PY) 2017, VR agencies reported a total of 1,232,833 (not null) data elements under the current RSA-911. Assuming two minutes per data element, RSA estimated that State VR agencies would incur a total of 41,094 hours of burden to collect the current RSA-911 data. RSA increased the time per data element from one minute to two minutes in response to public

comments related to the burden estimates. The total number of data elements in the proposed RSA-911 is 313, which represents a 20 percent reduction in the number of data elements when compared to the current RSA-911 (393 data elements). Therefore, RSA reduced the expected burden for the proposed RSA-911 by 20 percent to 32,875 hours. The portion of the total allocable to the VR program specific data elements is 82 percent or 26,958 hours. Therefore, RSA estimates the total number of burden hours to collect the proposed RSA-911 data is approximately 346 hours per agency per year.

We further estimate that VR counselors will complete 50 percent of data collection activities associated with the program 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 (13,479hours) is \$494,140. 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 \$381,321. Consequently, we estimate that the total cost for all 78 VR agencies to collect the proposed VR program-specific data elements to be \$875,461, or an average of \$11,224 per VR agency per year. The estimated cost for the collection of the proposed RSA-911 data elements is proportionately less than the current RSA-911 due to the 20 percent reduction in the number of data elements.

Data Reporting:

With a net reduction of 80 data elements (20 percent), we estimate that the number of hours needed by each VR agency to submit a quarterly report will decrease from 30 to 24 and the total annual reporting burden will decrease from 120 hours to 96 hours. As a result, the estimated total number of hours needed for the submission of the data file for 78 agencies will decrease from 9,360 hours to 7,488, resulting in a decrease of 1,872 hours. Using an average hourly compensation rate of \$57.72 (based on data from the Bureau of Labor Statistics for State-employed Database Administrators and a loaded wage factor of 1.57), the estimated total cost for all 78 VR agencies to submit the RSA-911 data file of open case service records on an annual basis is \$432,207, representing an annual savings of \$108,052. The estimated cost per VR agency is \$5,541, with a savings of \$1,385.

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.*

All 78 State VR agencies will incur burden for activities associated with modifying their case management systems (CMS) to reflect the changes in the RSA-911. However, the burden for making such changes will vary among the 78 VR agencies, dependent upon the 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 78 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 55 of the 78 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 55 VR agencies will require one computer systems analyst to spend 40 hours integrating the software changes into their own State systems, resulting in 40 hours per agency, or a total of 2,200 hours in additional burden for all 55 agencies. Of the remaining 23 VR agencies that do not have agreements with a software provider to maintain and update software, we estimate that each agency will require 150 hours of staff time from a computer systems analyst to incorporate the changes into the system. This results in a total of 3,450 hours for the 23 agencies without outside vendor support to maintain and update their information systems. Combining this burden with the 2,200 hours for the 55 agencies that we estimate will only have to integrate the software modifications provided through their vendor contract results in a total burden estimate of 5,650 hours for all 78 VR agencies. Using an hourly compensation rate of \$56.91 (based on data from the Bureau of Labor Statistics for State-employed Computer Systems Analysts and a loaded wage factor of 1.57), the estimated cost for all 78 VR agencies is \$321,542.

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

The costs to the VR agencies to implement the programming changes necessary will vary considerably based on many factors including availability of State IT programmers and contracting costs that 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	23	3,450	\$56.91	\$196,340
Using contractors	55	2,200	\$56.91	\$125,202
Total	78	5,650		\$321,542

Since 82 percent of the proposed RSA-911 data elements are specific to the VR program data elements, we used this as the basis for estimating the portion of the burden associated with the proposed revisions. The estimated total cost associated is \$263,664.

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 existing staff positions. We estimate that it will take 150 hours of time from a GS-12 Step 5 Data Management Specialist position and 150 hours from one GS-14 Step 5 Information Technology Specialist, to complete the necessary database programming requirements. With an hourly compensation rate of \$44.47 for the GS-12 position and \$62.50 for the GS-14 position, the total VR cost for software development is \$16,046.

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

There is a program decrease in reporting burden hours of 1,872 hours per VR agency. There is a program change due to agency discretion resulting in an estimated startup cost of \$16,046 to the Department. The VR agencies will experience an estimated startup cost of \$263,664 to make necessary changes to case management systems.

Major program changes include, but are not limited to:

- A. Removing unnecessary post-exit data elements;
- B. Removing duplicative education data elements;
- C. Removing duplicative employment outcome elements;

- D. Removing the requirement to report comparable benefits for pre-employment transition services;
- E. Streamlining process for reporting public support and medical insurance coverage at application and exit;
- F. Removing unnecessary career, training, and other services data elements for reporting title VI expenditures;
- G. Adding “Apprenticeship Training and other Work Based Learning Experience” as a training service.

VR agencies serving individuals who are blind and visually impaired and VR agencies serving all other individuals with disabilities in two States combined between 2016 and 2018, resulting in a reduction in the number of agencies required to report RSA-911 to 78. The total burden and responses is 34,446 hours and 78 responses.

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 Table

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 78 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 personal information 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:

Revised Implementation Timeline Table

Date(s)	Description
July 2018	Revised RSA-911 enters clearance
October 1, 2018	Revised RSA-911 published in the Federal Register for 60-day comment period
January 2019	RSA responds to comments
February 2019	Revised RSA-911 enters clearance and is published in the Federal Register for 30-day comment period
March 2019	Revised RSA-911 approval expected
March 2019–June 2019	State agencies update case management systems and test systems
July 1, 2019	Agencies implement new RSA-911 data collection for PY 2019
November 15, 2019	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.