

**Information Collection Request for the Independent Living Services For Older Individuals
Who Are Blind (OIB) Program Annual Performance Report (APR)
(RSA-7-OB)**

Summary of Public Comments and Responses

U.S. Department of Education
Office of Special Education and Rehabilitative Services
Rehabilitation Services Administration

The U.S. Department of Education (Department) appreciates each stakeholder's suggestions and comments on this Information Collection Request (ICR) for the RSA-7-OB, published in the *Federal Register* on September 18, 2025. RSA received ten comments on various aspects of the proposed revisions to the RSA-7-OB.

RSA categorized the comments into general topics that follow the structure of the RSA-7-OB. Similar comments are summarized together, followed by a response to each summary of comments.

Part I – Funding Sources and Expenditures

Comment Summary: A commenter requested clarification on where to report voluntary participant contributions to the OIB program.

Department Response: Voluntary participant contributions may be reported in A9 and the instructions have been updated to clarify this.

Part II – Program Staffing

Comment Summary: RSA received 10 comments related to Program Staffing.

- One commenter recommended not deleting the questions in II, A related to FTEs through contracts or subgrants.
- One commenter supported the simplification of reporting on full-time equivalent staff in II, A.
- Four commenters requested removal of questions in II, B related to numbers of employees with disabilities.
- Two commenters requested removal of the question in II, B related to employee age.
- One commenter recommended that RSA provide clear guidance to grantees about what data may be collected and shared in aggregate form and how to safeguard the privacy of employees when there is concern about the data and their use.
- One commenter suggested that clarifying the language and offering examples of administrative and direct costs in the instructions would improve accuracy.

Department Response: The data collected via the RSA-7-OB are relegated to the provisions outlined in Section 752(h)(2) of the Rehabilitation Act of 1973, as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA). Collection of data regarding employment through contracts or subgrants is not required by this section. Collection of data on employees

with disabilities and general questions regarding employee age are required by the statute. RSA and the OIB Technical Assistance Center (www.oib-tac.org) provide ongoing guidance and technical assistance on all aspects of the RSA-7-OB, including data collection and information on administrative and direct costs.

Part III – Data on Individuals Served

Comment Summary: We received 16 comments related to Data on Individuals Served.

- Six commenters expressed concerns that excluding questions in III, A that distinguishes between consumers enrolled in the prior year versus the current year may not capture the number of new consumers moving through the program.
- One commenter expressed concerns that program participants may not identify as male or female.
- One commenter acknowledged administrative burden. However, the commenter disagrees with the removal of data points G, H, I, and J.
- One commenter requested reinstatement of question H, related to other health conditions / disabilities.
- Three commenters requested reinstatement of question I, related to type of residence.
- Two commenters requested reinstatement of question J related to referral source.
- One commenter reported approval of the removal of question H related to other impairments.
- One commenter requested additional built-in checks in order to avoid unintended duplication.

Department Response: Regarding Individuals Served, RSA restored the questions in Section A that distinguish between consumers enrolled in the prior year versus the current year. Information from those two questions will help grantees fulfill their statutory requirement to, as appropriate, compare activities carried out in the preceding fiscal year with those carried out in the current fiscal year. RSA previously updated the question related to sex to comply with Executive Order 14168. RSA removed questions G, H, I and J because grantees are not statutorily required to report to RSA data collected by those questions. RSA continues to develop built-in checks where possible in order to maximize data accuracy.

Part IV – Types of Services Provided and Funds Expended

Comment Summary: We received three comments related to Types of Services Provided and Funds Expended.

- One commenter requested removal of the total expenditures from all sources of program funding, A1, B1, C1, D1, and E1.
- One commenter requested that additional language be added to the instructions that clarifies the need to count each direct service provided separately in the total amount of expenditures.
- One commenter requested clarification language that both IV, A,2 and 3 require unduplicated counts related to the number of participants who received vision exams / assessments or treatment to address vision loss.

Department Response: Questions A1, B1, C1, D1, and E1 cannot be removed because collection of those data is statutorily required. Regarding items A2 and A3, each item is an unduplicated count and RSA added language in the instructions to clarify this issue.

Part V – Program Performance Measures and Outcome Data

Comment Summary: We received seven comments related to Program Performance Measures and Outcome Data.

- One commenter noted that explicit definitions in this section would be helpful in promoting data consistency.
- One commenter requested that clarification be added in V,A and B, to ensure outcomes are reported upon completion of services and not at the end of the FFY.
- Three commenters requested the following annotation be included in instructions for V,C, “An individual who maintained, but did not improve their capabilities, may be reported here if the individual's goal was to prevent further decline in their capabilities.”
- Two commenters noted that questions in V,C1 and V,C2 appear to be reversed from the instructions and the report instrument.

Department Response: RSA added language to A – Assistive Technology Devices and Services and B – Independent Living in the instructions, to ensure reporting occurs upon completion of services and not only at the end of the FFY. RSA agrees with the commenter that program participants identified in V, C, who maintained but did not improve their capabilities should be reported if the individual's goal was to prevent further decline in their capabilities. RSA has revised the instructions accordingly. RSA ensured the instructions match the ICR.

Part VII – Narrative

Comment Summary: We received 17 comments related to the Narrative.

- Three commenters requested that the question related to the grantee's method of implementation be reinstated.
- One commenter expressed appreciation for the shift from implementation methods to impact in VI, A, and further suggested shorter prompts related to what has changed for program participants might make the data stronger.
- Six commenters requested that the question surrounding providing a narrative related to evaluation or satisfaction surveys be reinstated.
- Six commenters suggested that questions B. and C. related to community outreach and capacity building be combined.
- One commenter requested that a previous question related to program concerns and challenges be reinstated.

Department Response: To reduce administrative burden and to ensure adherence to only statutory requirements, RSA determined that separate questions related to evaluation and satisfaction surveys are not required by law. Consistent with the statute, questions related to community outreach and capacity building will remain separated.

Miscellaneous

Comment Summary: RSA received two additional comments that do not fit into the categories listed above.

- One commenter noted that the structure of the reporting instrument does not follow the natural flow of program activities, which places a burden on state staff to interpret questions and translate field work into federal reporting language.
- One commenter raised concerns that individuals experiencing vision loss are not receiving appropriate services and may not be aware of reporting requirements or deadlines for federal reporting.

Department Response: RSA is not revamping the RSA-7-OB at this time, but it will take the comments under advisement. Individuals who are responsible for the RSA-7-OB and who are experiencing vision loss, may contact RSA or the OIB Technical Assistance Center (www.oib-tac.org) to ensure compliance with reporting requirements and deadlines.