

APPENDIX A

Information Collection for Case Service Report (RSA-911)

Summary of Public Comments and Responses

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

I. Introduction

The U.S. Department of Education (Department) appreciates each stakeholder's suggestions and comments on this Information Collection Request (ICR) for the Rehabilitation Services Administration (RSA) Case Service Report (RSA-911), published in the *Federal Register* on May 21, 2026 (ED-2026-SCC-1717). RSA received 12 comments from four State Vocational Rehabilitation (VR) agencies and seven external stakeholders regarding the proposed revisions to the RSA-911. Below, the comments are categorized into two topics: General Comments and Specific Data Elements. The Department's "response" follows each comment summary.

II. Comments and Responses

A. General Comments

Comment: RSA received four comments on its proposal to remove the collection of comparable benefits from the RSA-911. All four commenters stated that identifying and using comparable benefits plays an integral role in service delivery under the VR program. One commenter noted that VR agencies must continue to identify comparable benefits available through other public programs, health insurance, and employee benefits because Federal regulations require this practice as part of plan development and service provision. Another commenter stated that if RSA removes the ability to report services provided through comparable benefits, the RSA-911 will exclude many services that serve as necessary components of an individualized plan for employment. This commenter asked RSA to clarify whether State VR agencies must continue to collect and document, for each case and each planned service, compliance with the requirement to use comparable benefits, even though they would no longer report those services to RSA. The commenter also asked whether a State VR agency may claim credit for *Measurable Skill Gains* and *Credential Attainment* when a participant receives a training service solely from a comparable benefit provider and the agency does not report that service in the RSA-911.

Two commenters supported removing comparable benefits from the RSA-911, but they requested additional clarifications. One commenter stated that State VR agencies gain more value for VR participants by seeking comparable benefits at the systems level, where they can build infrastructure and promote cross-sector supports and collaboration among public programs, thereby giving counselors clear pathways to access all available funding sources. Another commenter encouraged RSA to issue guidance explaining how State VR agencies can demonstrate compliance with 34 CFR 361.53 without collecting these data elements.

Department Response: RSA thanks these commenters for affirming the essential responsibilities State VR agencies have in seeking and obtaining comparable benefits and services. Section 101(a)(8) of the Rehabilitation Act describes the necessity of State VR agencies providing an assurance within their State Plans that, prior to providing an

accommodation or auxiliary aid or service or any VR service to an eligible individual, except those services specified in paragraph (5)(E) and in paragraphs (1) through (4) and (14) of section 103(a) of the Rehabilitation Act, the State VR agency will determine whether comparable services and benefits are available under any other program unless such a determination would interrupt or delay progress toward the employment goal of the individualized plan for employment (IPE), immediate job placement, or services to any individual at extreme medical risk. Section 102(b)(4)(E) of the Rehabilitation Act describes the terms and conditions of the IPE, including the responsibilities of the eligible individual and other entities in applying for and seeking comparable benefits as described in section 101(a)(8). Although the IPE must document all planned services, including those obtained through comparable benefits, section 101(a)(10) of the Rehabilitation Act does not mandate VR services provided through comparable benefits be included in the RSA-911.

Regarding *Measurable Skill Gains*, *Credentials Attainment*, and the appropriateness of including persons in these WIOA Performance Measures who have received training services through comparable benefits, State VR agencies must include in these measures any VR participant who is enrolled in training that leads to a credential or employment.

Comment: RSA received two comments concerning the overall burden of RSA-911 data collection. Both comments were appreciative of RSA's efforts to reduce and streamline the RSA-911 to that which is legally required and/or necessary. In addition, both comments suggested that RSA should seek further cuts where possible. One commenter suggested the elimination of 37 data elements concerned with the *Purchased Service Provider Type*, suggesting instead the reporting of this data on an annual aggregate basis.

Department Response: With the significant reductions proposed within this proposed extension with revisions, the remaining data required by the RSA-911 are aligned with the requirements of the Rehabilitation Act, the Workforce Innovation and Opportunity Act (WIOA), and the Build America, Buy America Act (BABAA). RSA is committed to collecting only the data it needs to administer the State VR Services and State Supported Employment Services programs and carry out the WIOA performance accountability provisions at the Federal level. Further, RSA does not expect VR counselors to be the sole staff persons responsible for RSA-911 data collection and reporting. RSA chose not to eliminate the 37 data elements concerning *Purchased Service Provider Type* because this information is required by section 101(a)(10)(E)(VI) of the Rehabilitation Act.

Comments: RSA received five comments concerning the collection of *Supported Employment* and *Customized Employment* VR service provision. Each of the commenters emphasized distinctions between *Supported Employment* and *Customized Employment*. These commenters suggested that targeted revisions to RSA-911 descriptions and coding would improve reporting consistency, provide clarity, and ultimately improve the differentiation of *Customized Employment* and *Supported Employment* within the RSA-911. Commenters requested revisions to specific VR service and data elements related to closure.

Department Response: RSA appreciates these comments aimed at better distinguishing between two VR services and outcomes. Within part B of this appendix, RSA addresses these comments as they pertain to specific RSA-911 data elements.

B. Specific Data Elements

Data Elements 261, 262 and 263

Comment: RSA received one comment concerning the definition of *Information and Referral Services* within data elements 261, 262, and 263, asking that RSA ensure that the reporting instructions are clear, aligned, and consistent.

Department Response: RSA thanks the commenter for pointing out that there are inconsistent definitions of *Information and Referral Services* provided in data elements 261, 262, and 263. RSA has corrected this inconsistency.

Data Element 21

Comment: One commenter suggested the elimination of most *Source of Referral* coding options (data element 21) in favor of a single option indicating if the individual was referred from an American Job Center.

Department Response: RSA does not consider this elimination as a significant reduction in burden and it would eliminate information used for monitoring, technical assistance, and inquiries.

Data Elements 254 and 255

Comment: Several commenters suggested that RSA revise the *Supported Employment* service definition to remove the phrase “including customized employment” or otherwise clarify the relationship between the *Supported Employment* and *Customized Employment* service definitions. These commenters stated that, in practice, individuals receiving *Customized Employment* services may appropriately be coded under both service categories, resulting in less distinct national data.

Department Response: RSA concurs and removed the phrase “including customized employment” from the definitions of data elements 254 and 255.

Data Elements 275 and 276

Comment: Several commenters suggested that RSA revise these data elements to more clearly define *Customized Employment* such that the focus is on Discovery, customized job development, building social capital, and negotiation with employers. Two commenters suggested changing the definition of these data elements to read: “Designed to meet the specific strengths, support needs, and work interests of the individual with a significant or most significant disability through Discovery, customized job development

and negotiation strategies that address the business needs of employers, and ongoing support services.”

Department Response: RSA concurs and adopted the definition of *Customized Employment* as proposed within data elements 275 and 276. RSA made clear in data element 279 that Title VI funds used for *Customized Employment* may only be used after the participant has been placed in an employment setting.

Data Element 354

Comment: Several commenters recommend maintaining a distinct exit category for individuals who exit after IPE in competitive integrated employment through *Customized Employment*. These commenters suggested that a separate exit category improves RSA’s ability to distinguish *Customized Employment* from broader Supported Employment, track *Customized Employment* implementation over time, and evaluate specific outcomes.

Department Response: Data element 354 designates the *Type of Exit*. Code 6 is “Individual exited after a signed IPE in competitive integrated employment or supported employment” is intended to be inclusive of all exits into competitive integrated employment. The inclusion of *Supported Employment* in the code description was meant to ensure that State VR agencies did not classify *Supported Employment* outcomes in competitive integrated employment elsewhere. RSA will clarify that State VR agencies are to use code 6 for all competitive integrated employment outcomes.

Data Element 356

Comment: Several commenters recommended that RSA maintain a distinct employment outcome category for *Customized Employment* in competitive integrated employment. These commenters suggested that separate employment outcome categories improve RSA’s ability to identify *Customized Employment*-specific employment outcomes.

Department Response: RSA concurs and added a coding option to data element 356.