

Dear Colleagues:

When the Rehabilitation Services Administration (RSA) receives questions from VR agencies related to the Case Service Report (RSA-911), it typically answers them individually. Occasionally, questions and answers have enough relevance to all VR agencies that RSA distributes them broadly. On June 9, 2023, RSA shared V10 of the Edit Checks that it is using for Program Year 2023 RSA-911 reporting and received some questions related to the Edit Checks.

This Dear Colleague Letter provides technical assistance related to Federal reporting requirements concerning “students with disabilities” and pre-employment transition services.

**Q1:** May a VR agency close the case of a “student with a disability” who has applied and been determined eligible for VR services if the individual still meets the definition of a “student with a disability” at the time of closure?

In most circumstances, the answer is “no.” VR agencies should make pre-employment transition services available to both potentially eligible and eligible “students with disabilities” until they no longer meet the definition of a “student with a disability.”

If a “student with a disability” is receiving pre-employment transition services under an individualized plan for employment (IPE) and determines that they are not interested in receiving other VR services – in support of a general projected postschool employment outcome or a specific employment goal identified on the IPE – the VR agency should not close the case and continue to provide pre-employment transition services to them so long as they are a “student with a disability.” The VR agency should only close the case when the “student with a disability” specifically requests case closure or the individual no longer meets the definition of a “student with a disability” and chooses to discontinue receiving VR services to meet a projected or specific employment outcome.

Note: Eligible “students with disabilities” may receive any other VR services needed to participate in pre-employment transition services as well as other VR services that are unrelated to pre-employment transition services to meet their identified employment goal. Section 102(b)(4)(A) of the Rehabilitation Act and 34 CFR 361.46(a)(1) make clear that the IPE for a student with a disability need only contain a “description of the student's projected postschool employment outcome,” as opposed to a description of a specific employment outcome. Because VR agencies develop initial IPEs for eligible students with disabilities that are more general in nature, they are able to provide additional supports and services to eligible students, as necessary, so they may benefit from pre-employment transition services and explore their career interests and, subsequently, refine the IPEs, through the amendment process under Section 102(b)(3)(E) of the Rehabilitation Act and 34 CFR 361.45(a)(6), to include a specific employment goal and the VR services necessary to achieve that goal, as appropriate.

**Q2:** If a potentially eligible student with a disability applies for VR services and the VR agency determines the individual ineligible, may the individual continue to receive pre-employment transition services as a potentially eligible student with a disability?

No, the VR agency may not consider an individual, who has been determined ineligible for VR services, a potentially eligible student with a disability for the purpose of providing pre-employment transition services.

**Q3:** In the quarter that the potentially eligible student with a disability becomes ineligible to receive pre-employment transition services (e.g., no longer meets the State’s definition of a “student with a disability”), does the VR agency report 0 in Data Element (DE) 22 for that quarter?

No, the below example outlines how VR agencies should report the provision of pre-employment transition services and other RSA-911 DEs over the course of four quarters.

- In Q1, the potentially eligible “student with a disability” received pre-employment transition services, so the VR agency reported DE 22 as 1, 2, or 3 and the pre-employment transition services it provided.
- Late in Q2, the potentially eligible “student with a disability” no longer met the definition of a “student with a disability” and the VR agency reported DE 22 as 0 in its Q2 report. Will the Edit Checks allow DE 22 to be reported as 0 and for pre-employment transition services provided earlier in Q2 to be reported? No, the VR agency should report DE 22 as 1, 2, or 3 and report the pre-employment transition services provided to the “student with a disability” during Q2.
- In Q3, the VR agency reported DE 22 as 0 and no further pre-employment transition services are reported. Is this the point where the VR agency may stop reporting the potentially eligible case? Yes, when all pre-employment transition services have been reported and DE 22 is reported as 0, VR agencies may discontinue reporting the potentially eligible “student with a disability” in the following quarter.
- In this example, it is not until Q4 that the case is no longer reported on the RSA-911.

**Q4:** For eligible “students with disabilities” who become ineligible for pre-employment transition services because they no longer meet the definition of a “student with a disability,” can VR agencies still report, through the RSA-911, other VR services provided during the quarter?

Yes, eligible individuals, who no longer meet the definition of a “student with a disability,” remain eligible for other VR services and, if the eligible individual received other VR services, the VR agency must report them on quarterly RSA-911 reports.

**Q5:** When a potentially eligible student with a disability applies for VR services, should VR agencies stop reporting the potentially eligible case in the quarter the application occurs? Should the VR agency merge the potentially eligible case data with the new VR case?

Yes, when a potentially eligible student with a disability becomes an applicant, VR agencies should report an application date in DE 7 and continue reporting on the individual within the same record, updating other data elements as permitted and as necessary. In this circumstance, the VR agency should keep the same date reported in Data Element 96: Start Date of Pre-Employment Transition Services within the potentially eligible case.

**Q6:** What does the following Edit Check error mean “Expected potentially eligible case Unique ID and Data Element 96: Start Date of Pre-Employment Transition Services Date from previous report missing when Data Element 22: Student with a Disability not 0?”

This error means that the VR agency reported a record in the previous quarter where DE 5 and DE 96 were populated and DE 22 was populated with 1, 2, or 3. This edit check will trigger an error if DE 22 is not reported as 0 and there is no record in the current quarter with the same Unique ID and Start Date of pre-employment transition services.

**Q7: How should VR agencies report the age range of students with disabilities in Data Element 74: State Definition for Age of Students with Disabilities?**

VR agencies should report the State's age range, using the minimum age determined by the VR agency(ies), which may be lower than the State's minimum age under IDEA, and the State's determined maximum age as defined under IDEA, and as it is articulated in the VR services portion of the Unified or Combined State Plan. For example, if the age range is 14 through 21, the VR agency should report "14;21" in Data Element 74.

Age ranges vary across States. For the minimum age, a State may define it as "14 or younger as determined by the IEP team" or "9th grade." For the maximum age, a State may define it as "cannot be beyond 21 prior to the start of the school year but can continue their education through the end of the year even if they turned 22" or "ages out on August 31 of the year in which they turn 22." Due to these variations, the RSA-911 Edit Checks are flexible and permit VR agencies to report a year of age below and/or a year of age above the age range based on whether the student's age changes to meet the minimum age during the reported quarter or the student's age changes but meets the State's definition that allows for the student to continue to meet the maximum age through the end of the year.

For example, if the age range is 14 through 21, a VR agency may report a case as a student with a disability who was 21 during the quarter and later turns 22 during the same quarter. In addition, a VR agency may report a case as a student with a disability who was 13 during the quarter and later turns 14 during the same quarter. In either case, the RSA-911 Edit Checks will not produce an error based on the student's age at the beginning or end of the quarter.

Note: When a State has a General VR agency and a Blind VR agency, both VR agencies must agree on the minimum age they will use to define a "student with a disability" and report this consistently in Data Element 74.

**Technical Assistance**

- VR agencies may email questions related to the RSA-911 and the WIOA performance accountability system to their assigned Data Collection and Analysis Unit [representative](mailto:representative@RSADData@ed.gov) or [RSADData@ed.gov](mailto:RSADData@ed.gov).
- VR agencies may email questions related to financial reports to their assigned [Financial Management Specialist](#) or [RSAFiscal@ed.gov](mailto:RSAFiscal@ed.gov).

Sincerely,

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/s/

Carol L. Dobak  
Deputy Commissioner,  
delegated the authority to perform  
the functions and duties of the Commissioner