Date: July 17, 2025
DCL-25-04

Dear Colleagues:

Through this Dear Colleague Letter (DCL-25-04), the Rehabilitation Services Administration (RSA) is transmitting a copy of the revised Case Service Report (RSA-911) (OMB control number 1820-0508) for the State Vocational Rehabilitation (VR) Services and State Supported Employment Services programs. In alignment with President Trump's Executive Order 14168: *Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (January 20, 2025), the Office of Management and Budget (OMB) approved a non-substantive change request to the RSA-911 on June 5, 2025. Please review Attachment I that outlines the change to Data Element 9: Sex. All other data elements remain unchanged.

DCL-25-04.xlsx

Implementation Timeline

This version of the RSA-911 becomes effective July 1, 2026, when VR agencies must begin collecting and reporting these data for program year (PY) 2026. VR agencies must continue to report RSA-911 data, in accordance with DCL-23-04, for PY 2025. On August 15, 2026, RSA will have collected the fourth quarter RSA-911 reports for PY 2025 and RSA will rescind DCL-23-04.

Use of RSA-911 Data

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 Rehabilitation Act of 1973 (Rehabilitation Act), as amended by the Workforce Innovation and Opportunity Act (WIOA). RSA also uses these data to assess the performance of the VR program through the calculation the WIOA performance indicators. In addition, RSA uses these data to support its other responsibilities under the Rehabilitation Act such as during the conduct of the annual reviews and monitoring of VR agencies required by section 107 of the Rehabilitation.

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In addition, RSA uses these data to support its other responsibilities under the Rehabilitation Act such as during the conduct of the annual reviews and monitoring of VR agencies required by section 107 of the Rehabilitation. Other important management activities, such as the provision of technical assistance, program planning, and budget development are greatly enhanced through the use of RSA-911 data. In addition, RSA uses RSA-911 data in the exchange of data with the Social Security Administration, as required by section 131 of the Rehabilitation Act, and the National Institute on Disability, Independent Living, and Rehabilitation Research within the U.S. Department of Health and Human Services. Finally, RSA-911 data is used widely by researchers for disability-related analyses and reports.

Submission Requirements

VR agencies must report RSA-911 data on a quarterly basis no later than 45 days after the end of each quarter in accordance with the following schedule:

1. Reporting Period: July 1-September 30
   Report Due: November 15
2. Reporting Period: October 1-December 31
   Report Due: February 15
3. Reporting Period: January 1-March 31
   Report Due: May 15
4. Reporting Period: April 1-June 30
   Report Due: August 15

So that a VR agency can be considered to have met the data submission requirement, the data must be submitted in accordance with the timeline above and be accurate.

Electronic Submission

VR agencies must submit RSA-911 quarterly reports through the Rehabilitation Service Administration Management Information System (RSAMIS) at rsa.ed.gov. Each VR Director is responsible for ensuring submission and certification of RSA-911 data. The VR Director may delegate this responsibility to another individual who is authorized to certify the data on behalf of the VR agency. Prior to the submission of the quarterly report, the VR Director or the individual formally delegated the authority to submit the quarterly report will be required to certify that the RSA-911 data are true, complete, and accurate, and the expenditures reported are for the purposes and objectives set forth in the terms and conditions of the Federal award.

Data Element Sequence

The RSA-911 Data Elements have been categorized to indicate the point in the VR or supported employment process when the data should be collected. The Data Elements are designed to collect information at that particular point (e.g., application, eligibility). By collecting and

reporting applicable data at the correct point in the VR process, VR agencies help to ensure data validity.

VR agencies must submit a comma delimited data file through the RSAMIS. Although some Data Elements may be left blank, a comma delimited space must be included for each Data Element in each submission. The Data Element number refers to the location of the reported response in the comma delimited text string (e.g., the second comma delimited position in the text file is the Program Year Quarter).

The RSA-911, issued in PD-19-03, included a total of 313 Data Elements. Through DCL-23-04, RSA has deleted four Data Elements and has added seven new Data Elements. As a result, the revised RSA-911 includes a total of 316 Data Elements. Because of these revisions, VR agencies report 98 Data Elements blank. For example, RSA deleted Data Element 77 (*Highest Elementary or Secondary School Grade Completed at Program Entry*) in DCL-23-04. Thus, VR agencies must leave Data Element 77 blank.

The seven new Data Elements are numbered 408 through 414. For example, RSA added Data Element 408 (*Eligibility Status*). For a complete list of revisions, please see Attachment I.

Data Element Types

Each Data Element has an associated type that serves as a guide for submitting valid values:

- VARCHAR n: Data can include any letters or numbers with a maximum length defined by "n." All variable character (VARCHAR) Data Elements that require numbers use only positive numbers.
- DATE (YYYYMMDD): Data can include dates in the eight-digit format of year, month, and day. All dates reported on the RSA-911 must be in the format of (YYYYMMDD), where (YYYY) is year, (MM) is month and (DD) is day. For Year (YYYY), record the calendar year using all four digits of the year (e.g., 2019). For Month (MM), record the months using two digits (e.g., 01 for January). For Day (DD), record the day of the month using two digits. When the day is a single digit, add a "0" prefix (e.g., 04).
- Decimal n,x: Data can include a decimal number with a total of number of "n" digits, of which "x" can be after the decimal point.
- INT n: Data can include any integer (whole number) with a maximum length of integers as defined by "n." All integers must be positive.

Reporting Requirements

RSA-911 Data Elements are mandated by the Rehabilitation Act. Applicable portions of the Rehabilitation Act explicitly or implicitly require specific Data Elements for the VR and Supported Employment programs. In addition, reporting requirements to support the performance accountability system under Section 116 of title I of WIOA are applicable to the VR program. Section 116 requires the reporting of data needed to calculate State performance on the primary indicators of performance for the core programs. In addition, States must report information on barriers to employment for participants under each of the core programs.

In accordance with 34 C.F.R. § 361.150(a)(1), for purposes of the VR program, an individual is a "participant" if he or she has an approved individualized plan for employment (IPE) and has begun receiving VR services. A "reportable individual," in accordance with 34 C.F.R. § 361.150(b), is an individual who has taken action that demonstrates an intent to use program services and who meets specific program criteria for reporting, which may include the provision of identifying information, the use of a self-service system, or receipt of information-only services or activities. The following are considered reportable individuals for the VR program:

- Individuals who have applied for VR services, but have not yet met the definition of "participant;" and
- Students with disabilities receiving pre-employment transition services prior to applying and being determined eligible for VR services and having an approved IPE (e.g., the student does not meet the definition of a "participant").

A key difference between a "participant" and "reportable individual," for purposes of the common performance accountability system, is that only "participants" are included in performance calculations for determining levels of performance for the primary indicators of performance. Furthermore, there currently is no requirement for the collection and reporting of outcome data for reportable individuals. Only participants require six quarters of post-exit reporting.

Internal Controls

As stated earlier, in accordance with 34 C.F.R. § 361.12, VR agencies must implement policies and procedures that ensure the proper and efficient administration of the VR program, including those necessary to carry out all functions for which the State is responsible under this program. These methods must include procedures to ensure accurate data collection and financial accountability. It is incumbent on VR agencies to establish policies and procedures that ensure the accurate collection, retention, and timely reporting of all data. The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) (2 C.F.R. § 200.61) defines internal controls as: a process, implemented by a non-Federal entity, designed to provide reasonable assurance regarding the achievement of objectives in the following categories: Effectiveness and efficiency of operations; Reliability of reporting for internal and external use; and Compliance with applicable laws and regulations.

VR agencies must establish and maintain internal control processes necessary to ensure the State's ability to meet the internal control requirements. RSA is responsible for the review and monitoring of VR agencies to determine whether a State is complying substantially with the provisions of the VR services portion of the Unified or Combined State Plan. The reliability and validity of RSA-911 data may be subject to desk review, monitoring, and/or audits. Sections 107(b) and (c) of the Act specify the remedies available to RSA if a State fails to satisfy Federal requirements governing the VR program, including requirements related to data reporting. States that do not meet the data reporting requirements may also face potential consequences resulting from audit findings stemming from Inspector General, State, or Single Audits.

<u>Supporting Documentation</u>

The requirements in 34 C.F.R. § 361.47 and 34 C.F.R. § 361.56, taken together, require VR agencies to maintain supporting documentation in an individual's case file, particularly regarding eligibility determinations, development of the IPE, VR services provided, and case closure. It is important to note that the use of a case management system does not remove the requirement for the VR agency to maintain either hard copies or scanned copies of required supporting documentation in the individual's service record. A case management system is merely a data entry process and it is susceptible to data entry errors.

On December 19, 2018, the Departments issued joint guidance titled, "Guidance for Validating Jointly Required Performance Data Submitted under WIOA" (RSA-TAC-19-01). This guidance provides States with a general framework for data validation. Specifically, the Departments developed the joint guidance pursuant to Section 116(d)(5) of WIOA, which requires the Departments to establish data validation guidelines to ensure the information contained in program reports is valid and reliable. VR agencies must develop data validation procedures consistent with these guidelines.

<u>Participant Individual Record Layout (PIRL)</u>

The PIRL is derived from the Joint Performance Information Collection Request and provides a standardized set of Data Elements, definitions, and reporting instructions that will be used to describe the characteristics, activities, and outcomes of WIOA participants. Under the PIRL, a "participant" for the purpose of the VR program is an individual who has an approved and signed IPE and has begun to receive services. VR agencies are required to collect participant information that corresponds with the Data Elements and descriptions delineated within the PIRL. Once collected, RSA will aggregate this information as specified in the WIOA Annual Statewide Performance Report Specifications, which 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. Where there is a direct correlation between a PIRL Data Element and an RSA-911 Data Element, the PIRL Data Element number and name have been included. A list of the PIRL Data Elements and the methodology used to calculate them is posted on the U.S. Department of Labor's Employment and Training Administration's website.

<u>Case Service Records</u>

The case service record documents the application for and/or provision of VR and supported employment services to individuals with disabilities, including the outcomes they achieve. An individual may have multiple records resulting from repeated involvement with the VR program. For example, an individual may receive pre-employment transition services and/or other VR services in secondary school and then years later apply for additional VR services. These two periods of participation in the VR program constitute separate records.

VR agencies are required to report data on open records on a quarterly basis. A record is opened either when an individual applies for VR services or, when a student with a disability begins

receiving pre-employment transition services. Application or receipt of pre-employment transition services initiate the quarterly reporting requirement for all individuals with an open record.

The case service record is considered closed when the individual has a *Date of Exit* and all of the required Data Elements, including the post-exit Data Elements, when required, have been reported. For a student with a disability who solely received pre-employment transition services and has not applied to receive other VR services, the record is closed when the individual no longer meets the definition of a student with a disability, as reported in RSA-911 Data Element 22 (*Student with a Disability*). Once a student with a disability receives a pre-employment transition service, the student must be reported on the RSA-911 even if the student is not receiving a pre-employment transition service in a quarter if the student meets the definition of a student with a disability.

However, if a student with a disability has applied and been determined eligible for VR services and has an approved and signed IPE, the student's case service record would be "closed" when the student satisfies the definition of "exit" at 34 CFR 361.150(c) because his or her record is closed pursuant to 34 CFR 361.43 or 361.56. At that time, the student would be considered to have exited the VR program for purposes of WIOA's performance accountability system as a participant.

For all other reportable individuals under the VR program, the individual will be determined to have "exited" the VR program as of the date reported in RSA-911 Data Element 353 (*Date of Exit*). Duplicate individual records will not be accepted. For example, records with the same *Social Security Number* and *Date of Application* would be considered a duplicate record. If an individual has multiple exits within the same program year, each exit must be reported and cannot overlap. For example, if an individual had more than one *Date of Application* in a quarter, the *Date of Exit* associated with the first application must be a date before the second *Date of Application*.

Unique Individuals

All data submitted for the same reporting period must be associated with a unique individual. Therefore, VR agencies must assign each individual a *Unique Identifier* that allows RSA to report an unduplicated count of individuals receiving services in accordance with the WIOA PIRL. RSA also uses the unique identifier to calculate a count of unique program participants for each State, which will be reported on the WIOA Annual Report. In addition, the unique identifier provides RSA a means to communicate with agencies regarding an individual without the exchange of Personally Identifiable Information (PII). RSA will use *Unique Identifier* and *Social Security Number* to identify a unique individual within the dataset. If an individual does not have a Social Security Number (SSN) or chooses not to provide an SSN, only the *Unique Identifier* is reported. An individual's SSN is reported only once to RSA with the *Unique Identifier.* After that, the *Unique Identifier* is the only Data Element reported with each quarterly report.

<u>Edit Checks</u>

RSA will periodically update its edit checks that detail, by Data Element, the edit checks required to ensure the integrity of data submissions and compliance with applicable statute, regulations, and policy guidance. RSA's edit checks describe constraints that must be satisfied by the data. Each data submission will be analyzed to determine whether the data is consistent with RSA's edit checks. Data submissions that fail to pass RSA's edit checks will be returned to the VR agency for correction and resubmission. Any corrections made must be consistent with the VR agency's case management system and the supporting documentation maintained by the VR agency. VR agencies are responsible for ensuring that any data submitted conforms to RSA's edit checks and data submission requirements. Compliance with RSA's edit checks is but one component of the VR agency's internal controls system necessary to ensure the integrity of RSA-911 data. VR agencies should <u>not</u> imply the correctness or completeness of data submissions from compliance with the RSA's edit checks alone.

RSA's edits checks will also be available for testing, through the RSAMIS, when RSA is not collecting RSA-911 quarterly reports as outlined above. RSA encourages VR agencies to test their RSA-911 quarterly reports during these timeframes.

<u>Correction Procedures</u>

Despite the rigorous internal controls VR agencies have implemented and continually refine related to collecting and reporting accurate RSA-911 data, RSA recognizes that VR agencies will occasionally report information that is incorrect. As a result, RSA has established three ways VR agencies may address them. When a VR agency identifies a reporting error and regardless of the specific correction procedure it uses to fix the error, RSA encourages the VR agency to reassess the effectiveness of its internal controls to inform whether they should be enhanced to avoid future errors in reporting.

1. Correct the error internally and report the corrected information on future RSA-911 reports within the Program Year's reporting period

Within the Program Year's reporting period, VR agencies may internally correct any Data Element, that does not identify the individual. In other words, VR agencies may update, without RSA's approval, any Data Element <u>except</u> the following four:

1. Data Element 5: Unique Identifier;
2. Data Element 6: Social Security Number;
3. Data Element 7: Date of Application; and
4. Data Element 96: Start Date of Pre-Employment Transition Services

Example: A VR counselor records an applicant's date of birth in the case management system and the agency reports this date to RSA on its Q1 report. However, in Q2, the VR agency discovers that the applicant was born on a different date. The VR agency may report the corrected date of birth on its Q2 report. In this example, RSA will use the birthdate reported in Q2 in the annual report calculations.

Data Elements 5, 6, 7, and 96 cannot be updated, in this way, because RSA uses these Data Elements to uniquely identify cases and track students with disabilities who receive pre-employment transition services. If a VR agency reports information that changes these Data Elements in future RSA-911 reports, RSA will consider this as a newly reported case. If the VR agency is aware that one or more of these Data Elements has changed for any reason (e.g., correction to a Social Security Number, merge that results in a Unique ID change, inaccurate date reported) then corrections must be made to the record on each of the previously reported reports in RSA's database before the VR agency may report the corrected Unique ID, SSN, Date of Application, or Start Date of Pre-Employment Transition Services. In these instances, VR agencies must contact RSA to request a correction per the procedures outlined next.

2. Request a correction to Unique Identifier, Social Security Number, Date of Application, or Start Date of Pre-Employment Transition Services

VR agencies must request all corrections to Data Elements, 5, 6, 7, and 96 by sending a file to RSAData@ed.gov. The file must include, as appropriate, the following:

- Previously Reported Unique ID
- Revised Unique ID
- Previously Reported Application Date
- Revised Application Date
- Revised SSN
- Previously Reported Start Date of Pre-Employment Transition Services
- Revised Start Date of Pre-Employment Transition Services

VR agencies may submit a csv file or Excel file and must use the following format:

Previous Unique ID	Revised Unique ID	Previous Application Date	Revised Application Date	Revised SSN
ZZ0100004239	ZZ0100004240	11/05/2015	11/15/2015	999999999
ZZ0100004589		7/26/2016	7/26/2015	
ZZ0100012362	ZZ0100012372			
ZZ0200014876				555555555

Only the Data Elements requiring correction should be included in the file. If the VR agency is only correcting the Unique ID, the VR agency should not include values for Application Date, SSN, or Start Date of Pre-Employment Transition Services. SSNs should include all nine numbers without dashes. The csv or Excel file must be encrypted if it contains SSNs.

All corrections to Data Elements 5, 6, 7, and 96 must be submitted within 44 days after the quarter. In other words, RSA will not accept correction requests submitted on the 45th day when the quarterly report is due by 11:59PM Eastern. This change is necessary to ensure RSA is able to make corrections to the database in a timely manner and ensure all VR agencies meet the reporting deadline.

3. Request that RSA Disapprove an RSA-911 Report and Resubmit

Finally, VR agencies may request that RSA disapprove a submitted RSA-911 report so the VR agency may resubmit with corrected information. If a VR agency submits an RSA-911 report and later identifies that it reported widespread errors related to the WIOA performance indicators, it may be more effective to resubmit the report in its entirety. VR agencies may request that RSA disapprove a quarterly report by emailing RSAData@ed.gov. The email must include the following information:

- VR Agency Name;
- Program Year and Quarter
- Justification to resubmit quarterly report; and
- Summary of refinements the VR agency has made to its internal control to prevent incorrect reporting in the future.

If approved, RSA will inform the VR agency the date by which the VR agency must resubmit the quarterly report. RSA will only consider requests to disapprove quarterly reports and allow VR agencies to resubmit them if the request is made within the Program Year's reporting period. For example, if a VR agency requests to resubmit its Program Year 2024 Q1, Q2, Q3, or Q4 report before August 15, 2025 (when the Program Year 2024 reporting period concludes), RSA will consider the request. If a VR agency requests to resubmit a prior Program Year's quarterly report and the reporting period for that Program Year has concluded, RSA will not consider this request.

RSA reminds VR agencies that it must use the RSA-911 data submitted as of August 15, when the fourth quarter's reporting period concludes, to produce the WIOA Annual Reports. As a result, RSA will not accept data corrections after August 15. RSA will review changes made to Data Elements and reserves the right to reject changes VR agencies propose for all Data Elements.

Inquiries

Please email any questions related to the revised RSA-911 to RSAData@ed.gov.

Sincerely,

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Christopher Pope
Director, State Monitoring and Program Improvement Division,
delegated the authority to perform the functions
and duties of the Commissioner

Attachment

Attachment I: Summary of Revisions to Case Service Report (RSA-911)

OMB Control #	RSA Title	Prior ICR Reporting Requirements	ICR Reporting Requirements Effective in FFY 2026
1820-0508	Case Service Report (RSA-911)	Data Element 9 – Gender: Report the individual's gender. If the individual discloses any gender other than Male or Female report code 3 [Nonbinary or another gender]. If the individual does not want to disclose gender information, report code 9 [Prefer not to answer]. Code Values: 1 = Male 2 = Female 3 = Nonbinary or another gender 9 = Prefer not to answer	Data Element 9 – Sex: Report the individual's sex. If unknown, report code 9 [Unknown]. Code Values: 1 = Male 2 = Female 9 = Unknown