College of Education
Interwork
Institute

Interwork Institute
San Diego State University
6367 Alvarado Court, Suite 350
San Diego CA 92120

VOICE: 619.594.2462
FAX: 619.594.4208
http://interwork.sdsu.edu/

Smarter Data, Better Outcomes: Streamlining the RSA-911 Report to Reduce Administrative Burden and Refocus Vocational Rehabilitation on Building America's Workforce

National Rehabilitation Leadership Institute (NRLI)

Cohort R – Group 1

Pamela Clayton-Johnson, Maryland Division of Rehabilitation Services, Program Manager II
Sarah Leonard, South Carolina Commission for the Blind, Planning and Reporting Director
Gustavo Manzanales, Arkansas Division of Services for the Blind, Rehabilitation Program Manager

Executive Summary

State Vocational Rehabilitation (VR) programs are currently required by the Rehabilitation Services Administration (RSA), through sub-regulatory guidance, to report quarterly participant data through the RSA-911 Case Service Report. Section 101(a)(10) of the Rehabilitation Act requires annual reporting and does not prescribe quarterly case-level data collection. While the RSA-911 has existed for over three decades, its data collection requirements have expanded from 150 data elements to over 300 per participant, many of which exceed statutory or regulatory requirements. The resulting administrative burden diverts critical time and resources away from the mission of VR to help individuals with disabilities achieve and maintain competitive integrated employment.

To address these issues, this paper proposes a multi-phased approach that will ultimately increase data quality, reduce administrative burden, and allow VR staff to dedicate more time to direct service delivery. Recommended actions include the following:

1. **Removing unnecessary data requirements**, including data element 21 (Source of Referral) and 70 data elements related to Purchased Service Provider Type and Comparable Services and Benefits Provider Type;

2. **Developing centralized Federal databases and data sharing systems** to collect information on other Workforce Innovation and Opportunity Act (WIOA) program involvement and post-exit wage and credential data, eliminating the need for data elements 54-61 and improving data accuracy;
3. **Conducting a comprehensive review of the RSA-911 under the Paperwork Reduction Act (PRA)** to consolidate similar service categories and determine an accurate estimate of annual burden hours.

Impact (Part One)

The current RSA-911 reporting requirements, outlined in DCL-23-04, place significant administrative burden on state VR programs nationwide. Over time, the RSA-911 has expanded to include data elements beyond the statutory requirements of WIOA and the Rehabilitation Act of 1973, resulting in inefficiencies on all levels of VR program administration from counselors to IT staff and program directors.

VR counselors often report spending large portions of their time entering data into case management systems rather than delivering direct services to participants. While case documentation is essential, the amount of documentation required by the RSA-911 ultimately takes counselors away from conducting their core duties of determining eligibility, implementing Individualized Plans for Employment (IPEs), providing vocational counseling and guidance, and providing or coordinating VR services.

Additionally, VR staff (counselors, administrative assistants, managers, IT, etc.) must validate at least 25 data elements for each VR case, outlined in PD-19-01. Many of these data elements require specific source documentation obtained from VR participants and entered into the case management system. This process adds administrative work and has resulted in some VR programs diverting full-time positions and funds from counselor positions to fund additional administrative assistants and data specialists reducing the number of counselors available to provide direct services to participants.

WIOA requires states to annually report aggregate outcomes for participants receiving career and training services. However, RSA's current sub-regulatory guidance (DCL-23-04) requires a level of data collection and reporting that goes beyond WIOA and the Rehabilitation Act. As a result, national VR data collection emphasizes compliance over program outcomes, pulls resources away from direct service provision, and ultimately goes against the purpose of the VR program to provide individualized services that empower individuals with disabilities to prepare for, obtain, and maintain employment.

Background

The RSA-911 Case Service Report was established more than three decades ago by RSA to collect data from all state VR programs. The purpose of the report is to provide RSA (and ultimately Congress) with information on the individuals served by the VR program, the services they receive, and the employment outcomes they achieve. This data is used by RSA to develop their annual report to Congress, to support program monitoring activities under section 107 of the Rehabilitation Act, and performance accountability requirements outlined in WIOA.

Over the years, the RSA-911 report has evolved from an annual report with approximately 150 data elements for each VR participant whose case was closed during a given program year, to a quarterly report requiring over 300 data elements for every VR applicant, participant, and former participant whose cases closed within the past six quarters. This significant change in reporting frequency and data volume has greatly increased the data collection, reporting, and validation workload for state VR programs.

Additional data elements have been introduced over the years through RSA's sub-regulatory guidance rather than statutory or regulatory changes. For example, WIOA requires states to report aggregate outcomes for participants receiving career and training services, yet the RSA-911 requires states to collect and report detailed, individual-level data on each service provided, its start and end dates, the provider type, and associated costs. These requirements are well beyond what is necessary to meet federal performance accountability requirements.

The increasing complexity of the RSA-911 has also affected data management and case management system design. State agencies must either purchase or develop a sophisticated, costly case management system capable of capturing and transmitting the required data elements. Each quarterly reporting cycle requires internal data validation, edit checks, and data corrections to ensure accuracy and compliance. The technical and financial resources required to sustain case management systems continue to grow as data collection requirements are increased.

In 2018, 2020, and 2023, several state VR programs voiced concerns during the Office of Management and Budget (OMB) PRA review cycles of the RSA-911. States cited continued concerns over underestimated burden estimates, the actual value vs. burden of new data elements, and potential duplication of reporting across WIOA programs. These public comments show consistent concern that the RSA-911 emphasizes data quantity and compliance rather than data quality and utility. Ultimately, the RSA-911 creates inefficiencies in the VR program that go against the intent of WIOA to streamline workforce development programs and promote efficient service delivery.

Proposed Changes

To address the inefficiencies and administrative burden created by the current RSA-911 data collection requirements, several actions are recommended to align VR's case service reporting with statutory requirements, improve data quality, and refocus state VR resources on direct service delivery. These proposed actions align with the requirements of the PRA and the priorities outlined in the U.S. Department of Labor's recently published *America's Talent Strategy: Building the Workforce for the Golden Age*.

The first proposed change is to eliminate RSA-911 data elements that exceed statutory or regulatory requirements and do not directly contribute to program accountability or WIOA common performance measures. Specifically, the recommendation is to remove data elements 21, Source of Referral, and 70 data elements related to Purchased Service Provider Type and Comparable Services and Benefits Provider Type. These data elements task VR staff with entering data that has limited value to RSA and Congress and is beyond the requirements of WIOA, which only requires tracking of referrals to and from the one-stop system and aggregate information on service provision (29 U.S.C. § 721(a)(10)). RSA should instead only collect data on referrals from the one stop system through the RSA-911 and collect service

provider type data annually from an aggregate level through a modified WIOA annual report (i.e., ETA-9169). Although additional referral source and service provider data may be useful at the state level, collecting and reporting this information at the Federal level adds administrative burden without improving the accuracy or usefulness of national performance data. State VR programs can opt to still collect this data on their own if they feel it is beneficial for their programs; however, removing the sub-regulatory requirement to report it to RSA will significantly reduce time spent on data entry and maintenance of case management systems to transmit this data. This change directly aligns with the PRA, which requires Federal agencies to "minimize the burden of information collection on those who are to respond, including with respect to small entities, individuals, and state and local governments" (44 U.S.C. § 3501(1)). Eliminating RSA-911 data elements 21, 99, 105, 111, 117, 123, 131, 135, 138, 142, 145, 149, 152, 156, 159, 163, 165, 169, 172, 176, 179, 183, 186, 190, 193, 197, 200, 204, 207, 211, 214, 218, 221, 225, 228, 232, 235, 239, 242, 246, 249, 253, 256, 260, 263, 267, 270, 274, 277, 281, 284, 289, 293, 296, 300, 303, 307, 310, 314, 317, 321, 324, 328, 331, 335, 338, 342, 404, 407, 411, and 414 would align data collection practices with the requirements of the PRA.

The second proposed change is for RSA to advocate for the Departments of Labor, Education, and Health and Human Services to collaborate to develop a secure, centralized Federal database capable of collecting and sharing data across WIOA core programs. Such a system would automate the collection of information currently captured in RSA-911 data elements 54-61, which document other WIOA program involvement. Currently, this data is manually collected by VR staff and is often inaccurate due to participant and staff's limited knowledge of other WIOA programs.

Additionally, RSA should collaborate with entities such as the National Student Clearinghouse and the U.S. Department of Labor to develop national data sharing agreements to improve data accuracy and reduce duplication. Currently, individual state VR programs must negotiate agreements with these entities to gain access to valuable Federal wage and credential attainment data. Such agreements require VR staff's time to establish and maintain. When agreements expire, or are never established, it makes it challenging for programs to obtain this data, resulting in inaccurate reporting of post-exit data for credential attainments, effectiveness in serving employers, and employment rates second and fourth quarter after exit (WIOA common performance measures). A national data sharing agreement supports the workforce modernization vision outlined in *America's Talent Strategy: Building the Workforce for the Golden Age*, which calls for Federal agencies to "reduce administrative barriers, streamline reporting requirements, and create interoperable data systems that allow states to spend less time on compliance and more time on service delivery" (U.S. Department of Labor, 2025, p.8).

Finally, RSA should initiate a full review of the RSA-911 under the PRA to ensure that all data elements have proven utility and that the estimated national burden hours reflect the actual work required of state VR programs. This review should include an assessment of the necessity and redundancy of all data elements, consolidation of similar service categories into broader groups, and updated burden calculations based on desk audits from state agencies and staff responsible for data entry, validation, and reporting. Conducting this review would ensure the information in the RSA-911 is "necessary for the proper performance of the functions of the agency, has practical utility, and is not unnecessarily duplicative" (44 U.S.C. § 3506(c)(3)).

In combination, these proposed changes would modernize the RSA-911, align reporting requirements with Federal law, and promote the efficiency and accountability envisioned in the PRA, WIOA, and *America's Talent Strategy: Building the Workforce for the Golden Age*. Most importantly, these changes would allow VR programs to redirect the valuable resource of staff time to providing direct services to help individuals with disabilities achieve competitive integrated employment.

Impact (Part Two)

Eliminating unnecessary data elements would significantly reduce the administrative time required for data entry and system maintenance. Streamlining these requirements would allow counselors and administrative staff to redirect time toward providing services that have a direct impact on participant outcomes such as counseling and guidance and coordination of individualized services, resulting in participants receiving services more efficiently.

The establishment of a centralized database for WIOA program data and national data-sharing agreements with entities such as the National Student Clearinghouse would reduce duplication of data collection among WIOA programs. It would also enhance the accuracy of Federal reporting by eliminating reliance on manual data collection and entry and participant self-reporting. RSA and state VR programs would gain access to more reliable program outcome data for WIOA common performance indicators without increasing reporting demands on VR staff. This accurate, automatically verified data would also improve RSA's ability to assess program effectiveness, identify trends, and make informed policy decisions.

Conducting a comprehensive review of the RSA-911 under the PRA would ensure that each data element collected by RSA is legally justified, non-duplicative, and of utility. This process would modernize VR reporting in line with the PRA and the GPRA Modernization Act of 2010, which directs Federal agencies to "use performance information to improve program outcomes … and reduce unnecessary administrative burdens" (Pub. L. No. 111-352, § 2, 2011). An updated, evidence-based burden estimate would also strengthen RSA's compliance with the OMB and PRA by providing a more accurate estimate of the true workload experienced by state agencies. This transparency could improve collaboration between RSA and states and promote a shared understanding of the balance between accountability and efficiency.

Lastly, the proposed changes align the VR program with the broader Federal vision for workforce modernization described in *America's Talent Strategy: Building the Workforce for the Golden Age*, which emphasizes the need to streamline reporting requirements and allow states to spend more time on service delivery (U.S. Department of Labor, 2025, p. 8). Implementing these changes would position RSA as a leader in workforce modernization efforts and reduce fragmentation across WIOA programs.

Ultimately, these proposed changes would transform the RSA-911 from a compliance driven report into a meaningful program evaluation tool that ensures data quality while allowing state VR programs to focus on achieving the mission of VR.

Conclusion

The current RSA-911 Case Service Report, while designed to promote accountability, has expanded beyond statutory requirements, creating unnecessary administrative burden for state VR programs.

Through years of sub-regulatory guidance changes, the RSA-911 has grown to more than 300 data elements, many of which require significant staff time for collection, validation, and reporting. This expansion has shifted focus away from direct service delivery, diverting counselors and administrators from their core mission of helping individuals with disabilities achieve competitive integrated employment.

Implementing the proposed changes, removing unnecessary data elements, developing centralized data-sharing systems, and conducting a comprehensive review of the RSA-911 under the PRA, would modernize Federal reporting and restore alignment with both statutory requirements and national workforce development priorities. These actions would streamline data entry, improve accuracy, and promote collaboration across WIOA core programs, enabling VR staff to dedicate more time to meaningful participant engagement. At the national level, this modernization would reduce administrative costs, enhance data quality, and support the broader Federal vision outlined in *America's Talent Strategy: Building the Workforce for the Golden Age*, which calls on agencies to "reduce administrative barriers, streamline reporting requirements, and create interoperable data systems that allow states to spend less time on compliance and more time on service delivery" (U.S. Department of Labor, 2025, p. 8). In doing so, RSA would ensure that Federal reporting supports, not hinders, the purpose of the VR program: empowering individuals with disabilities to prepare for, obtain, and maintain competitive integrated employment.

References

Office of Management and Budget. (1995). *Paperwork Reduction Act of 1995, 44 U.S.C. §§ 3501–3521*.

Rehabilitation Act of 1973, 29 U.S.C. § 701 et seq. (as amended by the Workforce Innovation and Opportunity Act of 2014).

Rehabilitation Services Administration. (2023). *Annual report for the Federal Fiscal Years 2021–2022*. U.S. Department of Education.

U.S. Congress. (2011). *GPRA Modernization Act of 2010, Pub. L. No. 111-352*.

U.S. Department of Education, Rehabilitation Services Administration. (1999). *Policy Directive 99-09: Case Service Report (RSA-911) form and instructions for fiscal year 1999/2000 reporting* (PD 99-09).

U.S. Department of Education, Rehabilitation Services Administration. (2019). *Policy Directive 19-01: Requirements for validating Case Service Report (RSA-911) data*.

U.S. Department of Education, Rehabilitation Services Administration. (2023). *Data Collection Letter (DCL)-23-04: Case Service Report (RSA-911) for the Vocational Rehabilitation and Supported Employment Programs*.

U.S. Department of Education, Rehabilitation Services Administration. (2021, March 30). *Supporting statement, case service report (RSA-911) (OMB Control No. 1820-0508)*.

U.S. Department of Education. (2018, October 1). *Agency information collection activities; comment request; Case Service Report (RSA-911) [Docket No. ED-2018-ICCD-0100]*. *Federal Register*.

U.S. Department of Education. (2020, December 10). *Agency information collection activities; comment request; Case Service Report (RSA-911) [Docket No. ED-2020-SCC-0187]*. *Federal Register*.

U.S. Department of Education. (2023, April 20). *Comment request; Case Service Report (RSA-911) [Docket No. ED-2023-SCC-0063]. Federal Register*.

U.S. Department of Labor. (2025). *America's talent strategy: Building the workforce for the golden age*.

Workforce Innovation and Opportunity Act of 2014, Pub. L. No. 113-128, 128 Stat. 1425.