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Bridging the Gaps: A Call for a National Vocational Rehabilitation Data Clearinghouse to Enhance Interstate Collaboration and Outcomes

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Executive Summary

The Vocational Rehabilitation (VR) program is a cornerstone of disability employment policy, yet its state-based, siloed data infrastructure creates significant barriers for participants who move or require services from multiple states. This fragmentation leads to service delays, duplication of effort, and an incomplete national picture of program performance. These delays are a critical factor in a nationwide decline in VR applications and successful employment outcomes, as they directly contribute to client disengagement. This paper proposes the creation of a secure, national VR data clearinghouse where states would contribute and access key data points on eligibility, services, and outcomes. This system, modeled on successful precedents like the Department of Labor's State Wage Interchange System (SWIS), would streamline service delivery, facilitate compliance with multi-state service guidance like Rehabilitation Services Administration (RSA) Technical Assistance Circular (TAC) 12-04, and provide invaluable data for program improvement, creating the essential infrastructure needed for the rapid and sustained engagement that RSA has identified as critical in TAC 24-01. This approach is proven to increase successful outcomes, ultimately fostering a more seamless and effective national VR system for individuals with disabilities.

Impact Statement

The absence of a centralized data-sharing mechanism in the VR program has a direct negative impact on individuals with disabilities and the agencies serving them. For a participant moving to a new state, the process often involves starting from square one: re-applying, re-submitting documentation, and potentially undergoing new assessments to determine eligibility, even if they were actively receiving services just days before. This creates frustrating delays in critical support, potentially disrupting education, or training, or a pending job placement. This breakdown in service continuity directly undermines the core principles of "meaningful and sustained engagement" outlined in TAC 24-01, which emphasizes that the quality of a participant's experience has a direct impact on their success.

This procedural friction is not just an inconvenience; it is a primary driver of unsuccessful case closures nationwide. Recent analysis by the Vocational Rehabilitation Technical Assistance Center for Quality Management (VRTAC-QM) reveals that over 30% of all VR cases are closed unsuccessfully before an Individualized Plan for Employment (IPE) is even developed. The primary reasons cited for these early exits are "no longer interested in receiving services" and "unable to locate or contact," both clear hallmarks of disengagement caused by a slow and cumbersome process. This aligns with concerns raised in TAC 24-01, which explicitly calls on states to "expedite application and eligibility to sustain engagement" by removing unnecessary barriers. The data shows a direct correlation: the longer the delay between application and eligibility, the higher the likelihood that the agency will lose contact with the individual and close the case unsuccessfully (VRTAC-QM, 2022).

For state VR agencies, this fragmentation results in significant administrative inefficiency and redundant expenditures on assessments that have already been completed. Nationally, the lack of data portability makes it nearly impossible to accurately track long-term outcomes for a mobile population or effectively implement guidance such as RSA-TAC 12-04, which allows for coordinated services by more than one state agency. This data deficiency ultimately hinders the ability to identify national trends, replicate best practices, and demonstrate the program's collective impact as envisioned under the Workforce Innovation and Opportunity Act (WIOA).

Background

The VR program operates as a partnership between RSA (Federal) and the individual state agencies. While this structure allows for state-level flexibility, it has also resulted in 78 separate agencies operating largely independent data systems. This creates profound barriers to collaboration. When an individual seeks services in a new state, there is no standardized, secure protocol for the new VR agency to access the individual's records, including eligibility determinations, IPE, and service history, from their previous state.

This problem is compounded by RSA's own technical assistance, specifically RSA-TAC 12-04, which clarifies that an individual can be served by more than one state VR agency simultaneously when appropriate. For example, a student attending an out-of-state college may need support from both their home state agency and the agency where their college is located. The current system makes coordinating these services, sharing costs, and avoiding duplication of services exceptionally difficult. Furthermore, Federal oversight and performance measurement are hampered by data inconsistencies. A

2014 Government Accountability Office (GAO) report highlighted challenges in ensuring the consistency and reliability of VR performance data across states, a problem that a unified data system could help mitigate (U.S. Government Accountability Office, 2014). The current landscape is one of well-intentioned but disconnected systems that fail to reflect the reality of a mobile American workforce.

Proposal

We propose the development and implementation of a National VR Data Clearinghouse, to be managed by RSA in partnership with state VR agencies. This secure, access-controlled system would serve as a central repository for a limited, standardized set of key data elements.

System Functionality

State VR agencies would securely upload and access essential data points, including the following:

- Individual's eligibility status and date of determination: A National Clearinghouse would make this information instantly available, directly addressing a primary cause of delay. VRTAC-QM data shows that shorter durations between application and eligibility are directly correlated with higher rates of successful rehabilitation.
- Key components of the IPE, such as the employment goal.
- Major services being provided (e.g., post-secondary education training, assistive technology, job placement, etc.).
- Case closure status and employment outcome data.

Precedent for Success

This model is not without precedent. The DOL SWIS has successfully enabled states to share quarterly wage data for over a decade to track employment outcomes for workforce programs across state lines (U.S. Department of Labor, n.d.-a). Similarly, the Social Security Administration's (SSA) Open Data Initiative demonstrates Federal commitment to making non-public programmatic data available for analysis management, proving the technical and administrative feasibility of such systems (U.S. SSA, n.d.). Initiatives like DOL's Workforce Data Quality Initiative (WDQI) grants have already laid the groundwork by helping states build the capacity for longitudinal data systems that could feed into a national clearinghouse (U.S. Department of Labor., n.d.-b).

Privacy and Security

The system must be designed with the preservation of individual privacy as a foundational principle. Data sharing would be subject to strict compliance with all applicable Federal and state privacy laws, including the Health Insurance Portability and Accountability (HIPPA) and the Family Educational Rights and Privacy Act (FERPA). Access would be role-based, encrypted, and contingent upon obtaining informed, written consent from the VR participant. This ensures the individual remains in control of their personal information while allowing them to benefit from seamless service continuity.

Regulatory Alignment

This change would not require major statutory overhaul of the Rehabilitation Act but would necessitate new regulation or sub-regulatory guidance from the Department of Education to establish data standards, participation requirements, and security protocols. This aligns with the data-driven spirit of WIOA and legislative proposals like the *A Stronger Workforce for America (ASWA)*, which emphasizes performance accountability and evidence-based practices (U.S. House Committee on Education and the Workforce, 2023).

Impact

Implementing a National VR Data Clearinghouse will produce immediate and long-term positive outcomes. For participants, it will mean faster access to services when relocating, ensuring continuity of support that is critical for success. This "no wrong door" approach reduces participant burden and empowers them to pursue opportunities without fear of losing their VR support system. This acceleration is not merely a matter of convenience; it is a strategic imperative. The clearinghouse becomes a foundational tool for implementing the very strategies RSA champions in TAC 24-01, which states that "timely engagement…is essential" and urges agencies to "eliminate delays in the referral and application process." For instance, the clearinghouse allows for the immediate use of existing eligibility data from another state, directly answering the TAC's call to use existing documentation to the maximum extent possible to expedite service delivery. This directly supports Rapid Engagement strategies, which VRTAC-QM defines as moving individuals through the VR process "as quickly and efficiently as possible in order to maximize the likelihood that they will be active and full participants in their rehabilitation plans and achieve successful outcomes" (VRTAC-QM, 2022). National data demonstrates a clear correlation: the faster an individual moves from application to services, the more likely they are to remain engaged and achieve a successful employment outcome.

Specifically for customers served by multiple states, the clearinghouse is the primary mechanism to achieve the "sustained engagement" that TAC 24-01 calls for. Engagement is not just about speed but about the "ongoing cultivation of relationships." When a participant moves, the current system severs the relationship and momentum built with their previous counselor. The clearinghouse transforms this abrupt stop into a warm handoff. A new counselor can instantly access the participant's IPE, service history, and employment goal, allowing them to pick up the conversation where it left off. This continuity builds trust, validates the participant's prior efforts, and sustains their active participation in the VR process, preventing the attrition and disengagement that TAC 24-01 is designed to combat.

For state VR agencies, the clearinghouse will substantially reduce administrative redundancies, freeing up valuable counselor time and financial resources to be reinvested in direct services. It will provide the necessary infrastructure to operationalize TAC 12-04, allowing for seamless, documented collaboration between states serving the same individual. At the national level, RSA and policymakers will gain an unprecedented, near-real-time view of the VR program's performance, enabling sophisticated cross-state analysis, identification of effective strategies, and a more accurate accounting of the program's return on investment.

Conclusion

The current, fragmented data infrastructure of the Vocational Rehabilitation program is an anachronism that creates unnecessary barriers for individuals with disabilities and inhibits program efficiency and accountability. The development of a secure National VR Data Clearinghouse is a practical, feasible, and necessary step to modernize the program. By leveraging proven models from the Department of Labor and Social Security Administration, VR can build a system that protects privacy while promoting portability of services. This change will empower participants, increase agency efficiency, enable effective interstate collaboration, and provide the high-quality data needed to continuously improve employment outcomes by fostering the rapid and sustained engagement that is proven to lead to success for people with disabilities across the nation and is a state priority of the Rehabilitation Services Administration.

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