

**UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF SPECIAL EDUCATION AND  
REHABILITATIVE SERVICES  
REHABILITATION SERVICES ADMINISTRATION  
WASHINGTON, DC 20202-2800**

**POLICY DIRECTIVE  
RSA-PD-12-07  
DATE: March 5, 2012**

- ADDRESSEES:** STATE VOCATIONAL REHABILITATION AGENCIES  
STATE REHABILITATION COUNCILS  
TECHNICAL ASSISTANCE AND CONTINUING EDUCATION  
CENTERS  
AMERICAN INDIAN VOCATIONAL REHABILITATION  
PROGRAMS  
CLIENT ASSISTANCE PROGRAMS  
CONSUMER ADVOCACY ORGANIZATIONS
- SUBJECT:** Announcement of the OMB Approval for the on-line submission of the  
Corrective Action Plan (CAP) for the Vocational Rehabilitation Services  
Program and the Supported Employment Services Program.
- BACKGROUND:** The Office of Management and Budget (OMB) has approved a new  
information collection instrument for the on-line submission of the  
Corrective Action Plan for Vocational Rehabilitation (VR) Services  
Program and the Supported Employment (SE) Services Program. The  
approval of this information collection instrument will expire on  
November 30, 2014. The OMB Control Number for this collection is  
1820-0694.
- DISCUSSION:** Section 107 of the *Rehabilitation Act of 1973*, as amended (*Rehabilitation  
Act*), requires the Commissioner of the Rehabilitation Services  
Administration (RSA) to conduct annual reviews and periodic on-site  
monitoring of the vocational rehabilitation (VR) program to determine  
whether a state agency is complying substantially with the provisions of  
its State Plan under section 101 of the Act and with the evaluation  
standards and performance indicators established under section 106.  
When, based on its monitoring, RSA determines that a state agency is not  
operating the VR program in compliance with its State Plan, the  
*Rehabilitation Act* and implementing regulations at 34 CFR Part 361, the  
agency must develop a corrective action plan (CAP) for RSA approval  
within 45 days from the issuance of the final monitoring report.  
Beginning in FY 2012, each of the VR agencies monitored during the year  
that RSA has found to be out of compliance with federal requirements will

use the form located on the RSA MIS to submit a CAP for RSA approval and thereafter to report progress on the action steps contained in the CAP on a quarterly basis, until such time as each compliance finding represented by the CAP is resolved.

The CAP must contain the specific steps that the VR agency will take to resolve the findings, timelines for completion of these steps, as well as methods for evaluating that the steps taken have resolved the findings. RSA requires the agency to report progress toward completion of the CAP on a quarterly basis. Using this information for each VR agency required to submit a CAP, RSA will be able to track the agency's progress toward the resolution of the compliance findings and identify the need for technical assistance to enable it to carry out the corrective actions. In addition, RSA will be able to use this on-line system to identify trends in the nature of the compliance findings common among the VR agencies and the technical assistance needs of the VR agency network as a whole, thereby assisting the agencies to avoid future findings of non-compliance.

### **Procedures for Submitting the CAP and Quarterly Progress Reports**

RSA developed the capacity for the FY 2012 and all future CAP and Quarterly Progress Reports to be submitted online through the RSA MIS. This web-based approach to CAP submission affords state agencies a number of benefits, including:

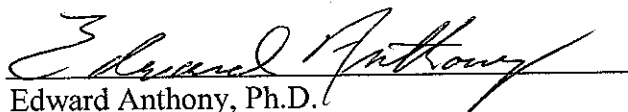
- ease of submission by state agency personnel charged with developing the CAP;
- greater clarity of the content requirements for the CAP with the use of prompts throughout the template;
- a significant reduction in the amount of paperwork state agencies will need to prepare and transmit to RSA;
- full accessibility for individuals using screen access technologies; and
- a simplified process for updating the CAP on a quarterly basis.

To begin the submission process, the individual in the state agency responsible for entering CAP information is required to have a user ID to access the RSA website. If you have a user ID to <http://rsa.ed.gov>, log in and then click on the dropdown menu titled *Help* and then select the option *Technical Support*. Under *Technical Support*, open the option *I*

*Need to Enter Data on a Form that Isn't Listed on my Data Entry Screen* and follow the prompts. If you need assistance, contact *Technical Support* via the link within the *Help* menu or at the email address below. If you do not have a user ID, go to <http://rsa.ed.gov> and click on the dropdown menu titled *Help*, and then select *Info for New Users*. If you have forgotten your user ID or password, go to <http://rsa.ed.gov> and click on *Log On*. Refer to the link under "New User?" entitled *Click Here If you Have Any Problems Logging In*. If you require further assistance, send an email to [RSAMIS.Technical.Support@ed.gov](mailto:RSAMIS.Technical.Support@ed.gov).

**INQUIRIES:**

For questions regarding the content of CAP submissions, please contact your RSA state liaison. For technical questions about the RSA MIS, please contact Ken Schellenberg at [ken.schellenberg@ed.gov](mailto:ken.schellenberg@ed.gov).

  
Edward Anthony, Ph.D.  
Deputy Commissioner

**ATTACHMENT:**

cc: Council of State Administrators of Vocational Rehabilitation  
National Council of State Agencies for the Blind  
National Disability Rights Network

OMB Number: 1820-0694

Expiration Date: November 30, 2014

**Rehabilitation Services Administration  
Vocational Rehabilitation Program  
Corrective Action Plan  
Instructions for Completion of On-Line Form**

Pursuant to Section 107 of the *Rehabilitation Act of 1973*, as amended, the Rehabilitation Services Administration (RSA) is required to conduct periodic monitoring of the vocational rehabilitation (VR) programs in each state. VR agencies found to be out of compliance with federal requirements as a result of this monitoring must develop for RSA approval corrective action plans (CAP) using the on-line form located on the RSA management information system (MIS). In addition, the agencies must use the on-line form to report progress toward resolution of the findings specified in the CAPs on a quarterly basis. The instructions for completion of each field contained in the CAP on-line form are as follows:

**Monitoring Report URL (MSWord)**

Enter the Internet address link to the RSA published Monitoring Report in Microsoft Word document format located at <http://rsa.ed.gov>.

**Monitoring Report URL (PDF)**

Enter the Internet address link to the RSA published Monitoring Report in Adobe PDF format located at <http://rsa.ed.gov>.

**Monitoring Report Publication Date**

Enter the publication date of the Monitoring Report found on the document cover page using two digit month/ two digit day/ and four digit year. Example:12/01/2010.

**Finding Headline**

For each finding covered by the CAP, enter the Finding topical headline from the Monitoring Report. For example, "Internal Controls."

For each finding, enter data by selecting the "Add a New Finding" expansion menu and completing all information as identified below.

**Finding**

Enter a brief statement of the finding narrative as contained in the Monitoring Report into the text field provided. For example, "The agency is not in compliance with [citations of relevant statutory and/or regulatory provisions], because..." Typically, such statements can be copied directly from the Monitoring Report.

**Mandated Corrective Action**

Enter the mandated corrective action associated with the finding as contained in the Monitoring Report.

**RSA Focus Area**

Determine from the dropdown menu whether the finding relates to an RSA focus area and select the appropriate response.

**Corrective action 1.1: Action**

Enter each corrective action separately that the agency will implement to address the finding and result in the agency being in compliance with the federal requirement using the “Add a Corrective Action” expansion menu.

**Standard to be met and method of evaluation**

Enter the identified compliance requirement or level of performance to be met to establish that the finding is resolved and enter the methods the agency will use to evaluate that it has resolved the finding.

**Planned start date**

Enter the projected start date for implementation of the corrective action using two digit month/ two digit day/ and four digit year. Example: 12/01/2010

**Actual start date**

Enter the actual date of implementation of the corrective action using two digit month/ two digit day/ and four digit year. Example: 12/01/2010

**Projected completion date**

Enter a projected date for each corrective action to be completed using two digit month/ two digit day/ and four digit year. Example: 12/01/2010.

**Actual completion date**

Identify the actual date on which the corrective action was completed using two digit month/ two digit day/ and four digit year. Example: 12/01/2010

**Quarterly update**

Enter the quarterly narrative update on the progress of the VR agency toward the implementation of corrective actions to resolve compliance findings into the text field.

**RSA state team comments**

RSA may enter narrative comment in the text field regarding the performance of the VR agency in the implementation of corrective actions taken toward the resolution of findings specified in the CAP and the effectiveness of those corrective actions in achieving compliance with the federal requirement.

**Resolved**

For use by RSA only. RSA is to select this option when a finding has been fully resolved and the agency has met the federal performance requirement.

**Transmittal of the Report**

The CAP must be developed within 45 days of the published 107 Monitoring Report and submitted into the RSA-MIS. The Quarterly Progress Reports must be developed and entered into the RSA-MIS within 30 days of the end of the subsequent full quarter of the federal fiscal year and then updated quarterly until resolved.