

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

POLICY DIRECTIVE

RSA-PD-O2-02

DATE: October 17, 2001

ADDRESSEES: STATE VOCATIONAL REHABILITATION AGENCIES (GENERAL)
STATE VOCATIONAL REHABILITATION AGENCIES (BLIND)
CLIENT ASSISTANCE PROGRAMS
REGIONAL REHABILITATION CONTINUING EDUCATION
PROGRAMS (RRCEPS)
AMERICAN INDIAN VOCATIONAL REHABILITATION SERVICE
PROGRAMS
RSA SENIOR MANAGEMENT TEAM

SUBJECT: Request for resubmission of the Quarterly Cumulative Caseload Report (Form RSA -113, OMB Number: 1820-0013) for the fourth quarters of FY 1998 and FY 1999 using the revised format contained in RSA-PD-99-08.

BACKGROUND: A comprehensive review of data collected on the RSA-113, Quarterly Cumulative Caseload Report, has identified widespread and significant problems with data submitted for FYs 1998 and 1999. We believe that many, if not most, of the identified problems can be attributed to ambiguities in the instructions, the lack of self validation items (cross checks) internal to the form that had been deleted in our attempt to streamline the form for FYs 1998 and 1999, and the omission of a critical data item. The necessary internal validation data items and the missing data item were reintroduced in the latest RSA-113 revision (RSA-PD-99-08) for reporting for FYs 2000 and beyond.

We found that 34 of 80 agency submissions for FY 1998 and 1999 show clear statistical anomalies that will require resubmission of data to correct. In addition, there is another group of agencies that submitted data that were internally consistent on the form but that misinterpreted the meaning of the items on the form in ways that will require resubmission to correct. These agencies are currently being identified through a detailed review of the fourth quarter submissions for all 80 agencies for both FY 1998 and FY 1999. The overall result is that considerably more than half of all agencies will be

required to resubmit fourth quarter RSA-113 data for FY 1998 and FY 1999.

We communicated the problems articulated above to the Office of Management and Budget (OMB), and discussed the following course of action and its rationale. OMB assured RSA that it has the authority to require the resubmission of those reports determined to be inaccurate, and to do what is necessary to ensure the integrity of the RSA-113 database.

We believe that it could take several resubmissions by each agency with reporting problems in need of correction to fully resolve all the problems if the RSA-PD-97-03 format used for the original submission of FY 1998 and FY 1999 RSA-113 data is used for this resubmission request. On the other hand, we believe that using the latest approved version of the RSA-113 form (as described in RSA-PD-99-08) for the resubmission requested in this PD will significantly improve the overall quality of the data base and make processing of the resubmitted data easier and more controlled from the RSA perspective. We believe that using the more complete RSA-PD-99-08 version of the RSA-113 form to resubmit the data will likely result in lower overall burden by resulting in a complete, correct submission with fewer complications and fewer attempts at resubmission. Agencies will only be requested to correct the submissions for the fourth quarter, and not the first through third quarters, since the counts on the fourth quarter form are cumulative and reflect totals for the entire year.

In order to build a more complete and accurate RSA-113 database for FY 1998 and FY 1999, we are asking all agencies to resubmit RSA-113 data using the new RSA-PD-99-08 format even when the original FY 1998 and FY 1999 agency submissions appeared to be correct. Resubmission by all agencies is necessary to fill in the missing data inadvertently omitted from the RSA-PD-97-03 version of the form. As with the agencies needing to submit corrected data, we are requesting all other agencies to resubmit only the fourth quarter reports for FYs 1998 and 1999 using the newer current format. This will allow RSA to maintain continuity for a number of important long standing measures which were inadvertently severed when the RSA-PD-97-03 version of the form was introduced for FY 1998 and 1999 reporting. This request would represent an additional burden on State agencies that initially submitted data that was correct by RSA-

PD-97-03 standards, but we believe these resubmissions are critically important to maintaining a complete and accurate national database.

**POLICY
STATEMENT:**

All state VR agencies are requested to resubmit the RSA-113 fourth quarter reports for FYs 1998 and 1999 using the RSA-PD-99-08 version of the RSA-113. It is requested that these reports be submitted as soon as possible, but no later than November 30, 2001.

If you have any further questions, please call Patricia Nash at 202-205-9412 or e-mail her at patricia.nash@ed.gov.

**CITATIONS
IN LAW:**

Sections 7(11), 13, and 101(a)(10) of the Rehabilitation Act, as amended, and the Paperwork Reduction Act of 1995 of 1973, as amended.

**CITATIONS IN
REGULATIONS:**

34 CFR 361.5(b)(15), .38 and .40.

**EFFECTIVE DATE
OF POLICY:**

Immediately

**EXPIRATION
DATE:**

September 30, 2002

**INQUIRIES
TO:**

RSA Central Office (202-205-9412) or Regional Offices.

Joanne M. Wilson
Commissioner

cc: CSAVR
NORP
NAPAS