REHABILITATION SERVICES ADMINISTRATION

ReThink VR Performance Plan

QUARTERS ENDING JUNE 30, 2019 – JUNE 30, 2020

FINAL OCTOBER 30, 2019

Priority 1: Performance Data

Action 1: Support State VR Agency Implementation of the Current and Revised RSA-911

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Provide technical assistance (TA) and training to State VR agencies to assist them in collecting and reporting accurate data on the current RSA-911 (through June 30, 2020) and the revised RSA-911 (beginning July 1, 2020).	RSA will partner with WINTAC to provide and post an eight-part webinar series on data collection and reporting changes from PD 16-04 to PD 19-03 and the new requirements.	Improved data reporting resulting in more accurate VR program data for use by RSA and VR agencies.	Ongoing through 6/30/20
Provide TA and training to VR agency staff and other stakeholders at national conferences related to the revised RSA-911 to improve timeliness, accuracy and completeness of data reported to RSA.	Data Unit staff will present at multiple conferences and conduct calls to reach more stakeholders	VR agencies will show improvement on the submission of timely, complete, and accurate data to RSA.	Ongoing through 6/30/20

Action 2: Support State VR Agency Use of RSA-911 Data for Performance Accountability Purposes

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Provide TA and training to VR agencies on how to use RSA-911 data in making informed decisions about service delivery, VR program improvement, and performance accountability.	Continue to provide quarterly Data Dashboards to VR agencies. Solicit examples from State VR agencies related to how they have used the Data Dashboards for continuous improvement and share these examples with all State VR agencies.	VR agencies will report an increase in the use of Data Dashboards to assist in decision-making, resulting in improved performance in service delivery and accountability. Feedback will be gathered through various input mechanisms (e.g., Grantee Satisfaction Survey).	Quarterly through 6/30/20

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
RSA-911 data will be incorporated into the on-site monitoring reviews.	Maintain performance focus area in monitoring reviews. Refine process for Data Unit staff involvement in on-site reviews.	VR agencies will provide feedback on the usefulness of the TA provided by Data Unit staff during monitoring visits as part of the evaluation of the monitoring process. Feedback will be gathered through various input mechanisms (e.g., Grantee Satisfaction Survey).	Ongoing through 6/30/20
Conduct TA calls with VR agencies on WIOA performance indicator data (e.g., Measurable Skill Gains) and other performance data (e.g., timeliness of eligibility determinations and IPE development).	Provide PY 2017 and 2018 MSG-related data to each VR agency. Discuss data, performance, successes, and areas for improvement with data collection, reporting, and VR service delivery.	VR agencies will provide feedback on the TA provided by RSA. RSA will determine the effectiveness of this effort through review of the accurate reporting of the new performance accountability measures. Feedback will be gathered through various input mechanisms (e.g., Grantee Satisfaction Survey).	Ongoing through 6/30/20

Action 3: Increase Transparency of State VR Agency and National RSA-911 Data

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Publicize State VR data and national RSA-911 data.	RSA will— • Post quarterly Data Dashboards on RSA's website; • Post Quick Data Tables on RSA's website using monitoring data tables; • Highlight success stories of VR agencies that make considerable improvement in specific performance areas (e.g., MSG); and • Conduct a call with VR agencies and stakeholders when PY 2018 WIOA Annual Reports are published.	Transparency of national and State data will assist VR agencies in assessing their performance and setting targets for improvement.	Ongoing through 6/30/20
Establish a Performance Data Work Group	RSA will— • Organize a work group of Federal and State data experts to identify what the VR program values related to performance (defining success) and develop ways RSA and VR agencies may use data to help assess VR program performance.	RSA and VR agencies will have a shared vision of VR program success and VR agencies will have tools that will assist them with data analysis/program evaluation.	Ongoing through 6/30/20

Priority 2: Flexibility and Reduction of Burden

Action 1: Prior Approval Flexibilities

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Explore prior approval flexibilities to reduce burden for grantees and OSERS staff.	RSA will continue to consider TA options, and will develop resources as appropriate.	Reduction in burden for State VR agencies and RSA staff. Reduction in the number of prior approval compliance findings during monitoring over the monitoring cycle.	12/31/19

Action 2: Pre-Employment Transition Services Flexibilities

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Explore flexibilities in the use of the reserved funds for pre-employment transition services.	RSA will consider TA options, and will develop resources as appropriate.	The number of States (VR agencies) that will meet the reserve requirement will increase and students with disabilities will be more fully supported in participating in the five required activities.	12/31/19

Action 3: Cancellation Fees Flexibilities

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Explore flexibilities related to charging of cancellation/no-show fees to grant award funds.	RSA will continue to consider TA options, and will develop resources as appropriate.	VR agencies will have the information needed for determining allowability of cancellation costs or costs in which no services are rendered, and when they may be paid with VR program funds.	12/31/19

Action 4: RSA-2: Reduction in Burden

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Explore revising RSA-2 ICR to update language in accordance with WIOA, reduce burden associated with reporting data elements no longer needed, and incorporate SF-425 data elements into RSA-2 to streamline reporting of VR financial data.	Publish revised RSA-2 ICR in the Federal Register. RSA will consider TA/training options, and will develop resources as appropriate.	Financial reporting will be streamlined by eliminating the need for the SF-425, reducing the burden for both State VR agencies and RSA.	12/31/19

Action 5: RSA-7OB: Reduction in Burden

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Explore revising RSA-7OB ICR to streamline the reporting burden on State VR agencies administering the Independent Living Services for Older Individuals Who Are Blind grants.	Publish revised RSA-7OB ICR in the Federal Register. RSA will consider TA/training options, and will develop resources as appropriate.	Reduction in burden for VR agencies administering the program. Data reported will be more consistent due to clarifications, providing a more accurate picture of the program's performance.	12/31/19

Priority 3: Technical Assistance and Dissemination

Action 1: Formal Technical Assistance

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Pursue joint issuance of Frequently Asked Questions (FAQ) with DOL Wage and Hour Division describing the requirements in Section 511 of the Rehabilitation Act.	Post FAQ on RSA and WHD websites.	Improved implementation of Section 511 requirements by both VR agencies and Section 14(c) certificate holders.	12/31/19
Continue to explore intent and interpretation of Section 511(a) regarding determination of eligibility/ineligibility for the VR program.	Reviewing Section 511(a), as well as possible TA approaches.	Consistent application of the requirements to determine ineligibility/eligibility for youth under Section 511.	12/31/19
Provide TA on Section 105 of the Rehabilitation Act, to increase the effectiveness of the partnership between the State VR agency and the State Rehabilitation Council (SRC) and to reflect changes in representation of the AIVRS program on SRC and other statutory/regulatory citations.	Reviewing Section 105, as well as potential TA options.	Full representation on the SRCs of all stakeholders in the VR program.	03/31/20
Explore flexibilities for State VR agencies in providing out-of-state services to meet disability-specific needs of individuals with disabilities, particularly in postsecondary education.	Reviewing statute and regs governing out-of-state services, and considering development of appropriate TA vehicle(s).	Clarification will assist VR agencies to meet the individualized needs of participants with disabilities more effectively.	12/31/19
Provide TA on the provision of post-employment services to individuals with disabilities and how such services are to be reported on the RSA- 911.	Reviewing statute and regs addressing post-employment services. Considering development of appropriate TA vehicle(s).	VR agencies will provide post-employment services in an appropriate and more consistent manner, and will revise policies to reflect this TA and the reporting requirements.	12/31/19

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Pursue issuance of joint Technical Assistance Circular (TAC) on WIOA Performance Accountability, in partnership with ETA and OCTAE.	Work with Federal partners on TA development and dissemination approach.	Increased understanding by the core workforce development programs for the process to negotiate levels of performance and sanctions, as appropriate.	12/31/19
Pursue issuance of joint Technical Assistance Circular on PY 2020-2023 WIOA Unified/Combined State Plans, in partnership with ETA and OCTAE	Work with Federal partners on TA development and dissemination approach.	Core workforce development programs will understand the requirements for submitting their plans.	12/31/19

Action 2: Training to Address Knowledge Gap

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Develop a series of webinars/teleconferences to highlight TA materials scheduled for issuance by ED and DOL.	Using capacity provided by NCRTM and RSA's TA centers, RSA staff will consider, and if appropriate develop, TA vehicles to describe the requirements outlined in the TA materials issued.	The knowledge gap will be reduced through the participation of VR agency staff and stakeholders in these webinars and teleconferences, leading to more effective management of programs and implementation of program requirements.	Ongoing through 6/30/20
Provide TA and professional development to State VR agency leadership, including new directors.	RSA to provide training to VR directors during the Leadership Training at the Fall 2019 and Spring 2020 CSAVR conferences.	Increased knowledge attainment for new VR leadership and managers, which will foster improved performance of VR agencies in serving individuals with disabilities.	6/30/2020

Action 3: PY 2020-2023 WIOA Unified/Combined State Plans

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Develop training for State agency staff responsible for submitting the VR services portion of the Unified or Combined State Plans under WIOA, including the common elements of those plans, as well as training for RSA staff responsible for reviewing the plans.	RSA will— • Develop training for RSA staff; • Develop and deliver training for State VR agencies	All State Plans will be submitted on time. They will be reviewed for accuracy, and will be approved by RSA staff. RSA will provide consistent, complete, and accurate TA to agencies to improve the effectiveness of their State Plans.	3/31/20

Action 4: Technical Assistance for the TPU Discretionary Grants

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Explore and develop new priority areas for the VR TA centers.	RSA will receive public comment via an NPP in Federal Register. Publish the NFP and NIA in Federal Register to solicit applications.	VR agencies and stakeholders will receive TA in the identified priority areas of need, leading to improved performance of the VR program.	6/30/20
Explore and develop new priority for the RSA/OSEP TA Center on Transition.	RSA and OSEP will publish an NIA in Federal Register to solicit applications.	VR agencies and SEAs will be better prepared to assist students and youth with disabilities as they transition from school to postsecondary education and career opportunities.	12/31/19

Action 5: Technical Assistance for the Randolph-Sheppard Vending Facilities Program

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Rethink and pursue update of Policies and Procedures for Arbitration—last updated in 1974.	RSA will revise and publish proposed Arbitration Policies and Procedures for public comment in the Federal Register, and then publish final Policies and Procedures in the Federal Register.	Arbitration requests will be handled more expeditiously in accordance with established policies, procedures, and timelines.	3/31/20
Consider the development of TA for the Randolph-Sheppard priority related to food services.	RSA will determine the appropriate TA approach and move forward.	Clarification for SLAs and federal departments in applying the blind vendor priority in vending facility operations, leading to more opportunities for blind vendors.	6/30/20
Update Randolph-Sheppard program technical assistance documents.	RSA will review previously issued documents to consolidate and update information related to use of set-aside and VR program funds.	Clarification of the use of set-aside and VR funds within the R-S program	6/30/20

Priority 4: Monitoring

Action 1: FFY 2018 VR Monitoring

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Issue and publish all FFY 2018 monitoring reports.	RSA will complete and issue outstanding final FFY 2018 monitoring reports.	Publication of the FFY 2018 monitoring reports will assist monitored VR agencies in identifying and correcting compliance issues, and in using TA to improve performance.	3/31/20

Action 2: FFY 2019 VR Monitoring

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Rethink and streamline FFY 2019 monitoring activities.	• MTAG will be targeted and will have fewer focus areas. Modified question format, and a streamlined report template will be developed; • Utilization of off-site and on-site monitoring; and • Target earlier completion and issuance of final reports. • Stakeholder input will be obtained on proposed changes. • RSA will update and publish chart of findings.	VR agencies will receive monitoring reports that will assist in identifying and correcting compliance issues, and in using TA to improve performance.	3/31/20

Action 3: Rethink VR Monitoring

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
RSA will streamline and revise monitoring of State VR agencies for FFY 2020 monitoring.	RSA will— • Gather input from CSAVR/NCSAB/SRCs and CAPs in teleconferences; • Review other monitoring protocols within the Department; • Implement improved online corrective action plan to allow for individual corrective actions to be submitted; • Analyze input and develop a blueprint for a revised MTAG, including a process for conducting exit interviews; and • Issue and publish a revised MTAG.	Streamlining the monitoring process will improve timeliness and effectiveness of reports, resolution of corrective actions, and lead to greater value for VR agencies in the management and performance of their programs.	Ongoing

Action Step 4: Monitoring—The American Indian Vocational Rehabilitation Services (AIVRS) Program

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Develop monitoring protocol to use for site visits in FFY 2020.	RSA will— • Revise, pilot test, and evaluate the monitoring protocol; and • Conduct site visits to two grantees using the new protocol.	AIVRS programs will benefit from TA and monitoring using a uniform protocol to assist grantees in identifying compliance issues and barriers to improve program performance and meeting or exceeding project measures and outcomes.	6/30/20

Action Step 5: Monitoring—the Randolph-Sheppard Vending Facilities Program

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Update monitoring protocol to use for site visits in FFY 2020.	RSA will— • Develop, pilot, and evaluate an updated monitoring protocol; and • Conduct on-site monitoring visits to two SLAs.	The monitoring process of State licensing agencies will improve compliance with the Randolph Sheppard Act and regulations, address TA needs of SLAs, mitigate disputes between SLAs and the Blind Vendors Elected Committees, ensure program and financial accountability, leading to improved program performance.	6/30/20

Priority 5: Communication

Action 1: Improve Communication through Dissemination of Technical Assistance

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Rethink and revise the presentation of TA and information materials on the RSA.ed.gov and ed.gov websites to be more efficient and effective for VR stakeholders.	RSA will— • Assess, update, and develop the TA and information available on the website and identify gaps and additional needs (i.e., FAQs and MythBusters); • Update and disseminate the Orientation for New State VR Directors; and • Develop strategies for identifying and disseminating "promising practices" in collaboration with NCSAB and CSAVR and the Rethink work group.	Improve the availability and functionality of the RSA website as measured by the number of hits and downloads on the rsa.ed.gov website.	Ongoing 6/30/20
Assess TA needs of VR agencies and strategies for dissemination.	RSA will analyze the Department's Grantee Satisfaction Survey results and develop a plan to address VR agency needs identified by the survey.	Future Grantee Satisfaction Survey results will improve as a result of identification of TA needs and effective dissemination practices.	Ongoing 06/30/20

Action 2: Timely and Consistent Communication of Information

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Review and revise current processes related to the provision of TA and policy to State VR agencies.	RSA will— • Revise procedures to monitor the timely and accurate delivery of TA and policy to VR agencies and stakeholders; • Train RSA staff on the revised procedures • Ongoing identification of staff training needs.	Increase staff knowledge and consistency of TA and policy across RSA.	Ongoing 3/31/20

Action 3: Enhance External Communication

What is the goal?	How does RSA plan to reach the goal?	Anticipated Effect	Anticipated Completion
Explore approaches to improve engagement and communication with VR stakeholders.	RSA will— • Hold quarterly teleconferences with State agencies to exchange information, respond to questions, and to review trainings and related materials, as necessary. • Participate in regional meetings or other training venues, if invited and as resources permit; • Conduct teleconferences with SRCs and Client Assistance Programs to obtain input on how to better support them in their respective roles and strategies for improving the VR program; • Explore use of online national dialogues and other forums on topics of interest to VR agencies and other stakeholders; • Review available communication vehicles to reach the broadest audiences in coordination with the OSERS communication team; and • Develop a process for gathering and disseminating emerging practices.	Stakeholders will benefit from improved communication, obtain needed support and information, and perceive RSA as responsive to the stakeholders and individuals served by the VR program.	Ongoing 6/30/20