

DCL 23-04 Implementation Checklist

To help State VR agencies prepare for the implementation of the revised RSA-911 ([DCL 23-04](#)), which is effective July 1, 2024, the VRTAC-QM offers this checklist to State VR agency personnel who are responsible for RSA-911 data collection and reporting activities. This checklist is not exhaustive and we encourage you to access the [RSA-911 training series](#) developed in partnership with the Rehabilitation Services Administration (RSA) for further details on these requirements.

General Implementation

- Your agency understands general changes in the RSA-911 (e.g., additions/deletions of Data Elements and codes, reporting instruction changes, code value changes) and how they will impact the role of VR counselors and agency reporting.
- Your case management system has been updated and is capable of meeting deadlines for the implementation of DCL 23-04 in PY 2024 (the first quarterly report is due November 15, 2024).
- Your agency has revised its policy, procedures, and quality assurance/case reviews in response to DCL 23-04.
- Your agency has identified and addressed the training needs of VR counselors and other staff.
- Your agency understands RSA's correction procedures when errors are identified in your data and/or case management system.
 - Your agency is aware of changes in Data Elements that can be corrected and the modified instructions of those elements.
- Your agency has aligned its internal controls for data collection and reporting and its case management system with the latest [RSA-911 edit checks](#).
- Your agency has implemented the necessary internal control requirements outlined in [DCL 23-04](#) and [TAC 19-01](#), including processes to ensure accuracy, reliability, and validity of the data.

Reporting VR Services

- Your case management system accurately captures and reports all VR services, regardless of service delivery type, in the quarter that services are provided.
 - Provided by VR Agency Staff (in-house)
 - Provided through VR Agency Purchase
 - Provided by Comparable Services and Benefits Providers
- Your case management system accurately sorts all agency developed record keeping mechanisms for purchases, contracts, staff provided services, and comparable benefits into the RSA-911 service category that best fits its purpose and definition. Your agency monitors those services reported on the RSA-911 to ensure they present an accurate reflection of agency operations.
- Your case management system has a means of capturing and reporting new service Data Elements 409 through 414 related to home modifications.
- Your agency has a process for ensuring all services reported on the RSA-911 are services listed on the Individualized Plan for Employment (IPE), including Pre-ETS services necessary to reach the employment goal.
 - Your case management system is also able to identify which services are provided to eligible individuals only under an IPE.

Eligibility Determination

- Your case management system accurately conveys the outcome of eligibility determinations within new service Data Element 408 and correctly codes Data Element 354 with exit reason 7 when an individual exits as an applicant after being determined ineligible for VR services.

Pre-Employment Transition Services (Pre-ETS)

- Your case management system accurately captures and reports the required RSA-911 data elements for potentially eligible (PE) students with disabilities (SWD) and those who receive Pre-ETS as a participant under an IPE.
 - Reportable Individual (PE-SWD) vs. Participant
 - The CMS has the ability (internal control) to ensure that the 15% reserve is only available for cases identified for SWD.
- Your agency understands the reporting requirements for potentially eligible students with disabilities (SWD).
 - Potentially Eligible Students: Start date must be verifiable through supporting documentation.
 - SWD: Reporting should be updated when the individual no longer meets the state definition of a student with a disability.
- Your case management system accurately captures and reports the additional allowable services under an IPE (i.e., NOI) that can be charged to the 15% reserve requirement for Pre-ETS.
- Your agency has processes in place to ensure accurate tracking and reporting of each required Pre-ETS provided for each SWD, whether contracted services or services provided through group settings.
- Your agency understands the conditions and reporting method necessary to report that a potentially eligible student no longer meets the definition of a student with a disability (i.e. DCL 24-01).

Supported Employment (SE) Services

- Your agency understands when and how to use title VI SE funds and has implemented CMS internal controls, where possible, to prevent SE funds from being used inappropriately.
- Your case management system accurately captures and reports SE services, Customized Employment Services, and the use of title I and/or title VI funds.
- Your agency has processes in place to accurately exit a participant in competitive integrated employment in SE.

Post-Exit Employment Measures

- Your agency has policies and training, and internal controls, in place to ensure the *Reason for Exit* is accurately reported at all stages of the VR case.
- Your case management system accurately captures and reports the post-exit data elements.
 - Post-exit credentials and secondary credential special rule.
 - Unemployment Insurance (UI), State Wage Interchange System (SWIS), and other data sharing are implemented in full compliance with the terms of agreements.
- Your agency has data validation procedures in place to periodically confirm required elements of RSA-911 reporting through identification of required supporting documentation.

- Your agency has policies and procedures related to capturing accurate participant characteristics, supplemental wage information, when necessary, and additional performance data.
- Your agency receives UI wage records and has policies and procedures on other documentation of supplemental wage verification to report on the newly defined Effectiveness in Serving Employers indicator-Retention with the Same Employer.

Credential Attainment and Measurable Skill Gains (MSG)

- Your agency has the policies and procedures necessary for VR counselors to record accurate data for both indicators (i.e., [Credential Attainment Guide](#), [MSG Guide](#))
- Your agency has the necessary data analytic abilities to measure MSG progress during the program year.
- Your agency can analyze Credential Attainment among VR participants, identify discrepancies or under-reporting, and has developed agency specific training for counselors regarding Credential Attainment.

ETA-9169 WIOA Annual Report

- Your agency understands the structure, contents, and requirements of the ETA-9169 Annual report, including from where these data elements are pulled from your case management system.
- Blind and general agencies have a mechanism to evaluate their own agency data that is combined as title IV in the ETA-9169, to analyze progress, program improvement needs, and to make data-informed decisions.
- Your agency has a process for capturing expenditures required for the ETA-9169 Annual report that are not reported in the RSA-911 (e.g., RSA-17).
 - This includes Training and Career services provided by VR agency staff (in-house) and purchased services.
- Your agency has a process to validate the co-enrollment figure reported within the ETA-9169.