

Requirements for the Title I and VIB State Plan Attachment 4.11a



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Attachment 4.11(a) Requirements



Required Information in Attachment 4.11(a) to the Title I state plan and its title VI B supplement includes:

- I. the results of the CSNA describing the rehabilitation needs of individuals with disabilities residing within the state, particularly the vocational rehabilitation services needs of:
 - a. individuals with the most significant disabilities, including their need for supported employment;
 - b. individuals with disabilities who are minorities;

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- c. individuals with disabilities who have been unserved and underserved by the VR program; and
- d. individuals with disabilities served through other components of the statewide workforce investment system (other than the VR program), as identified by such individuals and personnel assisting such individuals through the components.

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- II. an assessment of the need to:
 - a. establish community rehabilitation programs (CRPs);
 - b. develop CRPs; or
 - c. improve CRPs within the state.

Suggested CSNA Report



CSNA Report is suggested as a permanent record of the agency's process and results, including:

- the information the agency sought;
- who was involved;
- the methods and sources used to collect the information;
- the results including 4.11a requirements;
- the services currently provided and the agency's performance;
- the service gaps identified; and
- the implications for the agency's State Plan.

Frequently Asked Questions about the CSNA



1. Is the CSNA an event or a continuous process?
 - According to 34 CFR 361.29(a)(1), the CSNA must be conducted every three years.
 - RSA has interpreted that to mean that a CSNA addressing all requirements and serving as the foundation for the state plan goals and objectives must be completed by the end of the third FY,
 - Regardless of whether it is conducted as a single event in one year or continuously over a three-year period.

Frequently Asked Questions about the CSNA



For those States that view the CSNA as a continuous process and conduct a portion of activities each year for three years, such a process provides opportunities to:

- address emerging needs;
- utilize assessments conducted by others; and
- collaborate with other partners in conducting a needs assessment

Frequently Asked Questions about the CSNA



- Such a process may also provide increased flexibility in scheduling CSNA activities.
- Regardless of whether a State conducts the CSNA as a single event every three years or continuously for a three-year period, the resulting identified needs are used to develop State Plan goals and VR policies.

Frequently Asked Questions about the CSNA



2. If a needs assessment is due this year, can state VR agencies and SRCs conduct a portion of the CSNA in each of the next three years as described in the response to question 1?
 - If an agency's CSNA must be conducted this year to be in compliance with the requirement that it be conducted every three years, the agency cannot conduct a portion of the CSNA activities over the next three years.

Frequently Asked Questions about the CSNA



- To do so would cause the agency to be out of compliance with the requirements of 34 CFR 361.29(a)(1).
- However, if an agency has three more years before the needs assessment is due, the agency can conduct a portion of the CSNA in each of the next three years.

Frequently Asked Questions about the CSNA



3. If an agency and SRC conduct a needs assessment in three one-year parts, are the results to be consolidated into one report or submitted as yearly updates?
 - When the State conducts the CSNA on a continuous basis over a three-year period, the State must include the CSNA results in Attachment 4.11(a) of the state plan as annual updates for each of the three years pursuant to 34 CFR 361.29(a)(2).

Frequently Asked Questions about the CSNA



4. How do you define “unserved” and “underserved”?

The Rehabilitation Act and its implementing regulations do not define these terms. The VR Needs Assessment Guide contains the following guideline:

- **Unserved individuals** are individuals who would be eligible for VR services but have not received VR services.
- **Underserved individuals** are those who do not receive equal access to VR services.

Frequently Asked Questions about the CSNA



Unserved and underserved individuals can include:

- racial and ethnic minorities;
- specific disability populations;
- people with disabilities who are low-income;
- veterans;
- certain age groups; and
- residents of a specific geographic area.

Conducting a CSNA



For more detailed and complete information on conducting a CSNA and constructing a summary for Attachment 4.11a:

- visit <http://www.infouse.com/CSNAguide/> ; and
- contact your TACE center.