

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section¹. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.**

The Vocational Rehabilitation Financial Report (RSA-17) collects data on the State Vocational Rehabilitation (VR) Services program activities for agencies funded under the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of the Workforce Innovation and Opportunity Act (WIOA). The Rehabilitation Services Administration (RSA) of the Office of Special Education and Rehabilitative Services (OSERS), U.S. Department of Education (Department) uses the data to evaluate and monitor the financial and programmatic performance of VR agencies. The RSA-17 captures:

- Federal and non-Federal administrative expenditures for the VR program;
- Federal and non-Federal expenditures for Services to Groups;
- Federal and non-Federal American Job Center Infrastructure expenditures;
- Receipt, use and/or transfer of VR program income;
- Financial data necessary to ensure Federal award requirements are met (e.g., those for match, maintenance of effort, and the reservation of funds for the provision of pre-employment transition services); and
- Obligations and disbursements that occurred during the period of the award.

The data collected via the RSA-17 are necessary to ensure Federal requirements imposed by the Rehabilitation Act and its implementing Federal regulations are satisfied. The attached document shows the applicable portions of the Rehabilitation Act that necessitate the reporting of the data collected by the RSA-17.

Section 13 of the Rehabilitation Act requires the Commissioner of RSA to collect and report information specified in Section 101(a)(10) to the Congress and the President in an Annual Report. In addition, section 131(a)(1) of the Rehabilitation Act requires RSA to enter into a Memorandum of Understanding with the U.S. Department of Health and Human Services (HHS) and the Social Security Administration (SSA) to exchange data of mutual importance related to individuals with disabilities served by the VR program. Much of the data held by RSA and exchanged with HHS and SSA, pursuant to section 131(a)(1) of the Rehabilitation Act, are those collected via the RSA-17.

The purpose of this Information Collection Request (ICR) is to request revisions to the existing RSA-2 data collection, known as the Annual Vocational Rehabilitation Program/Cost Report. With these revisions, the form is renamed the Vocational Rehabilitation Financial Report (RSA-17). The RSA-17 combines data elements from two other VR financial reports (SF-425 and RSA-2) to create a single comprehensive financial report. The changes to the RSA-2 data

¹ Please limit pasted text to no longer than 3 paragraphs.

elements were necessary to: (1) add data elements to implement amendments to the Rehabilitation Act made by title IV of WIOA (e.g., those related to services to groups and pre-employment transition services); (2) add data elements necessitated by the VR program's role as a core program in the one-stop service delivery system and the jointly-administered requirements of title I of WIOA (e.g., those related to one-stop center infrastructure costs and reporting periods); (3) incorporate VR program-specific financial data elements, previously reported on the SF-425, necessary to ensure VR agencies comply with program requirements (e.g., match and maintenance of effort); and (4) remove data elements that are duplicative of data collected in the RSA-911 Case Service Report.

Specifically, the following revisions to the RSA-2 form are being implemented in the RSA-17 in response to VR program changes made by WIOA's amendments to the Rehabilitation Act, as well as those related to jointly administered requirements under title I of WIOA:

1. Two data elements were added (RSA-17, 38) to require VR agency reporting of pre-employment transition services expenditures for services provided by VR agency staff only. This information is necessary to ensure that appropriate pre-employment transition services expenditures are included when States calculate the average cost for career and training services as reported on the WIOA Annual Program Report. The data elements added are:
 - Required and Coordination Pre-employment Transition Services Provided by Agency Staff Only;
 - Authorized Pre-employment Transition Services Provided by Agency Staff Only; and,
2. Seven Services to Groups data elements were added (RSA-17, 39) to the select services to groups categories already included in the RSA-2 in order to ensure reporting of expenditures for all services to groups categories. One services to groups data element was deleted (all other services to groups) resulting in a net of the following six services to group data elements.
 - Telecommunications Systems;
 - Special Services to Provide Nonvisual Access to Information;
 - Technical Assistance to Businesses;
 - Transition Services to Youth and Students;
 - Establishment, Development, or Improvement of Assistive Technology; and,
 - Support for Advanced Training.
3. One data element was added (RSA-17, 40) requiring VR agencies to report the total amount of American Job Center infrastructure expenditures paid with VR funds.

Other new data elements include:

- The reporting of additional new non-Federal expenditures applicable for maintenance of effort (MOE) but not match (RSA-17, 33).
- The disaggregation of Innovation and Expansion (I&E) expenditures into two categories: I&E Expenditures Supporting State Rehabilitation Council Resource Plan and I&E Expenditures Supporting Statewide Independent Living Council Resource Plan (RSA-17, 41).

The revisions to the RSA-2 form consolidate and streamline the reporting of required financial data for the VR program in the following ways:

1. The revised RSA-17 would eliminate the requirement for VR grantees to submit a separate Federal Financial Report (SF-425) for the VR program, beginning with the Federal Fiscal Year (FFY) 2021 VR awards and for all subsequent FFY awards. RSA has incorporated the relevant SF-425 data elements into the RSA-17 form to eliminate the need for a separate submission by VR agencies. Therefore, for the FFY 2021 VR grant awards, beginning on October 1, 2020, and for all subsequent FFY awards, the instructions for completing the SF-425 for the VR program (PD-15-05) will not be applicable. However, VR agencies must continue to submit SF-425s until a final report is submitted for the FFY 2020 VR awards (including for any FFY 2020 carryover funds expended in FFY 2021) and for all prior FFY awards. RSA believes that consolidating all financial reporting for the VR program into one report—the proposed revised RSA-17 in this ICR—will eliminate confusion that had been expressed by the VR agencies in the past. To date, RSA had been relying on the Comments fields of the SF-425 to obtain additional expenditure data specific to the VR program and required by the Rehabilitation Act. As proposed in this ICR, the revised RSA-17 would collect all financial data required by the Rehabilitation Act and necessary for RSA to ensure agency compliance with fiscal requirements related to match, maintenance of effort, and the reservation of funds for the provision of pre-employment transition services, thereby making the submission of the SF-425 no longer necessary.
2. VR grantees will no longer be required to include expenditures for the State Supported Employment Services program, previously reported in the RSA-2, in the RSA-17. Rather, State agencies must continue to submit the SF-425 to satisfy the State Supported Employment Services program financial reporting requirements.
3. Eight data elements that can be calculated using current RSA-911 data were removed from the RSA-2, Schedule I.2.
4. The following schedules were removed from the RSA-2:
 - a. RSA-2 Schedule II - Labor Hours, which required grantees to report the number of labor hours for agency staff who perform services for the VR program, has been eliminated because the information is no longer necessary to support allocation of training funds. With this change, RSA removes 10 previously required data fields.
 - b. RSA-2 Schedule III – Number of Individuals Served and Purchased Service Expenditures by Service Category has been eliminated because these data are currently being reported by VR agencies through the RSA-911, thereby removing 57 previously required data fields.

There are 59 data elements reported per submission on the SF-425 form, including comment fields for additional data elements, and 94 data elements reported in the current RSA-2 form. Therefore, for both reports, the combined total is 153 data elements. The number of data elements in the proposed revised RSA-2 is 67 when excluding fields where data entry is not required. Therefore, the proposed revised RSA-2 in this ICR reflects a net reduction of 56 percent in the number of data elements that will be reported.

In order to calculate VR financial data on a Federal Fiscal Year and a Program Year basis for purposes of Rehabilitation Act and title I of WIOA reporting, State VR agencies must submit the RSA-17 form, beginning with the VR awards issued on or after October 1, 2020, on a quarterly

basis. The increase in burden cost is mostly attributable to the increased frequency of reporting from semiannual to quarterly in order to comply with the WIOA Program Year (PY) reporting requirements. Grantees were already submitting SF-425 reports twice per year and the RSA-2 annually. Therefore, the total reporting burden will only result in one additional quarter of reporting.

In addition to the above-specified proposed revisions to the RSA-2 form, the Department also proposes to add clarifying text to the instructions for line 15 that would clarify how the calculation will be done to determine whether a State has complied with the statutory requirements in sections 110(d)(1) and 113(a) of the Rehabilitation Act to reserve at least 15 percent of its VR grant amount for the provision of pre-employment transition services to students with disabilities. Specifically, we propose to add clarifying text in these instructions for line 15 of the RSA-17 to explain that RSA will evaluate a State's compliance with the requirements of sections 110(d)(1) and 113(a) of the Rehabilitation Act by determining, *based on a State's matched funds*, whether a State reserved *and* expended at least 15 percent of the State's 4th quarter grant award amount or at least 15 percent of the amount of Federal funds that it had matched by the end of the FFY of appropriation, whichever is less. We believe this proposed clarification will address the numerous inquiries we continue to receive from VR agencies since the requirements took effect with the amendments made to the Rehabilitation Act by WIOA.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The RSA-17 is completed by State VR agencies electronically (see #3 below for more information). The RSA-17 is designed to collect financial information regarding how VR grant funds provided to State VR agencies and the required non-Federal share are spent. RSA uses these data to:

- Assist with setting agencies' VR goals and determining whether those goals are being achieved;
- Determine the average cost of career and training services provided by VR programs, as required by title I of WIOA;
- Provide information necessary for the completion of the Department's annual budget request;
- Respond to inquiries from Congress, other Federal agencies, States, organizations, and private individuals;
- Respond to audits conducted by the Department's Office of Inspector General and the General Accountability Office; and
- Assess grantee compliance with the fiscal requirements contained in the Rehabilitation Act.

In addition, when these data are analyzed in conjunction with data collected through other instruments (e.g., RSA-911), RSA can assess VR agencies' accomplishments and monitor fiscal requirements and practices. This assessment allows RSA to identify areas in need of more technical assistance or review.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration given to using technology to reduce burden.

RSA has a Management Information System (MIS) that agencies use to access the data collection directly through the internet using the following URL: <https://rsa.ed.gov>. All VR agencies have submitted their RSA-2 data electronically into the MIS since FFY 2010.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The RSA-17 is the only source of data that will provide RSA with detailed VR grant award financial data. The proposed revised RSA-17 in this ICR would eliminate the need for semiannual submission of the SF-425 reports for the VR program by 78 agencies. Additionally, as indicated above, data elements that can be obtained through the revised RSA-911 have been eliminated from the RSA-17.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

The collection of information does not involve small businesses or other small entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

In order to calculate VR financial data on an FFY basis (October 1-September 30) and a PY basis (July 1 – June 30) for purposes of Rehabilitation Act and title I WIOA reporting, the data must be submitted quarterly. The RSA-17 data collection could not be less frequent than quarterly and still permit RSA to meet the statutory reporting requirements because semiannual reporting periods (e.g., April 1 – September 30) would cross over two different program years.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

With regard to reporting frequency, see response to question 6 above. There are no other special circumstances that cause the RSA-17 to be conducted according to the bullets above.

- 8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

The 60-day Information Collection Request (ICR) for the RSA-17 was published in the *Federal Register* on February 12, 2020 (85 FR 7980). This is the request for the 30-day Federal Register notice inviting public comment. RSA's response to comments received during the 60-day ICR is included in Appendix A.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

N/A

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be

circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

N/A

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.

No payment or gift will be provided to respondents, other than remuneration of grantees.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.² If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

The data to be collected on the RSA-17 report are not confidential or personally identifiable. The data only include VR agency financial information (i.e., VR program expenditures) and do not include any personal information other than the signature block for the submitting official.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation**

² Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Because the proposed revised RSA-17 in this ICR incorporates VR program-specific fiscal data elements that previously had been collected via the SF-425, VR agencies will no longer be required to submit the SF-425 forms for VR awards issued after October 1, 2020. The burden estimate for submission of the SF-425 form is 1.5 hours. Because semiannual SF-425 reports will no longer be required, VR agencies will realize an average annual reduction in reporting burden of three hours. There are currently 78 VR agencies. Therefore, the total burden reduction resulting from discontinued submission of SF-425 forms is 234 hours (three hours multiplied by 78 VR agencies). Using \$50.00 per hour for staff time, as is used in calculating the current RSA-17 burden, the total reduction in cost due to the elimination of the SF-425 submissions is \$11,700 (234 total hours multiplied by \$50.00 per hour), not including time needed to compile the information.

The information collection burden for the current RSA-2 form was estimated to be 320 hours for the 80 respondents submitting one report each per fiscal year (an average of 4.0 hours per submission). The total cost burden to the VR agencies was estimated to be \$16,000 (320 hours multiplied by \$50.00 an hour). When using adjusted figures due to a reduction in the number of VR agencies to 78, the total number of reporting hours is 312 (4 hours multiplied by 78 VR agencies) and the total estimated cost is \$15,600 (312 total hours multiplied by \$50.00 per hour) or \$200 annually per agency (\$15,600 divided by 78 VR agencies).

Because of the substantive nature of the changes to the RSA-17 (formerly the RSA-2), RSA provided a copy of the proposed revised RSA-17 form to eight VR agencies and requested they provide estimates of the time it would take to complete the form and the classification and hourly cost for the staff time required. Respondents indicated that the average time necessary to compile and submit the information was 32.67 hours per submission. The estimated hourly cost for staff time was \$39.88. To enable an accurate comparison when calculating the proposed burden, RSA used \$50.00 per hour as the cost for staff time, the amount used to calculate the staff burden for

the current RSA-2. Therefore, submission of the revised RSA-17 is estimated to be \$1,633.50 (32.67 hours multiplied by \$50.00 per hour). VR grantees would submit an average of four RSA-17 forms annually. The total cost per agency is estimated to be \$6,534 (\$1,633.50 cost per submission multiplied by 4 submissions). The total cost for all 78 VR agencies is \$509,652 (\$6,534 multiplied by 78 VR agencies). The cost estimates included in the analyses above do not include savings resulting from VR agencies not having to submit SF-425 reports.

It is important to note that the proposed addition of the clarifying text in the instructions for line 15 does not change the burden on States associated with completing the proposed revised RSA-17 because States are already responsible for complying with these statutory provisions. Therefore, our burden estimate in the Supporting Statement is unchanged. We propose to add the clarifying text to the instructions for line 15 only to make clear to States the calculation RSA will use to determine State compliance.

Exhibit 1: Estimated Burden and Respondent Costs

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
RSA-17	N/A	N/A	78	312	32.67	10,193	\$50.00	\$509,650

13. **Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)**
- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.**
 - **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden**

estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12**

Total Annualized Capital/Startup Cost : _____
Total Annual Costs (O&M) : _____
Total Annualized Costs Requested :

It is estimated that there will be no additional computer system costs for the inclusion of the VR program-specific SF-425 data elements into the proposed revised RSA-17. VR agencies have existing systems that are already reporting the requested financial data in the agency's semiannual SF-425 submissions.

There are 14 new data elements. Most of the new data elements require minimal disaggregation of existing data reported. For example, the proposed RSA-17 requires VR agencies to report expenditures for pre-employment transition services provided by agency staff only. The total must then be disaggregated into the following two sub-categories:

- a. Required and Coordination Pre-employment Transition Services Provided by Agency Staff Only
- b. Authorized Pre-employment Transition Services Provided by Agency Staff Only

Since October 1, 2014, VR grantees have been required to report all Federal expenditures for pre-employment transition services through RSA's adapted SF-425. This data element includes Federal expenditures for personnel costs for staff providing allowable pre-employment transition services. Reporting the aggregate amount of Federal pre-employment transition service expenditures is not a new reporting requirement. However, the proposed RSA-17 requires agencies to disaggregate those expenditures into the two categories of pre-employment transition service expenditures pursuant to the Rehabilitation Act. Since 2014, VR agencies have been required, through fiscal forecasting, to reserve the pre-employment transition services funds necessary to meet the needs of all students with disabilities needing required pre-employment transition services and coordination activities before an agency may pay for any authorized pre-employment transition services activities from the reserved funds (34 C.F.R. § 361.48(a)(3)). VR agencies using funds reserved for pre-employment transition services for authorized activities would already have systems to track expenditures for required, authorized, and coordination pre-employment transition service activities in order to meet the requirements of spending reserve funds.

The new data elements in the proposed RSA-17 may require VR agencies to add additional cost categories within their accounting systems to track the level of expenditures to be reported. However, most VR agency accounting systems are designed to accommodate additional cost reporting categories and the costs for adding the categories would be nominal.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

At the Federal level, RSA will revise the electronic version of the form using existing staff positions. We estimate that it will take 50 hours of time for a GS-14 Step 5 Information Technology Specialist to complete the necessary programming changes. With an hourly compensation rate of \$62.50 for the GS-14 position, the total VR cost for software development is \$3,125 (50 hours multiplied by \$62.50 per hour).

We anticipate it will take 1 hour annually for the Information Technology Specialist to open the RSA-17 forms in the RSA-MIS and update the form totals due to grant transfers, etc. Using the compensation rate specified above the annual cost would be \$62.50.

- 15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).**

The development of the RSA-17 was the result of program changes to streamline the reporting process and reduce the number of data elements being reported. Select data elements from the existing SF-425 form and the RSA-2 form were combined into a single VR financial report. This program change results in an increase of 9,873 burden hours based on the combined form that will be submitted quarterly, instead of annually. Additionally, the instructions contain substantive changes: remove reporting for data elements that are no longer required due to the implementation of the revised RSA-911 Case Service Report (OMB Control Number 1820-0508); remove RSA-2 data elements that are redundant; consolidate financial reporting data elements for the VR program; and add data elements in response to changes made to the Rehabilitation Act by the Workforce Innovation and Opportunity Act as implemented at 34 CFR 361 and 363. As a result of the revisions to this form, VR agencies will no longer be required to submit SF-425 reports for the VR program beginning with the FFY 2021 grant awards. The reporting burden for the SF-425 form is 1.5 hours per submission. Based upon 78 VR agencies submitting semi-annual SF-425 reports, the annual reduction in burden from not having to submit the SF-425 form is 234 hours.

The reporting burden for the current RSA-2 is 4 hours per submission. Based upon 78 VR agencies submitting annual RSA-2 reports, the annual reduction in reporting burden from not having to submit the RSA-2 form is 312 hours.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Data from the RSA-17 are used in monitoring State agency performance for the Annual Report to the Congress required by section 13 of the Rehabilitation Act and for the WIOA Annual Performance Reports necessitated by the VR program's role as a core program in the one-stop service delivery system and the jointly-administered requirements of title I of WIOA.

The proposed revised RSA-17 will be submitted quarterly by the State agency via RSA's MIS. These submissions in the MIS are reviewed by RSA staff and are either approved or sent back to the State agency for correction and/or revision. When the State agency's submittal has been approved, the form becomes publicly viewable in the MIS. The first submittal of the RSA-2 using this form will be due on January 31, 2021, for the FFY 2021 VR grant award.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The expiration date for OMB approval will be displayed.

- 18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.**

We made no exceptions to the items identified in the "Certification for Paperwork Reduction Act Submissions."