

SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION

- 1. Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. 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, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

This request is for a revision of the existing approved form (1820-0017).

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 current revisions to the form:

- Reduce the frequency of RSA-17 submissions from quarterly to semi-annually;
- Update the Uniform Guidance (2 C.F.R. Part 200) citations to include the OMB revisions that became effective November 12, 2020;
- Revise the form so the asterisks identify which line items are required, instead of which items are not required, in order to make the form consistent with the electronic version of the form in the RSA Management Information System;
- Revise the instructions to Section F to clarify that reporting of expenditures pursuant to an approved cost allocation plan is not required in Section F;

- Revise the title to Section G to read “Select Federal and Non-Federal Expenditures.” The word “select” was added to clarify that the total of Section G is not equal to the sum of all Federal and non-Federal expenditures (Note: The RSA-17 does not include the Schedule III RSA-2 reporting elements);
- Revise the title and instructions for line 15 (Expenditures Incurred for the Provision of Pre-employment Transition Services and Certain Other VR Services Needed to Access or Benefit from Pre-Employment Transition Services Provided by Agency Staff Only). The instructions now reference the Notice of Policy Interpretation (85 FR 11848 (Feb. 28, 2020));
- Relocate line 38a to 15a and revise the title and instructions to include other VR services that support access to and participation in pre-employment transition services;
- Relocate line 38b to 15b to reflect that only Federal expenditures for authorized pre-employment transition services should be reported;
- Revise the instructions for Establishment, Development, or Improvement of CRPs (line 39a) to reflect that data reporting is required;
- Revise the instructions for Date Report Submitted (line 43) to indicate that data entry is not required;
- Update Certification Section (I) to make it consistent with how the RSA-17 form is structured in the RSAMIS; and
- Include minor miscellaneous typographical edits.

State VR agencies will begin submitting the revised form for VR awards issued on or after October 1, 2023, on a semi-annual basis. Even though the reporting frequency is being reduced from quarterly to semi-annually, the reporting burden remains the same because the current analysis incorporates RSA-17 submissions, submitted during the current FFY, for VR awards in their carryover year. The burden analysis for the prior RSA-17 form did not account for the fact that most grantees (76 of 78) meet the requirements to carryover over Federal VR funds for an additional FFY. Therefore, when submitting RSA-17 forms on a quarterly basis, most grantees had to submit 8 forms during the FFY (4 for the current VR award plus 4 for the prior FFYs award that was in its carryover year). By reducing the frequency of reporting to semi-annually, the number of reports to be submitted per FFY would be 4. VR grantees will submit 2 RSA-17 forms for the current FFY and 2 RSA-17 forms for the prior FFY’s grant award, in its carryover year. Four submissions per FFY is consistent with the previously submitted burden estimate for the RSA-17.

**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;
- 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. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.**

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 previously reported RSA-17 data electronically into the MIS.

- 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.

- 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 provide adequate monitoring and oversight of the VR program and VR agency compliance with complex financial requirements, the RSA-17 data must be submitted at least semi-annually.

**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;**

This information is collected on a semi-annual basis.

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

The RSAMIS form is available at least 30 calendar days prior to the required submission date.

- **requiring respondents to submit more than an original and two copies of any document;**

Copies are not required due to electronic submission.

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

Data is maintained in the RSAMIS and the Department's grants management system (G5); therefore, grantees are not required to maintain the records in excess of the Federal requirements.

- **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;**

The information collected is not connected to a statistical survey.

- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

The information collected does not require statistical analysis or classification.

- **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**

The information collected is not protected by confidentiality and is available through FOIA.

- **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.**

The information collected does not include any proprietary trade secrets or other confidential information.

- 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.**

**Include a citation for the 60 day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60 day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received. For the 30 day notice, indicate that a notice will be published.**

A 60-day Federal Register notice published on April 24, 2023 (88 FR 24785). One public comment was received. The commenter noted that the instructions for line 15b, Authorized Pre-employment Transition Services, instructed grantees to enter the amount of allowable Federal expenditures for the provision of authorized pre-employment transition services. However, it is unclear whether the expenses being reported are limited to the funds required to be reserved to pre-employment transition services. In response to the comment, RSA revised the instructions for line 15 to clarify that "Expenditures reported in this section are only for activities charged to Federal funds reserved for pre-employment transition services." This clarification to the instructions resulted in no change to the reporting burden.

RSA will publish a 30-day Federal Register notice to allow public comment as part of this request for OMB approval of the revision of this information collection.

**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.**

SMPID requested comments from eight grantees that use the existing form and received no suggestions or recommendations for revisions.

- 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 was or will be provided to any respondents.

- 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.<sup>1</sup> 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. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.**

No assurances of confidentiality are being made to respondents.

- 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**

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<sup>1</sup> 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)

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 for this current information collection request. The statement should:**

- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- **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. 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 this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. 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. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

VR agencies indicated 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-17. 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 two RSA-17 forms annually for each VR grant award (current FFY and previous FFY carryover year). 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 approximately \$509,652 (\$6,534 multiplied by 78 VR agencies).

Even though the reporting frequency is being reduced from quarterly to semi-annually, the reporting burden remains the same because this analysis incorporates the RSA-17

submissions for the prior year's VR grant award, when a grantee meets the requirements to carryover that grant award (see response to question 1 for additional details).

**Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.**

**Estimated Annual Burden and Respondent Costs Table**

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 Annual 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
Annualized Totals			78	312	32.67	10,193	\$50.00	\$509,650

*Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.*

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** :

Because grantees are utilizing existing equipment to access the RSA-MIS for data entry, there are no additional equipment or maintenance costs. See response to question 12 for cost estimate.

- 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.**

The data is being collected through the RSA-MIS, an existing system, and therefore there are no additional costs.

- 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).**

**Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.**

	<b>Program Change Due to New</b>	<b>Program Change Due to Agency Discretion</b>	<b>Change Due to Adjustment in Agency</b>
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	Statute		Estimate
<b>Total Burden</b>			<b>N/A</b>
<b>Total Responses</b>			<b>N/A</b>
<b>Total Costs (if applicable)</b>			<b>N/A</b>

Even though the reporting frequency is being reduced from quarterly to semi-annually, the reporting burden remains the same because this analysis incorporates the RSA-17 submissions for the prior year's VR grant award, when a grantee meets the requirements to carryover that grant award (see response to question 1 for additional details).

The estimate related to the number of annual responses reflects: 1) the potential that every grantee could have to submit an RSA-17 form if they met the criteria to carryover the prior year's grant award and 2) that every grantee has to submit the form for the current FFY's award.

- 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.**

Upon submission of the forms by the grantees in the RSAMIS, the data is immediately publically available.

- 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.**

N/A

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

N/A