

**Information Collection Request for the Randolph-Sheppard Vending Facility Program  
RSA-15 data collection report (OMB No. 1820-0009)**

**Summary of Public Comments and Responses**

U.S. Department of Education  
Office of Special Education and Rehabilitative Services  
Rehabilitation Services Administration

On February 23, 2026, the U.S. Department of Education (Department) published a notice in the Federal Register, (91 FR 8470), seeking public comment on proposed changes to the RSA-15, Report of the Randolph-Sheppard Vending Facility Program, data collection instrument and the 60-day comment period closed on May 4, 2026. The Department appreciates each stakeholder's suggestions and comments on this Information Collection Request.

The Department received three public comments related to its proposed changes to the data collection instrument: Two comments were submitted by State licensing agencies (SLAs) and one organization serving the 51 SLAs submitted an attachment. In advance of the collection of public comments, the Department sent the SLAs proposed changes to the RSA-15 report. The commenters supported the proposed changes and provided additional feedback.

**Part I: Earnings and Employment**

*Line 5: Other Operating Expenses*

Comment Summary:

One commenter expressed concern about providing teaming partner profits, specifically related to making confidential proprietary and business information public.

Department Response:

This is not a change to the report and the profits included from the teaming partners are incorporated into the operating expenses overall; therefore, the teaming partner profits are not identified separately.

*Line 15: Vendor Person Years of Employment*

Comment Summary:

Two commenters requested that the Department consider revising the calculation of vendor person years of service to simplify the process.

Department Response:

This data is calculated by totaling the number of months worked by licensed vendors in the State and dividing by 12 and examples are provided. Some revisions were made in the instructions to clarify the process. The Department believes this data is necessary to gather a true average income of vendors. SLAs are encouraged to reach out to their Randolph-Sheppard liaison if they need technical assistance on this data point during the reporting period.

**Part II: Vending Facilities and Vendors**

Comment Summary:

All commenters believed that the proposed changes to Part II, Sections B and C of the report are meaningful changes that will bring more accurate reporting on the vending facility program, but they requested clarifying language in the instructions related to these sections, particularly with “locations.”

Department Response:

To address these comments, the Department provided three examples illustrating various scenarios with locations.

**Part IV: Program Expenditures By Source of Funds**

Comment Summary:

One commenter suggested consolidation of program expenditures to reduce inconsistencies in interpretation.

Department Response:

The Department consolidated language in two sections in Part IV to reduce burden and inconsistency in interpretation. The Department combined Lines 1 and 2 so that all types of equipment expenditures are reported on Line 1. The Department deleted line 3a. *Refurbishment of Facilities* given the Department determined that the collection of this data element is no longer necessary as expenditures in this category do not impact a State’s Federal match requirement or Maintenance of Effort. In addition, the Technical Assistance Circular published in FY 2024 related to allowable costs for vending facilities and equipment was referenced to provide a reminder for information that may assist in interpretation.

**Part VII: Vendor Training and Part VIII: State and Nominee Agency Personnel**

Comment Summary:

- Two commenters supported the consolidation of upward mobility training and national conference reporting in Part VII, as well as the similar consolidation of staff training reporting in Part VIII to reduce burden in reporting.
- One commenter requested that the Department further consolidate Part VII of the report to reduce inconsistencies in interpretation.

Department Response:

The Department further consolidated this part by deleting current sub-elements 1(c) number of individuals placed as employees in the vending facility program, and 1(d) number employed in allied food service occupations, into a new sub-element 1(c): Other to reduce burden in reporting.

**Other Comments**

Comment Summary:

- Two commenters requested that the Department provide updated instructions and training on the updated information well in advance of the data collection window to ensure that SLAs have the information they need to successfully complete the report.
- Examples given by the commenters include recorded webinars and a Frequently Asked Questions document prior to the opening of the reporting period.
- Two commenters provided feedback on the burden required to complete the report:
  - One commenter indicated that the net impact of the changes would be minimal as the consolidated sections would be offset by the additional time to compile data on the revised Part II, Section B.
  - The second commenter indicated that their burden was increased over the estimated time anticipated by the Department for respondents to complete the report given they do not have available software to help them compile data and thus must manually compile data to complete the report.

Department Response:

The Department has provided training sessions on the data collection instrument annually but is considering other options to provide technical assistance to the SLAs to ensure that all respondents receive the information they need to successfully complete the report, such as providing one or more recorded webinars. In addition, SLAs are encouraged to contact their Randolph-Sheppard liaison with any questions concerning data elements prior to the RSA-15 report submission. While the Department understands that there will be an increase in the time to collect information for Part II, Section B, based on the changes to the report, the Department believes that this increase should only impact the first year of the new reporting structure. The Department is aware that many SLAs are using software programs to assist with compiling the data.