

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.**

The Rehabilitation Services Administration (RSA) is requesting an extension with revisions to the Case Service Report (RSA-911) (OMB Control # 1820-0508), which expires on September 30, 2026.

The data collected through the RSA-911, as proposed, would continue those data elements required by the Rehabilitation Act of 1973 (Rehabilitation Act) and the Workforce Innovation and Opportunity Act (WIOA).

The proposed revision would add two new data elements:

- The first is the addition of the Middle Eastern or North African race category, as described in OMB's [Statistical Policy Directive 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity](#).
- RSA will also require the collection of a participant's *Highest Educational Level Completed at Program Entry*. This data element will allow the RSA-911 to better align with the *Participant Individual Record Layout (PIRL)* as defined within the ETA-9170, and will be used in statistical modeling that is required under section 116(b)(3)(viii) of WIOA.

RSA's proposed revision deletes 63 data elements related to comparable benefits that are not required by statute and are not necessary to be collected at the Federal level.

As a result, the proposed revision consists of 255 data elements compared to the current version of the RSA-911 that consists of 316 data elements.

Rulemaking is not involved with this proposed revision.

- 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.**

RSA uses the data collected through the RSA-911 to describe the performance of the VR and Supported Employment programs in the Annual Report to the Congress and the President as required by Sections 13 and 101(a)(10) of the Rehabilitation Act. RSA also uses these data to assess the performance of the VR program through the calculation of evaluation standards and performance indicators as required by Section 106 of the

Rehabilitation Act, which must be consistent with the common performance measures established in Section 116 of WIOA for the core programs of the workforce development system.

In addition, RSA uses data reported through this collection to support its other responsibilities under the Rehabilitation Act. Specifically, RSA uses data collected through the RSA-911 when conducting annual reviews and periodic onsite monitoring of VR agencies, required by Section 107 of the Rehabilitation Act to examine the effectiveness of program performance. Other important management activities, such as providing technical assistance, program planning, and budget preparation and development, are greatly enhanced through the use of RSA 911 data. In addition, RSA uses RSA-911 data in the exchange of data under a data sharing agreement with the Social Security Administration (SSA) and the U.S. Department of Health and Human Services (HHS) as required by Section 131 of the Rehabilitation Act. Finally, the RSA-911 is considered to be one of the most robust databases in describing the demographics of persons with disabilities in the country and, as such, is used widely by researchers in their disability-related analyses and reports.

- 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.**

The RSA-911 is an electronic text file that is created by extracting selected data elements from VR agency case management and financial management data systems. VR agencies submit comma-delimited text files to the U.S. Department of Education via the RSA Management Information System (RSAMIS) at rsa.ed.gov. Electronic transmission of the quarterly data file to RSA poses minimal processing burden on VR agencies.

- 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-911 is the only RSA data collection that requires data to be reported for each individual that applies for or receives VR or Supported Employment services, including students with disabilities who receive pre-employment transition services. These data otherwise are not collected by the U.S. Department of Education. In addition, the data collected through the RSA-911 are used to calculate the VR program's levels of performance under the performance accountability system required by Section 116 of WIOA, thereby minimizing burden on the States. Therefore, there is no duplication of data elements with any other reporting systems.

- 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.

This data collection does not have a significant impact on small businesses or small entities. However, grantees must secure the necessary data from all service providers and contractors, which may include small businesses or other small entities, to incorporate into required reporting formats.

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.

The VR program, which is one of the six core programs of the workforce development system, and the Supported Employment program are funded on a different cycle from the other five core programs. Both the VR and Supported Employment programs are funded on a Federal fiscal year (October 1 through September 30) basis pursuant to Sections 110, 111, and 603 of the Rehabilitation Act, whereas the other five core programs of the workforce development system are funded on a program year (PY) basis (July 1 through June 30). The other five core programs are the Adult, Dislocated Worker, and Youth programs authorized under Title I of WIOA and administered by the U.S. Department of Labor; the Adult Education and Family Literacy Act program authorized under Title II of WIOA and administered by the U.S. Department of Education; and the Employment Service program authorized under the Wagner-Peyser Act, as amended by Title III of WIOA and administered by the U.S. Department of Labor. Because the PY and the Federal fiscal year are offset by one quarter (July 1 through September 30), RSA needs quarterly RSA-911 data so that it can draw comparisons between both program and Federal fiscal years to satisfy statutory reporting requirements. If the RSA-911 were collected less frequently than quarterly, it would be incompatible with the performance reporting template – required under Title I of WIOA and jointly developed by the Departments – and RSA could not satisfy the WIOA performance accountability provisions for VR program, including the deployment of an objective statistical adjustment model that produces consistent and reliable predictions of VR agency performance.

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.

There are no special circumstances that require the collection to be conducted as discussed in the bulleted items 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.

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.

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.

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.

Notification of the 60 Day comment period was published in the Federal Register in Vol. 91, No. 98 on May 21, 2026, Docket No.: ED–2026–SCC–1717. RSA received 11 substantive comments from the 60-day comment period. As a result, RSA accepted some suggestions to improve clarity and consistency in service reporting. RSA also received requests for clarification of the implications of proposed changes. In addressing these questions and suggestions, RSA’s adjustments did not lead to a change in burden calculation.

RSA looks forward to any questions and comments that may arise from the 30 Day comment period and will respond accordingly.

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

RSA will not provide any payments or gifts to respondents in connection with this data collection.

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.¹ 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.

This ICR does not contain assurances of confidentiality as State agencies are the respondents. This proposed revision will continue to collect personal information, such as birthdates and social security numbers (SSNs). RSA’s policy has always been to maintain the confidentiality of individual service record data. The SSN is used to:

¹ 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)

1. For record control purposes to enable RSA to generate unduplicated data reports;
2. Enable the exchange of data with SSA and HHS, as required by Section 131 of the Rehabilitation Act;
3. Facilitate the VR agency's ability to obtain Unemployment Insurance wage data information required under WIOA.

Section 13 of the Rehabilitation Act reinforces RSA's confidentiality requirement by expressly stating that the RSA Commissioner is to assure that the identity of each person for whom information is supplied remains confidential.

The System of Records Notice (18-16-02) for the RSA-911 was published in the Federal Register on July 31, 2020, at <https://www.govinfo.gov/content/pkg/FR-2020-07-31/pdf/2020-16230.pdf>

The Privacy Impact Assessment for the RSAMIS was published on July 17, 2024, at: <https://www2.ed.gov/notices/pia/ras-mis.pdf>

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 sensitive questions included in the proposed data collection.

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.**

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

The annual burden for this information collection, specific to the VR program, is 8,878,461 hours for data collection and 7,488 hours for data reporting totaling 8,885,949 hours or an average of 113,922 hours per VR agency (i.e., the 78 VR agencies). The total cost of VR agency data collection and data reporting each year is an average of \$4,474,835.

Respondents to the RSA-911 are the 78 VR agencies in the United States, the District of Columbia, and its territories. The RSA-911 includes data elements required by Section 101(a)(10)(C) of the Rehabilitation Act, as amended by WIOA, and the joint performance accountability requirements in Section 116 of WIOA. The RSA-911 also includes data elements and definitions necessary to align with the WIOA Joint Participant Individual Record Layout (PIRL) (ETA-9170) and the Annual Statewide Performance Report (ETA-9169). The reporting burden estimates below represent only the costs associated with the data elements specific to the VR reporting requirements. The remaining portion of the burden for data collection attributed to the performance accountability system requirements in Section 116 of WIOA is reported under the ETA-9170 and ETA-9169 by DOL's Employment and Training Administration.

Data Collection:

Using a per data element calculation basis, RSA estimates that 80 percent (205 of the 255 data elements) constitute burden related to requirements of the VR and Supported Employment programs, while 20 percent (52 of the 255 data elements) of the burden is related to WIOA requirements. The 20 percent attributed to section 116 of WIOA is reported under the ETA-9170 and ETA-9169.

In PY 2024, VR agencies reported 412,587,309 (not null) data elements under the current version of the RSA-911, which included 316 data elements. Assuming two minutes per data element, RSA estimates that VR agencies incurred a total of 13,752,910 hours of burden to collect the current RSA-911 data. The proposed revision includes a net decrease of 61 data elements when compared to the current RSA-911. As a result, we expect VR agencies to report approximately 332,942,290 (not null) data elements.

Therefore, RSA decreased the expected burden for the revised RSA-911 to 11,098,076 hours. The portion of the total allocable to collecting VR specific data elements is 80 percent or 8,878,461 hours. Therefore, RSA estimates the total number of burden hours for the proposed revision to be an average of 28,457 hours per quarter.

We further estimate that VR counselors will complete 50 percent of data collection activities associated with the VR specific data elements and that rehabilitation technicians or similar personnel will complete the remaining 50 percent. Using an hourly compensation rate of \$44.57 for VR counselors (wage rate based on State-employed rehabilitation counselors plus the loaded wage factor), the estimated cost for 50 percent of the data collection burden (4,439,231 hours) is \$197,866,715. Using an hourly compensation rate of \$34.05 for VR rehabilitation assistants or equivalent positions (wage rate based on State-employed social and human service assistants plus the loaded wage factor), the estimated cost for the remaining 50 percent of the data collection burden is \$151,170,449. Consequently, we estimate that the total cost for all 78 VR agencies to continue to collect VR specific data elements to be \$349,037,164 or an average of \$4,474,835 per VR agency per year.

Data Reporting:

We estimate that the number of hours needed by each VR agency to report will remain 24 hours per quarter. As a result, the estimated total number of hours to report the data for all 78 VR agencies will remain 7,488 hours or 96 hours per year for each VR agency. Using an average hourly compensation rate of \$78.97 (based on data from the Bureau of Labor Statistics for State-employed Database Administrators and a loaded wage factor of 1.57), the estimated total cost for all 78 VR agencies to submit the RSA-911 data file on an annual basis is \$591,327. The estimated cost per VR agency is \$7,581.

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)
Data collection by VR Counselors	N/A	N/A	78	4	14,228	4,439,231	\$44.57	\$197,866,715
Data collection by VR Assistants	N/A	N/A	78	4	14,228	4,439,231	\$34.05	\$151,170,449
Data reporting by VR agencies	N/A	N/A	78	4	24	7,488	\$78.97	\$591,327
Annualized Totals	N/A	N/A	78	4	312	8,885,949		\$349,628,491

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.

All 78 VR agencies incurred burden resulting from adjustments made to their case management systems (CMS) to collect the current RSA-911 beginning in PY 2024. With this proposed revision, they will incur burden for activities associated with maintaining their systems to configuring two additional data elements and discontinue 63 others. The burden for maintenance will vary among the 78 VR agencies, dependent upon the sophistication of their information technology systems and whether the agency contracts with a vendor to operate their CMS. We estimate that each of the 78 VR agencies will require computer systems analysts for the task of maintaining their CMS. However, because the level of effort will vary, the burden estimates for this work by computer systems analysts has been broken down to reflect this complexity.

Of the 78 VR agencies, 55 use a CMS that they have purchased from a vendor who are responsible for maintaining and updating the CMS. We estimate that each of these 55 VR agencies will require one computer systems analyst, who is employed by the VR agency, to spend 20 hours maintaining the CMS for a total of 1,100 hours for all 55 agencies. Of the remaining 23 VR agencies that do not purchase a CMS from a vendor, we estimate that each agency will require 75 hours of staff time from a computer systems analyst to maintain the CMS. This results in a total of 1,725 hours for these 23 VR agencies. The total burden estimate for CMS maintenance is 2,825 hours. Using an hourly compensation rate of \$78.34 (based on data from the Bureau of Labor Statistics for State-employed Computer Systems Analysts and a loaded wage factor of 1.57), the estimated total cost is \$221,311 for CMS maintenance.

The table below provides an estimate of the burden hours and costs for maintaining the CMS of VR agencies. These maintenance costs will vary considerably based on many factors including availability of State IT programmers and contracting costs that would vary widely based on location.

Maintaining Case Management Systems	Number of VR Agencies	Hours	Hourly Rate	Total Cost
Using vendors	55	2,200	\$78.34	\$172,348
Using VR agency staff	23	3,450	\$78.34	\$270,273
Total	78	5,650	\$78.34	\$442,621

Since 80 percent of the proposed RSA-911 data elements are specific to the VR program, we used this as the basis for estimating the portion of the burden associated with the proposed revision. Thus, the estimated total cost for the VR program associated with CMS maintenance is \$442,621.

Total Annualized Capital/Startup Cost :\$0
Total Annual Costs (O&M) :\$442,621
Total Annualized Costs Requested :\$442,621

- 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 complete necessary database updates using existing staff positions. We estimate that it will take 24 hours of time from one GS-14 Step 4 Management and Program Analyst and 24 hours of time from one GS-14 Step 9 Information Technology Specialist to update RSA's database. With an hourly

compensation rate of \$75.85 for the GS-14 Step 4 position and \$87.35 for the GS-14 Step 9 position, the total cost is \$3,917.

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.

This question is answered more broadly within question 1, above. As it concerns the annualized cost to the Federal Government, with this proposed revision, RSA has estimated \$3,917 because we are proposing only minor changes to the RSA-911. As a result, RSA staff will not need extensive time to reprogram the RSAMIS, wherein VR agencies submit RSA-911 reports.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden		48 hours	
Total Responses		N/A	
Total Costs (if applicable)		\$3,917	

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.**

VR agencies will submit RSA-911 reports via the RSAMIS. RSA-911 reports must be submitted to RSA on a quarterly basis, no later than 45 days after the end of each quarter in accordance with the following schedule:

Quarter	Reporting Period	Report Due Date
1	July 1 – September 30	November 15
2	October 1 – December 31	February 15
3	January 1 – March 31	May 15
4	April 1 – June 30	August 15

Tabulations are generated to describe program related characteristics by VR agency and by specific groups (e.g., disability type and barriers to employment). There are 78 VR agencies and a large number of groups by which the data may be displayed.

The analysis of the data will provide demographics, relationships between variables, and program outcomes to assist in understanding and monitoring VR programs. Summaries of selected characteristics for all persons served, including those with significant disabilities, are published in the RSA Annual Report to Congress. RSA will also aggregate the relevant RSA-911 data to develop the WIOA Annual Statewide Performance Reports for VR programs and publish these reports following each PY. The data are also used for preparing monitoring tables, determining levels of performance, and for researchers who conduct analyses using deidentified datasets.

The estimated timeline for implementation is included in the table below:

Date(s)	Description
May 15, 2026 – July 15, 2026	60-day comment period
August 7, 2026	RSA develops responses to comments and completes clearance process
August 10, 2026 – September 10, 2026	30-day comment period and OMB review
October 2026	RSA issues Policy Directive extending with revisions the RSA-911
July 1, 2027	VR agencies begin collecting revised RSA-911 data for PY 2027
November 15, 2027	Deadline for VR agencies to submit first quarterly report for PY 2027

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.

RSA is not seeking approval to not display the expiration date for this data collection.

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

There are no exceptions to the certification statement identified in Item 20 of OMB Form 83-1.