

OMB 83-1 SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The current Vocational Rehabilitation (VR) Case Service Report is used to collect annual individual level data on the individuals that have exited the VR program, including individuals who have received services with funds provided under the Supported Employment program. Sections 101(a)(10) and 607 of the Rehabilitation Act of 1973 (Act) contain data reporting requirements under the VR program and Supported Employment program, respectively. The Workforce Innovation and Opportunity Act (WIOA) amends these sections to require States to report additional data describing the individuals served and the services provided through these programs. WIOA also amends section 106 of the Act by eliminating the current VR evaluation standards and indicators and requiring that the standards and indicators used to assess the performance of the VR program be consistent with the performance accountability measures, established under section 116 of WIOA, for the core programs of the workforce development system, including the VR program. Consequently, we propose changes to §§361.40 and 363.52 that would cause substantive changes to the active and OMB-approved data collection under 1820-0508 – the VR Case Service Report (RSA-911).

The most significant proposed change to this data collection affects the time at which data is collected as well as the frequency with which data is collected. Under the current approved form, VR agencies annually report data on each individual whose case file is closed after exiting the VR program in that fiscal year. However, new statutory requirements would necessitate the reporting of data for both current program participants (open cases), as well as individuals who have exited the program (closed cases) on a quarterly basis. Specifically, proposed §361.40 would require a State to ensure in the VR services portion of the Unified or Combined State Plan that it will submit reports, including reports required under sections 13, 14, and 101(a)(10) of the Act. New reporting requirements under section 101(a)(10)(C) of the Act include data on the number of: individuals currently receiving services (open cases) and the types of services they are receiving, students with disabilities receiving pre-employment transition services, and individuals referred to the State VR program by one-stop operators and those referred to such one-stop operators by the State VR program. In addition, proposed §363.52 would require States to report separately data regarding eligible youth receiving supported employment services under parts 361 and 363. Proposed §361.40 also would require States to report the data necessary to assess VR agency performance on the standards and indicators subject to the performance

accountability provisions described in section 116 of WIOA. The common performance accountability measures established under section 116 of WIOA apply to all core programs of the workforce development system and will be implemented in joint regulations set forth in subpart E of part 361.

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 Rehabilitation Services Administration (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 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 Act, which under WIOA must be consistent with the common performance accountability measures established for the core programs of the workforce development system.

In addition, RSA uses data reported through this data collection to support its other responsibilities under the Act. Section 14 (a) of the Act calls for the evaluation of programs in the Act, as well as an assessment of the programs' effectiveness in relation to cost. Many of these evaluation studies have utilized RSA-911 data. RSA uses data captured through the RSA-911 during the conduct of both the annual reviews and periodic onsite monitoring of VR agencies required by section 107 of the Act to examine the effectiveness of program performance.

Other important management activities, such as the provision of technical assistance, program planning, and budget preparation and development, are greatly enhanced through the use of RSA-911 data. The RSA-911 is considered to be one of the most robust databases in describing the demographics of the disabled population in the country and as such is used widely by researchers' 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. Also describe any consideration of using information technology to reduce burden.

The RSA-911 is an electronic text file that is created by extracting selected data elements from the VR agency case management and data systems. This process poses little burden on the agencies. The text files are submitted electronically to a Department of Education server via secure file transfer protocol (SFTP). If agencies are unable to submit their data to the SFTP server, data are sent on a compact disc via overnight services and must be signed for by the recipient.

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

The RSA-911 is the only data collection through which RSA requires data to be reported for each individual who has applied for, and is receiving, VR services. These data are not otherwise collected by the Department of Education. Although some data elements included in the RSA-911 currently are reported in the aggregate by VR agencies on a quarterly basis through the VR Cumulative Caseload Report (RSA-113), RSA plans on withdrawing that form after the implementation of the revised version of the RSA-911, through which VR agencies will now report these same data on an individual and quarterly basis. There is no duplication of the individualized data collected through the RSA-911 with any other reporting systems.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The collection of information for the RSA-911 does not have an impact on small businesses or other small entities. All respondents are State government agencies.

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.

As a result of the amendments to the Act made by WIOA, the RSA-911, which is currently approved as an annual data collection, must be collected quarterly. Without this data collection on a quarterly basis, RSA would be unable to comply with section 116 of WIOA, which mandates the use of new performance indicators (some of which are based on quarters) to assess the performance of the core programs comprising the workforce development system, including the VR program.

In addition, the Departments of Education and Labor administer the other core programs of the workforce development system using a program year beginning on July 1st and ending June 30th, while RSA uses the federal fiscal year (October 1st through September 30th) in the administration of the VR and supported employment programs as required by the Act. Because the WIOA program year and the federal fiscal year are offset by one quarter (July 1 through September 30), RSA needs quarterly data submissions so that it can draw comparisons between both program and fiscal years. If the RSA-911 was collected less frequently than quarterly, it would be incompatible with the performance reporting template required under title I of WIOA jointly developed by the Departments of Education and Labor and published for comment in this issue of the Federal Register, and would necessitate that VR agencies track and report the same data using two different reporting calendars.

Finally, RSA would be able to use data reported quarterly through the RSA-911 to better identify VR agencies that are performing poorly and to provide more timely technical assistance to address this 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 which 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 described in the bulleted items above.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, 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.

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.

This version of the RSA-911 was prepared by RSA to enable VR agencies to report new data elements required under sections 101(a)(10) and 607 of the Act, as amended by WIOA, and proposed in §§361.40 and 363.52. Following publication of the 60 day notice in the Federal Register, RSA will respond to all comments received and make any changes warranted.

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

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.

RSA's policy is always to maintain the confidentiality of individual service record data. The only personal identifier contained in the RSA-911, the Social Security Number (SSN), is used for record control purposes (i.e., to cull out duplicates) and for the RSA-SSA Data Exchange required by section 131 of the Act. Equally important, section 13 of the Act reinforces RSA policy by expressly stating that the 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) was published in the Federal Register April 8, 2004. The link is: <http://www.ed.gov/notices/pai/pai-18-16-02.pdf>

The Privacy Impact Assessment is at the following link:
http://www2.ed.gov/notices/pia/csr_041408.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 questions of a sensitive nature collected through the RSA-911 system. Other items sometimes perceived as sensitive, such as race, type of disability, and earnings, are all required by the Act.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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 item 13 of OMB Form 83-I.**
- **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 not be included in Item 14.**

As stated elsewhere in this Supporting Statement, RSA has revised the currently-approved RSA-911 to enable VR agencies to report new data elements required under sections 101(a)(10) and 607 of the Act, as amended by WIOA, and proposed in §§361.40 and 363.52. The below table describes the burden RSA estimates the 80 VR agencies will incur in the collection of these additional data elements and the total burden experienced when reporting the entire RSA-911 on a quarterly, rather than an annual, basis.

The total burden estimate for the proposed revised RSA-911

Burden Type	Per Agency	Nationally (80 Agencies)
Incremental hours for collecting new RSA-911 data by agency (15 minutes times 125 average number of counselors per agency divided by 60 minutes)	31.25	2,500
Cost per agency based on \$22.27 wage rate (VR counselor wage rate)	\$695.94	\$55,675
Hours for submitting RSA-911 data file per agency	100	8,000
Cost per agency based on \$33.63 wage rate (State-employed database administrator wage rate)	\$3,363.00	\$269,040
Total burden hours - collection and submission	131.25	10,500
Total burden cost - collection and submission	\$4,059.00	\$ 324,715

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 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.**

This collection does not require the respondents to incur capital or start-up costs in connection with this data collection because they already collect the data for the purpose of maintaining their Federal grants. The costs to the respondents are strictly those associated with the programming and modifications of data retrieval systems as a result of the revisions to the RSA-911 and its instructions due to the new data required under section 101(a)(10) of the Act. The costs are one-time, first-year costs.

The burden on the VR agencies related to the programming of their case management systems as a result of the redesigned RSA-911 will vary widely because agencies themselves range in size and sophistication of their information technology systems. Roughly half of the 80 VR agencies use case management and reporting systems purchased from software providers who are responsible for maintaining and updating software. We estimate those VR agencies would experience no or minimal increases in cost burden. The remaining VR agencies have developed their own case management systems for which changes will be made by their information technology staff or outside contractors. We estimate that approximately 20 of these agencies will make the changes in-house and the remaining 20 agencies would contract for the changes to be made.

The following tables provide an estimate of the burden hours and costs for reconfiguring the case management and reporting systems for those 20 agencies that effect the changes in-house and for those 20 that contract with others to make the necessary programming changes. Before the effective date of the revised RSA-911, some of the VR agencies that have not already done so may purchase case management software systems.

The costs to the VR agencies to effect the programming changes necessary will differ considerably based on many factors including availability of State programming and contracting costs which may vary widely based on location.

To fully implement the revised RSA-911 case management and reporting system, certain development activities must occur. The system development costs can be estimated by focusing on the systems environment of the VR agencies.

1. VR agencies that have their own (i.e., not vendor provided) case management and reporting systems, which they maintain and update.
2. VR agencies that have their own (i.e., not vendor provided) case management and reporting systems and use IT contractors for system maintenance and updating.

1. VR agencies that maintain and update their own (i.e., not vendor-provided) case management systems

Category	Number of agencies affected	Hours per agency	Total hour burden	Hourly rate	Total dollar burden
Review specifications and write software, prepare deployment plan, test and install (Wage rate for State-employed computer and information systems managers)	20	240	4,800	\$44.72	\$214,656
Total			4,800		\$214,656

2. VR agencies that use contractors to maintain and update their own (i.e., not vendor provided) case management systems

Category	Number of agencies affected	Hours per agency	Total hour burden	Hourly rate	Total dollar burden
Review specifications and write RFP. Test and install new software (Wage rate for private sector computer programmers)	20	100	2,000	\$39.21	\$78,420
Contractor support (Wage rate for private sector computer and information system managers)	20	400	8,000	\$67.32	\$538,560
Total			10,000		\$616,980

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 use of an automated edit system will reduce the Government cost per submission. Costs to the Federal government for processing RSA-911 data will be computed on a quarterly, not annual, basis.

Activity	Hours per state agency submission	Annual hours for 4 quarterly state agency submissions	Estimated Salary and overhead costs for RSA
	.5	2	\$200
Review of RSA-911 data file	1	4	\$400
Editing RSA-911 record files	1	4	\$400
Approval of RSA-911 submission	.5	2	\$200
Total for one agency submission	3	12	\$1,200
Total for all 80 VR agency submissions	240	960	\$96,000

15. Explain the reasons for any program changes or adjustments reported in Item 16 of the new OMB Form 83-I.

Because these new requirements would necessitate the reporting of data for both current program participants (open cases) as well as individuals who have exited the program (closed cases) on a quarterly basis, estimated data collection and reporting burden will increase. However, we propose to reduce the burden to respondents by eliminating redundant elements and reorganizing some existing elements of the form. The regulations proposed under this section will increase the total annual burden for the 80 respondents by 4,000 hours. We estimate the total annual reporting burden to be 8,000 hours at \$33.63 per hour (a rate more consistent with the rate reported through the Bureau of Labor Statistics for State-employed database administrators), for a total annual cost of \$269,040.00.

Global Changes:

- RSA-911 reporting changed from annual report of closed case service records to quarterly reporting of both open and closed case service records reported quarterly with data due 60 days from end of each calendar quarter. Grantees must submit quarterly data for the first four full quarters after the consumer exits the VR program.
- Previous references to Closure have been changed to Exit.
- File submission must now be certified.

New Data Elements Added:

- Calendar Year
- Calendar Quarter
- Start Date of Pre-Employment Transition Services
- Pre-Employment Transition Services
 - Job Exploration Counseling
 - Work-Based Learning Experiences
 - Counseling on Enrollment Opportunities
 - Workplace Readiness Training
 - Instruction in Self-Advocacy
- Organizations Referred To
- State Definition for Age of Students with Disabilities
- Unemployment Insurance Quarterly Earnings
- Case Service Record Archive Date

Data Elements Eliminated:

- Closure Order – after adoption of the form
- Previous Closure – after adoption of the form
- Start Date of Extended Evaluation
- End Date of Extended Evaluation

Comparison of the new RSA-911 to the previous RSA-911 Case Service Report

New Data Element Number	Previous Data Element Number	Data Element Description	Change, if any, from previous RSA-911
1	1	Agency Code	No change
2	2	Social Security Number	No change
3		Calendar Year	New data element
4		Calendar Quarter	New data element
5	3	Closure Order	Used only for service records opened prior to the date of form adoption, i.e., not collected for service records opened after form adoption
6	4	Previous Closure	Used only for service records opened prior to the date of form adoption, i.e., not collected for service records opened after form adoption
7		Start Date of Pre-Employment Transition Services	New data element
8	5	Date of Application	No change
9	6	Date of Birth	No change
10	7	Gender	No change
11-15	8-12	Race	No change
16	13	Ethnicity	No change
17	14	Veteran Status at Application	Data element name changed from "Veteran Status" to "Veteran Status at Application"
18	17	Source of Referral at Application	Data element name changed from "Source of Referral" to " Source of Referral at Application"
19	21	Living Arrangement at Application	No change
20	25	Employment Status at Application	The coding option 1 ("Employment without Supports in Integrated Setting") has changed to "Competitive Integrated Employment." Coding options 5 and 6 ("Homemaker" and "Unpaid Family Worker") have been eliminated.

New Data Element Number	Previous Data Element Number	Data Element Description	Change, if any, from previous RSA-911
			Coding option 7 ("Employment with Supports in Integrated Setting") has been changed to Competitive Integrated Employment with Supports."
21		Primary Occupation at Application	New data element
22 & 253	26 & 197	Hourly Wage at Application & Exit	"Weekly Earnings" have been changed to "Hourly Wage."
23 & 254	27 & 198	Hours Worked in a Week at Application & Exit	No change
24-30 & 255-261	28-34 & 199-205	Monthly Public Support Amount at Application & Exit	No change
31 & 262	35 & 206	Primary Source of Support at Application & Exit	No change
32-38 & 263-269	36-41 & 207-212	Medical Insurance Coverage at Application & Exit	Data elements 38 and 269 are new elements and capture "State or Federal Affordable Care Exchange."
39	46	Date of Eligibility Determination	No change
40	47	Date of Placement on Order of Selection Waiting List	No change
41	48	Date of Exit on Order of Selection Waiting List	No change
42	15	Zip Code	Data element name changed from "Zip Code at Application" to "Zip Code"
43	16	County Name	Data element name changed from "County Name at Application" to "County Name"
44		Organizations Referred To	New data element
45	18	Involvement with Other Agencies and Services	Coding options added
46-74	19 & 191	Education	"Level of Education Attained at Application/ Closure" has changed from one data element with 13 coding options to 29 discrete data elements used to report WIOA performance indicators.
75	20 & 192	Youth with Disabilities	"Student with Disability in Secondary Education at

New Data Element Number	Previous Data Element Number	Data Element Description	Change, if any, from previous RSA-911
			Application/Closure" changed to one data element entitled "Youth with Disabilities." While coding options are largely the same, the description of the data element has been modified to align with WIOA.
76		State Definition for Age of Students with Disabilities	New data element
77	22	Primary Disability	No change
78	23	Secondary Disability	No change
79	24	Significance of Disability	Clarification made to the description
80	42	Start Date of Trial Work Experience	No change
81	43	End Date of Trial Work Experience	No change
82	49	Date of Individualized Plan for Employment (IPE)	No change
83	50	Supported Employment Goal on Current IPE	Data element name changed from "Supported Employment Goal" to "Supported Employment Goal on Current IPE" and is reported quarterly to capture if the individual has a supported employment goal on his/her current IPE. Description of the data element has been updated to reflect changes in definition of supported employment due to WIOA.
84-108		Services Provided and Costs for Purchased Services for Pre-Employment Transition Students	New data element
109-248	51-190	Services Provided and Costs for Purchased Services for Participants of the VR Program	Data element 4) Supported Employment State Grant "(Title VI)" changed to "(Title VI)." New coding options have been added to data element 5) Comparable Services and Benefits Provider.

New Data Element Number	Previous Data Element Number	Data Element Description	Change, if any, from previous RSA-911
			<p>Service category "On-the-Job Supports - Supported Employment" - description changed from "not to exceed 18 months" to "not to exceed 24 months."</p> <p>Service category "Customized Employment" - description has been updated due to WIOA.</p>
249	193	Number of Jobs at Exit	No change
251	195	Start Date of Employment in Primary Occupation at Exit	Description has been clarified.
250	194	Primary Occupation at Exit	May now add up to two positions. Homemaker and Unpaid Family Worker codes are eliminated.
252	196	Employment Status at Exit	<p>The coding option 1 ("Employment without Supports in Integrated Setting") has changed to "Competitive Integrated Employment."</p> <p>Coding option 2 ("Extended Employment") has been eliminated. Coding options 5 and 6 ("Homemaker" and "Unpaid Family Worker") have been eliminated.</p> <p>Coding option 7 ("Employment with Supports in Integrated Setting") has been changed to Competitive Integrated Employment with Supports."</p>
270	213	Type of Exit	Coding options are reordered and contain the new definition for employment outcomes.
271	214	Reason for Exit	Reason 2 - "Disability too significant to benefit from VR services" has been changed from "cannot benefit" to "cannot benefit or continue to benefit."

New Data Element Number	Previous Data Element Number	Data Element Description	Change, if any, from previous RSA-911
			Reasons have been added and renumbered.
272	215	Date of Exit	No change
273		Unemployment Insurance Quarterly Earnings	New data element
274		Employer Identification Number	New data element
275		Case Service Record Archive Date	New data element
	44	Start Date of Extended Evaluation	Eliminated
	45	End Date of Extended Evaluation	Eliminated

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.

Tabulations are generated to describe program-related characteristics by (a) State VR agency and by (b) specific target groups (e.g., the type of disability, race or gender). There are 80 State VR agencies and a large number of target groups by which the data can be displayed by type of closure (e.g., with or without an employment outcome).

The analysis of the data will provide demographics, relationships between variables, and program outcomes to assist in understanding and monitoring the VR programs. Summaries of selected characteristics for all persons served including those with significant disabilities are published in the RSA Annual Report to Congress.

The data are also used for preparing monitoring tables, determining performance against RSA's standards and indicators and by researchers who conduct analyses. Data from the RSA-911 without personally identifiable information is also transferred to the RSA Management Information System, through which tables are generated for use by RSA and the public.

Timeline	Process
December 2014	Revised RSA-911 enters clearance
March 2015	Revised RSA-911 published in the Federal Register
September 2015	RSA-911 form approval expected
September 2015 to June 2016	State agencies update and test systems to address new/revised data elements

Timeline	Process
September 2016	Agencies use new data elements for FY 2017 fiscal year
December 2016	Agencies submit FY 2017 data to RSA

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.

Approval is not being sought to omit the display of the expiration date for OMB approval of the information collection.

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

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