UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES
REHABILITATION SERVICES ADMINISTRATION

Date: July 31, 2026
DCL-26-03

Dear Colleagues:

Through this Dear Colleague Letter (DCL-26-03), the Rehabilitation Services Administration (RSA) is transmitting a copy of the revised Vocational Rehabilitation Financial Report (RSA-17) form and instructions for the State Vocational Rehabilitation Services (VR) program. The RSA-17 collects semiannual cumulative VR financial data on an award-by-award basis.

On July 30, 2026, RSA received approval from the Office of Management and Budget (OMB) for the RSA-17 (OMB Control Number: 1820-0017) extension with revisions. The revisions are effective for reporting period end dates after October 1, 2026.

For your convenience, the edits to the form and instructions include the following:

- Removal of reporting element, line 15(a), which pertained to Required and Coordination Pre-employment Transition Service Activities and Other VR Services that Support Access to and Participation in Pre-Employment Transition Services.
- Clarification that Social Security Administration (SSA) program income earned in the VR program and transferred to the Statewide Independent Living Services (SILS) program must be transferred to the designated State entity (DSE) within the State.
- Enhancements allowing tracking of unliquidated obligations and liquidations for the Establishment and Construction of Facilities for Community Rehabilitation Program (CRP) purposes through revisions to lines 28, 32, and 33.
- Reservation of numbers 30, 31, 34, 35, and 38, indicating that data entry for these lines is not required.
- Addition of an example to the basis of accounting directions to further clarify reporting requirements.
- Minor miscellaneous typographical edits.

This DCL rescinds and replaces the previous RSA-17 instructions (DCL-25-02), which RSA issued on December 2, 2024. If you have any questions about completing the RSA-17, please contact the Financial Management Specialist assigned to your agency.

Sincerely,

Christopher Pope Digitally signed by Christopher Pope
Date: 2026.07.31 13:18:35 -04'00'

Christopher Pope
Director, State Monitoring and Program Improvement Division, delegated the authority to perform the functions and duties of the Commissioner

Attachments

Attachment A: RSA-17 Form

VOCATIONAL REHABILITATION FINANCIAL REPORT (RSA-17)		
A. Grant Award Information		
1. Federal Award Identification Number	2. Federal Fiscal Year	3. Grant Period (From/To)
4. Recipient Organization		
5. Basis of Accounting* ☐ Accrual ☐ Cash	6. Reporting Period End Date	7. Final Report*
8. UEI Number	9. Recipient Account Number or Identifying Number	

B. Federal Funds	**Amount**
10. Total Federal Funds Awarded	
11. Federal Cash Receipts*	
12. Federal Cash Disbursements*	
13. Federal Cash on Hand	
14. Federal Share of Expenditures* (do not include program income)	
15. Federal Expenditures Incurred for the Provision of Pre-employment Transition Service Activities and Certain Other VR Services Needed to Access or Benefit from Pre-Employment Transition Services (only include expenses charged to the Federal funds required to be reserved for pre-employment transition services)	
a. Required and Coordination Pre-employment Transition Service Activities and Other VR Services that Support Access to and Participation in Pre-Employment Transition Services	
b. Authorized Pre-employment Transition Service Activities*	
16. Federal Share for Establishment of Facilities for CRP Purposes*	
17. Federal Share for Construction of Facilities for CRP Purposes*	
18. Federal Share of Unliquidated Obligations*	
19. Total Federal Share	
20. Unobligated Balance of Federal Funds	
C. Federal Program Income	**Amount**
21. Total Federal Program Income Received*	
22. Program Income Expended in VR Program in Accordance with Addition Alternative*	
23. SSA Payments Transferred to the State Independent Living Services Program*	
24. SSA Payments Transferred to the Independent Living Services for Older Individuals who are Blind Program*	
25. SSA Payments Transferred to the Client Assistance Program*	
26. SSA Payments Transferred to the State Supported Employment Services Program*	
27. Unexpended Program Income	
D. Reporting Non-Federal Share in the FFY of Appropriation (1st - 4th Qtr.)	**Amount**
28. Total Non-Federal Share of Expenditures (1st - 4th Qtr.)*	
a. Of the Amount Reported in Line 28, the Non-Federal Share for Establishment of Facilities for CRP Purposes (1st – 4th Qtr.)*	
b. Of the Amount Reported in Line 28, the Non-Federal Share for Construction of Facilities for CRP Purposes (1st - 4th Qtr.)*	
29. Non-Federal Share of Unliquidated Obligations (1st - 4th Qtr.)*	

*Data entry required.

OMB Control Number: 1820-0017

E. Status of Unliquidated Obligations Reported on 4th Quarter RSA-17 Report	**Amount**
32. Non-Federal Expenditures for Unliquidated Obligations Reported on the 4th Quarter Report, Line 29, Liquidated After the 4th Quarter (5th – 8th Qtr.)*	
a. Of the Amount Reported in Line 32, the Amount that was Liquidated for Non-Federal Share of Establishment of Facilities for CRP Purposes*	
b. Of the Amount Reported in Line 32, the Amount that was Liquidated for Non-Federal Share of Construction of Facilities for CRP Purposes*	
F. Reporting Additional New Non-Federal Expenditures in the Carryover Year (5th – 8th Qtr.)	**Amount**
33. Additional New Non-Federal Expenditures (5th – 8th Qtr.)*	
a. Of the Amount Reported in Line 33, the Non-Federal Expenditures for Establishment of Facilities for CRP Purposes (5th – 8th Qtr.)*	
b. Of the Amount Reported in Line 33, the Non-Federal Expenditures for Construction of Facilities for CRP Purposes (5th – 8th Qtr.)*	

G. Indirect Expenses

36. Federal Cognizant Agency for Indirect Costs:*

a. Type	b. Rate*	c. Period From*	d. Period To*	e. Base*	f. Amount Charged	g. Federal Share*
			h. Totals			

H. Select Federal and Non-Federal Expenditures (Include Program Income — Do NOT Include Unliquidated Obligations)	**Amount**
37. Administrative Expenditures*	
39. Services to Groups	
a. Establishment, Development, or Improvement of CRP*	
b. Telecommunication Systems*	
c. Special Services to Provide Nonvisual Access to Information*	
d. Technical Assistance to Businesses*	
e. Business Enterprise Program (Randolph-Sheppard Program)*	
f. Transition Consultation and Technical Assistance*	
g. Transition Services to Youth and Students*	
h. Establishment, Development, or Improvement of Assistive Technology*	
i. Support for Advanced Training*	
40. American Job Center Infrastructure Expenditures*	
41. Total Innovation and Expansion (I&E) Expenditures*	
a. I&E Expenditures Supporting State Rehabilitation Council Resource Plan*	
b. I&E Expenditures Supporting Statewide Independent Living Council Resource Plan*	

I. Remarks

42. Remarks

*Data entry required.

J. Certification: By signing this report, I certify that it is true, complete, and accurate to the best of my knowledge. I am aware that any false, fictitious, or fraudulent information may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)	
43. Full Legal Name of Signer*	
a. Certifying Official Title*	
44. Telephone* (Area code, number)	
a. Telephone Extension (if any)*	
45. Email Address*	
46. Signature*	
47. Date Report Submitted	

*Data entry required. OMB Control Number: 1820-0017

Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1820-0017. Public reporting burden for this collection of information is estimated to average 32.7 minutes/hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is mandatory because the form is required under the terms and conditions of the State Vocational Rehabilitation Services program. If you have any comments concerning the accuracy of the time estimate, suggestions for improving this individual collection, or if you have comments or concerns regarding the status of your individual form, application or survey, please contact David Steele, U.S. Department of Education, Rehabilitation Services Administration, 400 Maryland Ave. S.W., Washington, D.C. 20202 or email RSAfiscal@ed.gov.

Attachment B: RSA-17 Instructions

I. General Information

The RSA-17 is a cumulative report that captures the financial status of a specific Federal VR grant award identified by the Federal Award Identification Number (FAIN) in data element A.1 (e.g., H126A250XXX) at a specific point in time. Recipients use the form to report cumulative obligations and expenses that are calculated by adding all transactions from the beginning of the period of performance for the award (i.e., beginning of the reporting period) to the end of the reporting period specified on the RSA-17. This means the Federal award data reported throughout the RSA-17, including but not limited to those in Section B, Federal Funds, must specifically account for Federal award drawdowns, disbursements, expenditures, obligations, and unobligated funds directly associated with the FAIN identified in data element A.1.

Recipients are required to maintain supporting documentation to substantiate the financial data reported on the RSA-17, as is true for any financial reports submitted by the recipient (2 C.F.R. § 200.302(a)). Additionally, the recipient's financial and accounting systems must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award (Id.). This means recipients must ensure their supporting documentation identifies transactions that directly tie to the FAIN identified in A.1, not just transactions that occurred during the reporting period for the VR program.

Typically, the RSA-17 will be available online the next working day after the end date of the reporting period. Once the award period has begun, a recipient is required to submit an RSA-17 report semi-annually for every grant award's period of performance, regardless of whether obligations or expenses were incurred during any reporting period. If expenses were not incurred during the reporting period, the recipient must report zeros in the required data elements.

Agencies are responsible for having internal controls necessary to ensure RSA-17 data are accurate, complete, reliable, and submitted timely to RSA. Agencies may request that an RSA-17 report be re-opened for revision. The RSA Financial Management Specialist assigned to the recipient will review the request and, if necessary, place the form in an edit status to permit the recipient to make changes.

It is particularly important that a recipient revise its 4th quarter RSA-17 report if any accounting adjustments made after the report has been submitted change the amount of expenditures reported as of the end of the 4th quarter reporting period. For example, sometimes recipients may make accounting adjustments using journal vouchers to reassign expenditures, already reported in a prior period, to another funding source (e.g., Federal or State). These adjustments, after the expenditure has been reported, would require revisions to the previously submitted financial reports based upon when the

obligation or expenditure was incurred.

Forms must be submitted electronically through the RSA Management Information System (RSAMIS). In addition, recipients should maintain a hard copy of the report, signed by the certifying official, for verification purposes.

To enter data into this form online, visit rsa.ed.gov. To enter data, individuals must have a user ID and be assigned access to the form. If you do not have a user ID, the procedures for obtaining one are located at: rsa.ed.gov/help/technical-support.

If any of the information in pre-populated or calculated data fields is inaccurate, please contact the RSA Financial Management Specialist assigned to your award.

II. Definitions and Technical Assistance

A. Allowable Cost — (See definition in 2 C.F.R. § 200.403)
Only allowable VR program costs are reported on the RSA-17.

B. Applicable Credits — (See definition in 2 C.F.R. § 200.406(a))
The applicable credit must be applied to the Federal fiscal year (FFY) from which the initial cost expenditure was made. If the initial expense was paid with non-Federal funds, the applicable credit is applied to the fund from which the initial expenditure was made (in other words, non-Federal funds). For expenses funded by both non-Federal and Federal funds, the credit is applied to each funding source in proportion to the initial amounts paid. Refunds to Federal and non-Federal funds may require an adjustment to data elements on the RSA-17 report, including reports previously submitted. Grantees should contact their Financial Management Specialist for technical assistance.

C. Carryover — The unobligated balance of authorized Federal funds that a recipient may obligate and expend in a subsequent FFY provided the State met the cost sharing requirements by the end of the FFY of appropriation (Section 19 of the Rehabilitation Act of 1973, as amended (Rehabilitation Act) and 34 C.F.R. § 361.64).

D. Disbursement — The act of paying out money.

E. Expenditures — (See definition in 2 C.F.R. § 200.1)
References to subrecipients in the definition above are not applicable to the VR program since there is no authority under the Rehabilitation Act or its implementing regulations for subawarding, also known as subgranting (see Prohibition Against Supplanting Grant Award Notification (GAN) Attachment).

F. Federal Fiscal Year (FFY) of Appropriation — The FFY of appropriation is the FFY for which Congress appropriated funds to the U.S. Department of Education (ED) from which ED awards program grants, specifically the period from October 1 through September 30. For example, the FFY 2025 VR grants were made from the 2025 FFY of appropriation, which covered the period of

October 1, 2024, through September 30, 2025.

G. Financial Obligations — (See definition in 2 C.F.R. § 200.1)
There is no authority for subawards, as defined in 2 C.F.R. § 200.1, under the VR program. Additionally, the future period in which obligations may be liquidated is limited by Federal requirements and the terms and conditions applicable to the award.

Education Department General Administrative Regulations (EDGAR) at 34 C.F.R. § 76.707 provide additional guidance regarding when obligations are made. For example, travel is considered obligated when the travel is taken, and personnel expenditures for State agency employees are considered obligated when the employee performs the services.

In determining when an obligation is made, recipients must also follow their State laws, regulations, and policies and procedures, as applicable.

If the recipient has not met the requirements of Section 19 of the Rehabilitation Act to carry over Federal funds for obligation and expenditure in the subsequent fiscal year, the recipient must incur all obligations, for which it has provided sufficient match funds, by the end of the FFY of appropriation (i.e., September 30). In this circumstance, the period of performance and the FFY of appropriation are the same.

If the recipient has met the carryover requirements by the end of the FFY of appropriation, the period of performance will be extended to include the carryover period (subsequent FFY). This will enable the recipient to incur new obligations against Federal award funds during the carryover period, as indicated by the revised period of performance on the GAN. In other words, in this circumstance, the period of performance covers two FFYs – the FFY of appropriation plus the carryover year.

Regardless of the accounting basis a recipient uses, it must assign, track, and report financial obligations made against Federal and non-Federal sources.

H. Liquidation — The issuance of payment for an obligation.

I. Period of Performance — (See definition in 2 C.F.R. § 200.1)
ED, as the Federal awarding agency, must include start and end dates of the period of performance in the Federal award. For purposes of ED's GANs, the period of performance is referred to as the Federal Funding Period (Box 6 of the GAN).

J. Program Income — (See definitions in 2 C.F.R. § 200.1 and 34 C.F.R. § 361.63)
Program income is Federal revenue and cannot be used to meet the non-Federal share requirement (34 C.F.R. § 361.63(c)(4)). Sources of program income include, but are not limited to –

1. Payments from the Social Security Administration (SSA) for assisting SSA beneficiaries and recipients to achieve employment outcomes,

including the Cost Reimbursement and Ticket to Work programs;
2. Payments received from workers' compensation funds; payments directly received by the VR agency from insurers, consumers, or others for services to defray part or all the costs of services provided to individuals; and
3. Income generated by a State-operated community rehabilitation program (CRP) for activities authorized under this part (34 C.F.R. § 361.63(b)).

Program income does not include rebates, credits, discounts, and interest earned on any of them (2 C.F.R. § 200.1).

In accordance with 34 C.F.R. § 361.63(c)(3)(ii), "to the extent that program income funds are available, a State must disburse those funds (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional funds from the Department." SSA program income received in the VR program and transferred to an allowable program is considered disbursed for purposes of the VR program.

K. Reporting Period — The time period for which the recipient reports financial information on any given report. For example, for purposes of the 4th quarter report, the reporting period covers the period from October 1 through September 30.

L. Unliquidated Financial Obligation — (See definition in 2 C.F.R. § 200.1) Regardless of the accounting basis a recipient uses, a recipient must assign, track, and report financial obligations made against Federal and non-Federal sources.

M. Unobligated Balance — (See definition in 2 C.F.R. § 200.1)

III. Form Instructions

A. Grant Award Information

1. Federal Award Identification Number:
   - Data entry not required.

   The recipient's grant award number listed in Box 2 of the GAN is the default entry.

2. Federal Fiscal Year:
   - Data entry not required.

   The FFY of appropriation as listed in Box 2 of the GAN is the default entry.

3. Grant Period (From/To):
   - Data entry not required.

   The Federal Funding Period in Box 6 of the GAN is the default entry. This data element represents the period for which the funds were awarded (34 C.F.R. § 77.1(c)). The Uniform Guidance uses the term "period of

performance" rather than "grant period." Period of performance is defined in 2 C.F.R. § 200.1 in a manner like the EDGAR definition of "grant period." A recipient may neither obligate nor pay expenditures for costs of a grant award that are incurred prior to the start of the period of performance. For example, the cost for VR services provided to a consumer prior to the start of the period of performance for a grant award may not be charged to that grant award. Rather, those obligations must be charged to the prior grant award or another funding source. Additionally, a recipient may not obligate award funds after the end of the period of performance for a grant award but could make allowable accounting adjustments to expenditures if permitted by State rules.

During the FFY of appropriation, the Federal Funding Period listed in Box 6 of the GAN will be from October 1 to September 30 of that FFY. This represents the one-year period for which the award is made and in which the recipient may incur new obligations against the award. Section 19(a)(1) of the Rehabilitation Act *permits States to carry over Federal funds for obligation and expenditure in the subsequent FFY provided certain conditions are met* (see the Carryover Grant Award Notification Attachment for additional details). This means that States may carry over the matched portion of the unobligated balance of Federal funds for one FFY beyond the FFY of appropriation so long as the conditions of Section 19 of the Rehabilitation Act were satisfied. For example, the FFY of appropriation for FFY 2025 awards began on October 1, 2024, and ends on September 30, 2025. The carryover period for FFY 2025 awards starts on October 1, 2025, and ends on September 30, 2026.

Upon submission of the State's 4th quarter RSA-17 report(s) (which is for the reporting period ending September 30 of the FFY of appropriation), consistent with standard operating procedures for assessing carryover, an RSA Financial Management Specialist will review the report(s) to determine whether the State met the requirements necessary to carry over funds for obligation and liquidation in the subsequent FFY. If the State met the requirements of Section 19 of the Rehabilitation Act to carry over funds, RSA will process an administrative change to the appropriate GAN(s) extending the period of performance to include the carryover period.

Unless ED authorizes an extension for the carryover period consistent with the requirements of Section 19 of the Rehabilitation Act, a recipient must liquidate all obligations incurred under the Federal award not later than 120 calendar days after the end date of the period of performance, as specified on the GAN (2 C.F.R. § 200.344(c)).

4. Recipient Organization:

- Data entry not required.

The organization's name and address listed in Box 1 of the GAN is the default entry.

5. Basis of Accounting:
Specify whether the recipient used a cash or accrual basis for recording Federal and non-Federal grant award transactions that form the basis for the financial data submitted on the RSA-17.

For cash-based accounting, expenses are recorded when they are paid. The transaction remains at the obligation stage until the liability is eliminated by the disbursement of cash (in other words, the liquidation of the obligation).

Accrued expenditures are recorded when goods or services are received, regardless of when cash is received or paid. The accrual method of accounting elevates an obligation to an expenditure once the liability to pay has been created, as opposed to when the expenditure is actually paid.

A recipient must report expenditures using either a cash or accrual basis of accounting (2 C.F.R. § 200.1). However, if a recipient changes from one basis of accounting to another, the recipient must inform RSA of the change. To ensure recipients are not utilizing separate bases of accounting for reports covering the same period of performance, changes to a recipient's basis of accounting should coincide with the end of the period of performance for the grant award, thereby ensuring consistency for the entire period of performance.

Example of Cash and Accrual Reporting:
An agency orders $5,233 in office supplies on March 1. The supplies are delivered on March 15, and the bill is received on March 29. The agency pays the bill on April 15.

Cash Basis
The expenditure for the supplies is recorded when the bill is paid on April 15. There is a 46-day gap between the obligation on March 1 and the liquidation of funds on April 15, resulting in an expenditure. The $5,223 was an unliquidated obligation until April 15; therefore, it is reported on the RSA-17 for the reporting period ending March 31 as an unliquidated obligation.

Accrual Basis
The expenditure for the supplies is recorded on the date the recipient creates the liability to pay, thus elevating the obligation to an expenditure at the time, well before the bill is paid on April 15. In this example, assume the recipient creates the liability to pay on March 29 when the invoice is received. The $5,223 was an unliquidated obligation on March 1 but is recorded as an expenditure on March 29. Therefore, it is reported on the RSA-17 for the reporting period ending March 31 as an expenditure.

6. Reporting Period End Date:

- Data entry not required.

The default reporting period end date corresponds with the end of the required semi-annual reporting period. The period covered is always the beginning date of the grant through the end of the reporting period. Therefore, the RSA-17 collects cumulative data for the period of performance. An example is included in the tables below:

Table 1: VR Award Does Not Qualify for Carryover

Reporting Period – FFY 2025 Award	Reporting Period End Date	Qtr.	Report Type
October 1, 2024 – March 31, 2025	March 31, 2025	2	Semi-Annual
October 1, 2024 – September 30, 2025	September 30, 2025	4	Final

Table 2: VR Award Qualifies for Carryover

Reporting Period – FFY 2025 Award	Reporting Period End Date	Qtr.	Report Type
October 1, 2024 – March 31, 2025	March 31, 2025	2	Semi-Annual
October 1, 2024 – September 30, 2025	September 30, 2025	4	Annual
*October 1, 2024 – March 31, 2026	March 31, 2026	6	Semi-Annual
*October 1, 2024 – September 30, 2026	September 30, 2026	8	Final

*These reports are only used if the State has met the requirements of Section 19 of the Rehabilitation Act necessary to carry over Federal funds for obligation and expenditure in the succeeding FFY.

The RSA-17 reports must be submitted –

- 30 calendar days after the end of the reporting period if the report is *not* the final report; and
- 120 calendar days after the end of the reporting period if the report is the final report (2 C.F.R. § 200.328(c) and (d)).

If RSA has approved a late liquidation request, the final RSA-17 report will be due 30 calendar days after the end date of the approved liquidation period.

7. Final Report:

Select the Final Report box if the report being submitted is the recipient's final report for the period of performance. The recipient submits the final RSA-17 report for the reporting period in which the Reporting Period End Date (line 6) is the same as the end of the period of performance.

Refer to the example table in the instructions for line 6 above.

- For a recipient that 1) did not receive a carryover year or 2) has obligated all its FFY 2025 Federal funds by September 30, 2025, the Reporting Period End Date and the end of the period of performance would both occur on September 30, 2025. In this case, the 4th quarter report for the period ending September 30, 2025, would be the final report and is due 120 calendar days after September 30, 2025 (January 28, 2026).
- For a recipient that receives a carryover year for the FFY 2025 grant award and RSA extends the period of performance for that award, the Reporting Period End Date and the end of the period of performance would both occur on September 30, 2026. In this case, the FFY 2025 VR award 8th quarter report, for the period ending September 30, 2026, would be the final report and would be due January 28, 2027 – 120 calendar days after the end of the period of performance for the FFY 2025 grant award (including the carryover period).

Also see the definitions of "Financial Obligations" and "Period of Performance" in the definitions section.

8. UEI Number:
   - Data entry not required.

   The Unique Entity Identifier (UEI) is the official identifier for doing business with the U.S. Government. The UEI associated with the Federal Award Identification Number, line 1, in ED's grant management system is the default entry. This is the UEI listed in Box 8 of the GAN. The UEI number must be active and currently registered in the System for Award Management (SAM). Entities registering in SAM.gov are assigned a UEI as part of the registration process.

9. Recipient Account Number or Identifying Number:
   - Data entry optional.
   - Data entry limited to 30 characters.

   Enter an account number or other identifying number from the statewide accounting system, assigned by the recipient to the award. This number can be used for grant management and is not required by ED or RSA.

B. Federal Funds

10. Total Federal Funds Awarded:
    - Data entry not required.

    This data represents the total amount of Federal funds awarded by ED to the recipient for the specific FFY as of the end of the reporting period. The amount listed may change due to award adjustments that could reflect funds awarded by continuing resolutions, reductions for maintenance of effort shortfalls required by statute, recipient-requested inter-agency transfers or deobligations, and/or the receipt or relinquishment of Federal funds during the reallotment process.

11. Federal Cash Receipts:
Enter the cumulative amount of Federal grant funds that the recipient has drawn down and received from the amount awarded as listed above on line 10, Total Federal Funds Awarded, per ED's grants management system. This amount (Federal cash receipts) is obtained by running a G5 External Award Activity Report using date parameters.

- The date parameters entered in the G5 will be the start date of the award (i.e., October 1st) and the reporting period end date.
- For final reports, the date parameters entered in the G5 will be the start date of the award and the date award funds were liquidated. Because a recipient may draw down funds during the liquidation period (ending on January 28th) or upon receipt of an approved late liquidation request, the end date of the G5 External Award Activity Report may be past the end of the period of performance of the award. This does not change the reporting period end date on the form.
- Once the External Award Activity Report data populates, recipients will report the Net Draws data for Federal Cash Receipts in line 11.

Recipients may want to maintain copies of the G5 External Award Activity Reports as supporting documentation that verifies the accuracy of the amount reported. Recipients should not include requests for drawdowns that were not received during the reporting period.

12. Federal Cash Disbursements:
Enter the cumulative amount of actual disbursements made by the recipient from the Federal VR funds drawn down and received during the reporting period from line 11, Federal Cash Receipts. Disbursements are the sum of actual cash expenditures made for direct charges for goods and services, the amount of indirect expenses charged to the award, and the amount of payments made to contractors/vendors.

Note: Unliquidated obligations are not included in this amount even if recipients use accrual-based accounting.

13. Federal Cash on Hand (line 11 minus line 12):

- Data entry not required.

If more than three business days of cash are on hand, recipients must provide an explanation on line 42, Remarks, as to why the drawdown was made prematurely or other reasons for the excess cash. Recipients must minimize the time elapsing between drawdown of Federal funds and disbursement by the recipient in accordance with Cash Management Improvement Act (CMIA) requirements and ED guidance.

14. Federal Share of Expenditures:
Enter the total amount of expenditures incurred with Federal VR funds (also known as Federal expenditures). *Do not include expenditures*

incurred with program income (e.g., program income received as SSA reimbursements for VR services provided to SSA recipients and beneficiaries or Ticket to Work payments for specific beneficiary work and earnings milestones) received by the recipient on this line. Such program income expenditures will be reported in Section C, Federal Program Income.

- For reports prepared on a cash basis, the recipient should report Federal fund expenditures as the sum of cash disbursements for direct charges for goods and services, the amount of indirect expenses charged, and the amount of payments made to contractors/vendors.
- For reports prepared on an accrual basis, recipients should report Federal fund expenditures as the sum of cash disbursements for direct charges for goods and services, the amount of indirect expenses incurred, the amount of payments made to contractors/vendors, and the increase or decrease in the amounts owed by the recipient for goods received and services performed by employees, contractors/vendors, and other payees. An accrued expenditure, for purposes of the RSA-17, is recorded when the recipient elevates an obligation to an expenditure at the time the liability to pay has been created, as opposed to when the expenditure is actually paid. Unliquidated obligations for amounts owed for goods or services not yet elevated to a liability to pay are reported on line 18.

Recipients must include the total of all Federal VR fund expenditures incurred on line 14, and must break out expenditures for certain categories, as described for lines 15, 16 and 17. For example, recipients must report the amount expended on pre-employment transition services (which is reported on line 14 as part of the total of Federal Share of Expenditures) separately in line 15, Federal Expenditures Incurred for the Provision of Pre-employment Transition Service Activities and Certain Other VR Services Needed to Access or Benefit from Pre-Employment Transition Services Provided.

Refunds to Federal funds may require an adjustment to this data element, including reports previously submitted. Grantees should contact their Financial Management Specialist for technical assistance.

15. <u>Federal Expenditures Incurred for the Provision of Pre-employment Transition Service Activities and Certain Other VR Services Needed to Access or Benefit</u> <u>from Pre-Employment Transition Services</u>:

Expenditures reported in this section are only for activities charged to Federal funds reserved for providing or arranging for the provision of pre-employment transition services.

Report in this category all expenditures for pre-employment transition service activities and certain other VR services needed by a student with

a disability to access or benefit from pre-employment transition services, which are also included in the total amount of Federal funds reported on line 14, Federal Share of Expenditures. Recipients are responsible for ensuring the tracking of time and attendance includes the ability to positively track staff time spent providing the "required," "authorized," and "coordination" pre-employment transition service activities, respectively. Only in this manner, can a recipient ensure that it can provide all "required" pre-employment transition services needed by students with disabilities in the State and coordination activities, as described in Section 113(b) and (d), respectively, of the Rehabilitation Act, before providing other "authorized" pre-employment transition services permitted under Section 113(c) of the Rehabilitation Act.

Include in this section only those expenditures incurred for services for which the reserved funds may be used (i.e., required, authorized and coordination pre- employment transition service activities) as well as other VR services necessary to access or benefit from the required pre-employment transition services (see Notice of Policy Interpretation (85 FR 11848 (Feb. 28, 2020))). A recipient may use the reserved funds to pay for certain VR services that are needed by any student with a disability to access pre-employment transition services (e.g., auxiliary aids, interpreter and reader services); however, the recipient may use the reserved funds to pay for other VR services that a student with a disability needs to benefit from pre-employment transition services only if that student has been determined eligible for the VR program and those other services have been identified on the individualized plan for employment as necessary to participate in the pre-employment transition services (Id.).

Do not include recipient administrative expenses related to rent, utilities, etc., in this section because Section 110(d)(2) of the Rehabilitation Act prohibits the recipient from using the reserved funds to pay for the administrative costs it incurs in providing or arranging for the provision of pre-employment transition services.

a. Required and Coordination Pre-employment Transition Service Activities and Other VR Services that Support Access to and Participation in Pre-Employment Transition Services (line 15 minus 15b)
   - Data entry not required.

b. Authorized Pre-employment Transition Service Activities:
   Enter the total amount of Federal expenditures for the provision of authorized pre-employment transition service activities charged to the funds required to be reserved for pre-employment transition services. *Do not include authorized pre-employment transition service activities not charged to the funds reserved for pre-employment transition services.*

16. Federal Share for Establishment of Facilities for CRP Purposes:
Enter the Federal share of expenditures incurred for the establishment of facilities for CRP purposes, *which was also included in the total amount of Federal expenditures reported on line 14, Federal Share of Expenditures*. Include only those Federal expenditures on line 16 for activities that would meet the definition of "establishment of a facility for a public or nonprofit community rehabilitation program" at 34 C.F.R. § 361.5(c)(17). Do not include expenditures for staffing or other costs associated with establishment projects, such as those additional costs included in the definition of "establishment, development, or improvement of a public or nonprofit community rehabilitation program" at 34 C.F.R. § 361.5(c)(16). If no funds were used for this purpose during the reporting period, enter zero on this line.

17. Federal Share for Construction of Facilities for CRP Purposes:
Enter the Federal share of expenditures incurred for the construction of facilities for CRP purposes, *which was also included in the total amount of Federal expenditures reported on line 14, Federal Share of Expenditures.* Only include those expenditures, paid with Federal funds, for activities that would meet the definition of "construction of a facility for a public or nonprofit community rehabilitation program" at 34 C.F.R. § 361.5(c)(10). Do not include expenditures for staffing or other costs associated with establishment projects, such as those additional costs included in the definition of "establishment, development, or improvement of a public or nonprofit community rehabilitation program" at 34 C.F.R. § 361.5(c)(16). If no funds were used for this purpose during the reporting period, enter zero on this line.

18. Federal Share of Unliquidated Obligations:
Enter the Federal portion of unliquidated obligations incurred by the recipient. Unliquidated obligations include orders placed for property and services, contracts, and similar transactions during a given period that require payment by the recipient but have not yet been paid or charged to the VR grant award. These include direct and indirect obligations for goods and services incurred by the recipient, as well as amounts due to contractors/vendors. When submitting a final RSA-17 report, this data element should be zero because all obligations must be liquidated prior to the submission of the final financial reports and grant closure.

Do not include on line 18 –

- Expenditures reported on line 12, Federal Cash Disbursements;
- Expenditures reported on line 14, Federal Share of Expenditures; and
- Future fund commitments for which an obligation or expense has not been incurred during the reporting period, in accordance with 34 C.F.R. § 76.707.

Recipients have 120 calendar days from the end of the period of performance to liquidate Federal obligations (2 C.F.R § 200.344(c)). If recipients are unable to liquidate all obligations within the liquidation period, 120 calendar days after the period of performance ends, recipients must submit a late liquidation request in accordance with ED's guidance. If approved, the recipient must liquidate the approved obligations and submit the final report within 30 days after the approved late liquidation extension date.

Requirements for obligations, located at 34 C.F.R. § 76.707 of EDGAR, identify when obligations are made for Departmental awards. All recipients, regardless of the basis of accounting used, must assign, track, and report unliquidated obligations to RSA, based on their assignment to a Federal or non-Federal fund source.

19. Total Federal Share (sum of lines 14 and 18):
    - Data entry not required.

20. Unobligated Balance of Federal Funds (line 10 minus line 19):
    - Data entry not required.

    For the final report, this figure represents the amount of Federal VR funds awarded that the recipient did not obligate or draw down.

C. Federal Program Income

21. Total Federal Program Income Received:

    Enter the total amount of program income received by the recipient under the VR program as of the end of the reporting period. *All program income received by the VR program is to be reported as Federal program income earned. This means that recipients must report, and use, program income earned under the VR program as an addition to the Federal grant funds received under the VR program (34 C.F.R. § 361.63(c)(3)(i)). In other words, recipients may not use program income to reduce the amount of the Federal VR award.*

    Program income is considered received in the FFY in which the recipient receives the funds (34 C.F.R. § 361.63 and 2 C.F.R. § 200.1). Therefore, the amount reported should not change after the recipient submits its 4th quarter report for the FFY of appropriation in which the program income is received. Any program income received during the subsequent FFY, even if the recipient is operating under a carryover year from the prior FFY's grant award, must be reported on the RSA-17 for the next FFY's grant award.

    While all program income received by the recipient, including reimbursements and Ticket to Work payments from the Social Security Administration (SSA), is entered on line 21, the expenditure of program income is reported below on lines 22 through 26 as appropriate. For example, if the VR program receives $100,000 in SSA payments and

expends those funds in the VR program, the recipient must include the $100,000 on line 21 and then report the expenditure (disbursement) of those funds on line 22.

A recipient may choose to transfer SSA payments received by the VR program to certain formula grant programs funded under the Rehabilitation Act, as permitted by Section 108 of the Rehabilitation Act and 34 C.F.R. § 361.63(c)(2). The authority to transfer program income received from SSA in accordance with Section 108 of the Rehabilitation Act and 34 C.F.R. § 361.63(c)(2) is unique *only to program income received from SSA. There is no legal authority for the recipient to transfer other forms of program income earned under the VR program to another program for that program's use*. Therefore, only SSA reimbursement program income transferred to other eligible programs can be reported on lines 23 through 26. Each program receiving SSA payments for its use must report the funds as program income received for that program.

For example, if the VR program receives $100,000 in SSA payments, but transfers the entire amount to the Independent Living for Older Individuals who are Blind (OIB) program, the VR program must report the receipt of the $100,000 on line 21 and the expenditure of those funds under line 24 below. In so doing, the VR program would report that the funds were "disbursed" by reporting the transfer on line 24, SSA Payments Transferred to the Independent Living Services for Older Individuals who are Blind Program. In addition, in this example, the OIB program would report the program income on its SF-425 line 10l as received, report the program income as transferred from the VR program in the Remarks section on line 12, Remarks, on its own SF-425.

Program income from SSA payments transferred to other eligible programs is restricted to the grant award year that corresponds to the FFY of appropriation in which it was received in the VR program. For example, SSA payments received in the VR program in FFY 2025 may be transferred to the OIB program for expenditures and reporting purposes for its FFY 2025 OIB award. This means the transfer may occur during the FFY 2025 grant year or, in rare circumstances and when applicable, during the carryover year of the FFY 2025 OIB grant award, which occurs in FFY 2026. In the rare event that the program income is expended during the FFY 2025 carryover year (which occurs in FFY 2026), all program income information must be reported as occurring during the FFY 2025 period of performance, not the FFY 2026 grant award's period of performance.

Note: *In accordance with 34 C.F.R. § 361.63(c)(3)(ii), "to the extent that program income funds are available, a State must disburse those funds (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before*

requesting additional funds from the Department." This means recipients may not request a drawdown of Federal funds from the G5 if there is an undisbursed balance of program income, *rebates, refunds, contract settlements, audit recoveries, or interest earned on such funds.*

Program income received in the VR program and transferred to the account of an allowable program is considered disbursed for purposes of the VR program and this requirement.

22. Program Income Expended in VR Program in Accordance with Addition Alternative:
Enter the amount of program income reported on line 21, Total Federal Program Income Received, that was expended to supplement the Federal share of the total expenditures of the VR program (in other words, in addition to the Federal VR expenditures incurred). The amount reported represents actual disbursements under the VR program and does not include any SSA payments transferred to other eligible programs, reported in lines 23 through 26. The expenditure of all program income funds must meet the same standards of allowability, reasonableness, and allocability (2 C.F.R. §§ 200.403 through 200.405) that are applicable to Federal funds (Section 108 of the Rehabilitation Act and 34 C.F.R. § 361.63(c)(3), and 2 C.F.R. § 200.307(b)(2).

23. SSA Payments Transferred to the State Independent Living Services (SILS) Program:
Enter the amount of SSA program income reported on line 21, Total Program Income Received under the VR program, but transferred from the VR program to the SILS program, as permitted by Section 108 of the Rehabilitation Act and 34 C.F.R. § 361.63(c)(2). Since the designated State entity (DSE) is the only entity designated by the State to administer the SILS grant received under Title VII of the Rehabilitation Act, the VR agency must transfer SSA program income funds for use in the SILS program to the DSE, including when the DSE is not the VR agency. The SILS program should consult with the U.S. Department of Health and Human Services regarding how transferred program income received should be reported for its program on its financial reports.

24. SSA Payments Transferred to the Independent Living Services for Older Individuals Who are Blind (OIB) Program:
Enter the amount of SSA program income reported on line 21, Total Program Income Received under the VR program, but transferred by the VR program to the OIB program, as permitted by Section 108 of the Rehabilitation Act and 34 C.F.R. § 361.63(c)(2). This amount must also be reported as program income earned on the corresponding SF-425 submitted by the OIB program. See the instructions for line 21, Total Federal Program Income Received, for additional information.

25. SSA Payments Transferred to the Client Assistance Program (CAP):
Enter the amount of SSA program income reported on line 21, Total Federal Program Income Received under the VR program, but transferred by the VR program to the CAP, as permitted by Section 108 of the Rehabilitation Act and 34 C.F.R. § 361.63(c)(2). This amount must also be reported as program income earned on the corresponding SF-425 submitted by the CAP. See the instructions for line 21, Total Federal Program Income Received, for additional information.

26. SSA Payments Transferred to the State Supported Employment Services (Supported Employment) Program:
Enter the amount of SSA program income reported on line 21, Total Federal Program Income Received under the VR program, but transferred by the VR program to the Supported Employment program, as permitted by Section 108 of the Rehabilitation Act and 34 C.F.R. § 361.63(c)(2). This amount must also be reported as program income earned on the corresponding SF-425 submitted by the Supported Employment program. See the instructions for line 21, Total Federal Program Income Received for additional information.

27. Unexpended Program Income (line 21 minus lines 22, 23, 24, 25 and 26):
- Data entry not required.

When submitting a final report, if all program income is expended by (date), this line should be zero.

D. Reporting Non-Federal Share in the FFY of Appropriation (1st through 4th Quarter)

Overview: Information from this section is used to ensure the recipient provides the requisite cost share of non-Federal expenditures incurred during the FFY of appropriation. At the end of the 4th quarter, the recipient's non-Federal share is based upon the sum of lines 28, Total Non-Federal Share of Expenditures (4th Quarter) and 29, Non-Federal Share of Unliquidated Obligations (4th Quarter). In using this calculation, RSA includes the recipient's unliquidated non-Federal obligations with the expenditures. As such, the recipient's non-Federal share of unliquidated obligations is credited toward meeting the recipient's match requirement. The match calculated by adding the amounts on lines 28 and 29, as just described, at the end of the FFY of appropriation (i.e., at the end of the 4th quarter), determines whether the recipient has *preliminarily* satisfied its match requirement for the grant award and, thus, is able to carry Federal funds over to the subsequent fiscal year to the extent such funds remain available for obligation. In Section E below, recipients report on line 32 the amount of liquidations from the amount of non-Federal unliquidated obligations incurred in the FFY of appropriation, as reported on line 29, but liquidated during the carryover year, which will be used to determine the *final* match for the award based on final report data. In other words, final match for the award is the lesser of lines 28 and 29 on the 4th quarter RSA-17 report compared to lines 28 and 32 on the final RSA-17 report.

Third-party in-kind contributions are not an allowable source of non-Federal share under the VR program and; therefore, should not be reported as non-Federal expenditures (34 C.F.R. § 361.60(b)(2)). However, third-party in-kind contributions are permitted for inclusion in the VR agency's share of one-stop infrastructure costs even though they are not reported on the RSA-17 report.

28. Total Non-Federal Share of Expenditures (1st through 4th Quarter): Enter the total amount of non-Federal VR expenditures incurred for the reporting period. Do not include expenditures incurred with program income because such expenditures cannot be used to meet the non-Federal share requirement (34 C.F.R. § 361.63(c)(4)). Do not include non-Federal unliquidated obligations, as those will be reported on line 29.

Include on line 28 all non-Federal expenditures incurred under the VR program, including those in excess of the amount required to satisfy the non-Federal share (match) requirement under the VR program (i.e., 21.3 percent of the State's total expenditures under the VR program) (34 C.F.R. § 361.60(a)(1) and (b)(1)).

Recipients must report on line 28 all non-Federal expenditures incurred under the VR program, regardless of the source of funding, even if the amount reported exceeds the amount of non-Federal share required to match the total Federal funds awarded. This information is necessary for RSA to assess whether the State has met its maintenance of effort requirement under Section 111(a)(2)(B) of the Rehabilitation Act and 34 C.F.R. § 361.62.

Section 111(a)(2)(b) of the Rehabilitation Act, its implementing regulations at 34 C.F.R. §§ 361.60 and 361.62, and related policy statements cite the phrase expenditures from non-Federal sources under the VR services portion of the Unified or Combined State Plan (State plan) when referring to non-Federal share, which includes match and maintenance of effort. RSA has previously provided clarification that expenditures from non-Federal sources under the State plan used to support the VR program *must* be included as non-Federal share (match) when reporting on the RSA-17. This includes only those expenditures that (1) are made from permissible revenue sources, (2) meet allowability requirements, and (3) are allocable to the VR program consistent with the State plan. *Any non-Federal expenditures reported on the RSA-17 must meet all three requirements.* ***Furthermore, any expenditure that meets all three requirements must be reported to ensure the maintenance of effort requirements are met.***

Note: For American Samoa, Guam, the Virgin Islands, and the Northern Mariana Islands, DO NOT include the $200,000 non-Federal share waiver granted in accordance with Section 601(b) of Public Law 98-454, known as the 1984 Omnibus Territorial Act. RSA includes the $200,000

waiver automatically when calculating the recipient's non-Federal share requirement.

The amount on line 28 must include the non-Federal share of actual cash disbursements or expenditures (less any non-Federal portion of rebates, refunds, or other applicable credits assignable to the VR award), including payments to contractors, and any expenses included in line 28a, Non-Federal Share for Establishment of Facilities for CRP Purposes, and line 28b, Non-Federal Share for Construction of Facilities for CRP Purposes.

Note: This field is locked for editing after the 4th quarter. Refunds to non-Federal funds may require an adjustment to this data element, including reports previously submitted through the 4th quarter. Grantees should contact their Financial Management Specialist for technical assistance.

a. Of the Amount Reported in Line 28, the Non-Federal Share for Establishment of Facilities for CRP Purposes (1st through 4th Quarter): Enter the non-Federal share of expenditures, also included on line 28, Total Non- Federal Share of Expenditures, incurred during the FFY of appropriation, for the establishment of facilities for CRP purposes. Non-Federal expenditures for the purpose of establishing a facility for a CRP will not be counted toward the State's maintenance of effort (34 C.F.R. § 361.62(b)); however, these non-Federal expenditures count toward satisfying the State's match requirement.

   Do not include Federal funds used for this purpose. Only include those expenditures, paid with non-Federal funds, for activities that would meet the definition of "establishment of a facility for a public or nonprofit community rehabilitation program" at 34 C.F.R. § 361.5(c)(17). *Do not* include the expenditures reported on line 28 for staffing or other costs associated with establishment projects, such as those additional costs included in the definition of "establishment, development, or improvement of a public or nonprofit community rehabilitation program" at 34 C.F.R. § 361.5(c)(16); rather, such costs will be reported on line 39a along with the expenditures reported here in line 28a. If no funds were used for purposes identified in 34 C.F.R. § 361.5(c)(17) during the reporting period, enter zero on this line.

b. Of the Amount Reported in Line 28, the Non-Federal Share for Construction of Facilities for CRP Purposes (1st through 4th Quarter): Enter the non-Federal share of expenditures, also included on line 28, Total Non-Federal Share of Expenditures, incurred during the FFY of appropriation, for the construction of facilities for CRP purposes. Non-Federal expenditures for the purpose of constructing a facility for a CRP will not be counted toward the State's maintenance of effort (Section 101(a)(17)(C) and 34 C.F.R. § 361.62(b)).

Do not include Federal funds used for this purpose. Only include those expenditures, paid with non-Federal funds, for activities that would meet the definition of "construction of a facility for a public or nonprofit community rehabilitation program" at 34 C.F.R. § 361.5(c)(10). Do not include the expenditures reported on line 28 for staffing or other costs associated with establishment projects, such as those additional costs included in the definition of "establishment, development, or improvement of a public or nonprofit community rehabilitation program" at 34 C.F.R. § 361.5(c)(16); rather, such costs will be reported on line 39a along with the expenditures reported here in line 28b. If no funds were used for purposes identified in 34 C.F.R. § 361.5(c)(10) during the reporting period, enter zero on this line.

29. Non-Federal Share of Unliquidated Obligations (1st through 4th Quarter): Enter the amount of unliquidated obligations to be paid with non-Federal funds meeting the non-Federal share requirements in 34 C.F.R. § 361.60(b). Non- Federal share can only be credited as match when obligated, in accordance with 34 C.F.R. § 76.707, in the FFY of appropriation for an award (i.e., October 1 through September 30). See line 32 for information about unliquidated obligations counted as non-Federal share that are liquidated after the 4th quarter report for the FFY of appropriation (i.e., in the carryover year). When the 4th quarter is marked final, enter zero on line 29.

    Non-Federal share *expected* from third-party cooperative arrangement (TPCA) certified expenditures of public agency staff salaries, when the TPCA staff has not yet completed the work, may not be included as an unliquidated obligation (or expenditure) because these expenditures cannot be certified until after the staff works and has been paid for the requisite number of hours. Pursuant to 34 C.F.R. § 76.707(b), an obligation for services performed by State agency employees, including TPCA staff, is incurred at the time the work is performed.

30. Number reserved. This element was moved to line 28a.

31. Number reserved. This element was moved to line 28b.

E. Status of Unliquidated Obligations Reported on 4th Quarter RSA-17 Report

Overview: As noted in Section D above, all non-Federal expenditures and obligations used for match purposes must be incurred during the FFY of appropriation. During the carryover year, the recipient liquidates unliquidated obligations reported on line 29 as having been incurred by the end of the FFY of appropriation but not liquidated by that time. All unliquidated obligations reported on line 29 for match purposes, incurred prior to the end of the FFY of appropriation, must be liquidated by the end of the liquidation period for that award (i.e., 120 calendar days after the end of the 8th quarter (period of

performance)). However, RSA recognizes unliquidated obligations sometimes fall through during the carryover year and must be cancelled or deobligated. When this occurs, the recipient can no longer count those obligations toward satisfying its match requirement.

If non-Federal unliquidated obligations from the end of the 4th quarter, needed to carry over funds, are cancelled, but the recipient had access to additional non-Federal funds prior to end of the 4th quarter, then the recipient may adjust its accounting records to reassign Federal expenditures paid prior to the end of the FFY of appropriation to non-Federal funds to increase the amount of non-Federal share the recipient reported as incurred by the end of the FFY of appropriation. The recipient has the flexibility during the carryover year to make accounting adjustments with respect to expenditures incurred prior to the end of the FFY of appropriation to ensure it continues to satisfy its non-Federal share and/or maintenance of effort requirement. Such accounting adjustments must be consistent with the State and recipient policies/procedures and Generally Accepted Accounting Principles (GAAP). As a result, based on the Final RSA-17 report, *the final total match provided by a recipient is the sum of lines 28, Total Non-Federal Share of Expenditures (4th Quarter) and 32, Non-Federal Expenditures for Unliquidated Obligations Reported on Line 29 - Liquidated After the 4th Quarter (8th Quarter).* To be clear, the amount listed on line 32 only reflects the liquidation in the carryover year of non-Federal obligations incurred prior to the end of the FFY of appropriation*. These are not new obligations, or expenditures incurred during the carryover year that are reported below on line 33.*

32. <u>Non-Federal Expenditures for Unliquidated Obligations Reported on Line 29 - Liquidated After the 4th Quarter (5th through 8th Quarter):</u>
This line is only used when the FFY of appropriation 4th quarter report is not submitted as the Final report. The State must have met the requirements of Section 19 of the Rehabilitation Act for carrying over funds and reported unliquidated obligations on line 29 to report an amount on this line item. If the State did not qualify to carry over Federal funds because it did not satisfy the requirements of Section 19, the recipient must mark its 4th quarter report final and the recipient has 120 days after the end of the period of performance to liquidate all obligations unless a late liquidation request has been approved by RSA. When the 4th quarter is marked final under these circumstances, line 32 should remain blank.

For recipients in States that met the requirements of Section 19 of the Rehabilitation Act to carry over Federal funds, use line 32 to enter the amount of liquidations from the amount of non-Federal unliquidated obligations reported on line 29, Non-Federal Share of Unliquidated Obligations, of the recipient's 4th quarter RSA-17 report that were liquidated during a subsequent reporting period. The amount reported on line 32 reflects only the non-Federal obligations that were reported on line 29 as incurred on or prior to September 30 of the FFY of

appropriation, but which were not liquidated by that date; line 32 reflects the amount of those reported unliquidated obligations that have been liquidated during the carryover year. Recipients may not report new non-Federal expenditures on line 32 (*i.e.*, non-Federal expenditures incurred during the carryover year should be reported on line 33). Non-Federal share can only be counted as match when obligated by September 30 of the FFY of appropriation of an award as indicated on line 29 of the recipient's 4th quarter RSA-17 and liquidated within 120 calendar days after the end of the period of performance for that award.

Unliquidated obligations reported on the 4th quarter report (i.e., those that were incurred during the FFY of appropriation) that are cancelled during the carryover period, or otherwise not liquidated after the FFY of appropriation, may not be used toward satisfying the match requirement for the FFY of appropriation for that award because those obligations never came to fruition for the VR program. This means, a State may not have access to its full Federal award for obligation and use in the carryover year if there were no excess non-Federal expenditures incurred prior to September 30 of the FFY of appropriation to cover the loss of these unliquidated obligations that "fell through" in the carryover year. Funds for obligations reported on line 29, Non-Federal Share of Unliquidated Obligations, cancelled during the carryover period, may not be re-obligated or liquidated for expenditures incurred during the carryover period and counted as match for the period of performance for the award because, pursuant to Section 19 of the Rehabilitation Act, match must be satisfied by the end of the FFY of appropriation in order to carry over funds to the subsequent year.

If non-Federal unliquidated obligations from the end of the 4th quarter, needed to carry over funds, are cancelled, but the recipient had access to additional non- Federal funds prior to end of the 4th quarter, then the recipient may adjust its accounting records to reassign Federal expenditures paid prior to the end of the FFY of appropriation to non-Federal funds to increase the amount of non-Federal share the State reported as having incurred by the end of the FFY of appropriation. This may result in a surplus of Federal cash on hand because Federal funds previously used to pay for an expenditure have now been adjusted to be paid with non-Federal funds. In this instance, the RSA-17 submitted by the recipient for the 4th quarter of the FFY of appropriation must be revised to reflect an increased non-Federal share of expenditures, line 28, and a decreased amount of Federal expenditures, line 14. The recipient should ensure its internal controls address how the excess cash on hand is managed to ensure compliance with the Cash Management Improvement Act (CMIA) requirements and note in the Remarks section (line 42) of the 4th quarter RSA-17 the reason the Federal expenditures are less than drawdowns and disbursements in lines 11 and 12, respectively.

The recipient is responsible for ensuring that all RSA-17 data submitted, including changes, are reflected in the State's accounting system and consistent with the State's and recipient's accounting policies/procedures and GAAP. Accounting adjustments to expenditures incurred in a prior period (e.g., through the 4th quarter) require the recipient to request a revision to the prior reporting period submission that coincides with when the expenditure occurred.

a. Of the Amount Reported in Line 32, the Amount that was Liquidated for Non-Federal Share of Establishment of Facilities for CRP Purposes:
This line is for recipients in States that met the requirements of Section 19 of the Rehabilitation Act to carry over Federal funds and reported non-Federal unliquidated obligations in line 29 on the 4th quarter RSA-17 that included obligations for the Establishment of Facilities for CRP Purposes.

Use line 32a to enter the total amount of liquidations associated with non-Federal unliquidated obligations for the Establishment of Facilities for CRP Purposes included in the non-Federal unliquidated obligations reported on line 29, Non-Federal Share of Unliquidated Obligations (1st through 4th Quarter).

b. Of the Amount Reported in Line 32, the Amount that was Liquidated for Non-Federal Share of Construction of Facilities for CRP Purposes:
This line is for recipients in States that met the requirements of Section 19 of the Rehabilitation Act to carry over Federal funds and reported non-Federal unliquidated obligations in line 29 on the 4th quarter RSA-17 that included obligations for the Construction of Facilities for CRP Purposes.

Use line 32a to enter the total amount of liquidations associated with non-Federal unliquidated obligations for the Construction of Facilities for CRP Purposes included in the non-Federal unliquidated obligations reported on line 29, Non-Federal Share of Unliquidated Obligations (1st through 4th Quarter).

F. Reporting Non-Federal Expenditures in the Carryover Year (5th through 8th Quarter)

33. Additional New Non-Federal Expenditures (5th through 8th Quarter):
For purposes of the VR program, a recipient must report all non-Federal expenditures in the FFY in which those expenditures are incurred for purposes of satisfying the maintenance of effort (MOE) requirement at Section 111(a)(2)(B) of the Rehabilitation Act because MOE is determined on an FFY basis, not on the basis of a period of performance for an entire grant award. Enter on line 33 the amount, if any, of new non-Federal expenditures incurred during the carryover year. The

amount on line 33, if any, represents new expenditures incurred during the carryover year, in accordance with 34 C.F.R. § 76.707. The amount reported on line 33 must not include the liquidation of obligations that were incurred during the FFY of appropriation, and reported on line 29, then liquidated during the carryover year and reported on line 32. The non-Federal expenditures reported on line 33, if any, will not count toward the match requirement of either the prior FFY year of appropriation or the current FFY, but will count toward the current FFY's MOE requirement.

a. Of the Amount Reported in Line 33, the Non-Federal Expenditures for Establishment of Facilities for CRP Purposes (5th through 8th Quarter): Enter the non-Federal share of expenditures, also included on line 33, Additional New Non-Federal Expenditures, incurred during the carryover year, for the establishment of facilities for CRP purposes. Non-Federal expenditures for the purpose of establishing a facility for a CRP will not be counted toward the State's maintenance of effort (34 C.F.R. § 361.62(b)).

   Do not include Federal funds used for this purpose. Only include those expenditures, paid with non-Federal funds, for activities that would meet the definition of "establishment of a facility for a public or nonprofit community rehabilitation program" at 34 C.F.R. § 361.5(c)(17). Do not include expenditures for staffing or other costs associated with establishment projects, such as those additional costs included in the definition of "establishment, development, or improvement of a public or nonprofit community rehabilitation program" at 34 C.F.R. § 361.5(c)(16); rather, such costs will be reported on line 39a along with the expenditures reported here in line 33a. If no funds were used for purposes identified in 34 C.F.R. § 361.5(c)(17) during the reporting period, enter zero on this line.

b. Of the Amount Reported in Line 33, the Non-Federal Expenditures for Construction of Facilities for CRP Purposes (5th through 8th Quarter): Enter the non-Federal share of expenditures, also included on line 33, Additional New Non-Federal Expenditures, incurred during the carryover year, for the construction of facilities for CRP purposes. Non-Federal expenditures for the purpose of constructing a facility for a CRP will not be counted toward the State's maintenance of effort (Section 101(a)(17)(C) and 34 C.F.R. § 361.62(b)).

   Do not include Federal funds used for this purpose. Only include those expenditures, paid with non-Federal funds, for activities that would meet the definition of "construction of a facility for a public or nonprofit community rehabilitation program" at 34 C.F.R. § 361.5(c)(10). Do not include expenditures for staffing or other costs associated with establishment projects, such as those

additional costs included in the definition of "establishment, development, or improvement of a public or nonprofit community rehabilitation program" at 34 C.F.R. § 361.5(c)(16); rather, such costs will be reported on line 39a along with the expenditures reported here in line 33b. If no funds were used for purposes identified in 34 C.F.R. § 361.5(c)(10) during the reporting period, enter zero on this line.

34. Number reserved. This element was moved to line 33a.

35. Number reserved. This element was moved to line 33b.

G. Indirect Expenses

Indirect costs (2 C.F.R. § 200.1) are generally charged to Federal awards via an approved indirect cost rate or cost allocation plan. Any recipient that wishes to claim indirect costs under Federal grants through an indirect cost rate must prepare an indirect cost rate proposal (2 C.F.R. § 200.1) and submit it to the cognizant Federal agency for indirect costs for approval (2 C.F.R. part 200, Appendix VII, paragraph D). Recipients claiming indirect expenses based on a cost allocation plan (2 C.F.R. part 200, Appendix VII, paragraph F.3), rather than an indirect cost rate, must develop, document, maintain for audit, or submit, as appropriate, a narrative cost allocation methodology for indirect costs to the cognizant agency for review, negotiation, and approval. Recipients must ensure internal controls are adequate to report indirect costs timely and accurately.

Note: Indirect costs will be reported in Section F, line 36 and Section G, Administrative Expenditures, line 37, as well as the applicable Federal, Program Income, and non- Federal sections (B, C and D). Cost allocation plan costs will not be reported in Section F, line 36, but will be reported in Section G, Administrative line 37, as well as the applicable Federal, Program Income, and non-Federal sections (B, C and D). However, RSA requires grantees with either cost allocation plans or indirect cost rates to identify the Federal cognizant agency for indirect costs in line 36.

Recipients with indirect cost rates that change between State fiscal years must use separate rows for each approved indirect cost rate applicable to expenditures incurred during the period of performance.

36. Federal Cognizant Agency for Indirect Costs:
Enter the name of the Federal cognizant agency that approved the recipient's indirect cost rate.

a. Type of Rate:
Select whether the approved indirect cost rate is the Department Temporary Rate, De Minimis Rate, Provisional, Predetermined, Final, or Fixed rate. A recipient that does not have an indirect cost rate agreement approved by its cognizant agency for indirect costs, and that is using ED's approved (beyond the 90-day temporary

period) temporary indirect cost rate of 10 percent of budgeted direct salaries and wages, or the de minimis rate of 15 percent of modified total direct cost (MTDC) must list its indirect cost rate as a Department Temporary Rate or De Minimis Rate.

b. Rate:
Enter the approved indirect cost rate(s) in effect during the reporting period as a number, not a fraction or numerical reflection of the percent (e.g., enter "8.5" if the approved rate is 8.5 percent, instead of 8½ or 0.085).

c. Period From:
Enter the beginning effective date(s) for the approved indirect cost rate(s).

d. Period To:
Enter the ending date(s) for the approved indirect cost rate(s).

e. Base:
Enter the amount of the base against which the approved indirect cost rate(s) was applied. The base includes expenditures to which the approved indirect cost rate may be applied (e.g., salaries, wages and fringe benefits).

f. Amount Charged (line 36b multiplied by line 36e):
- Data entry not required.

g. Federal Share:
Enter the Federal share of the amount in 36f, Amount Charged.

h. Totals:
- Data entry not required.

H. Select Federal and Non-Federal Expenditures (Include Expenditures Incurred with Program Income — Do NOT Include Unliquidated Obligations)

The expenditures reported in this section are a subset of those in Sections B, C and D, and will not reconcile to those data elements.

37. Administrative Expenditures:
Include on this line all expenditures incurred in the performance of administrative functions under the VR program, including expenses related to program planning, development, monitoring, evaluation, and infrastructure expenditures for the one- stop service delivery system. See definition of "administrative costs," for purposes of the VR program, at 34 C.F.R. § 361.5(c)(2). This should include both direct and indirect administrative expenditures (including those reported in Line 36h), regardless of whether expenditures are charged in accordance with an

approved indirect cost rate or cost allocation plan. Include program income expenditures, but do not include any unliquidated obligations. Examples include, but are not limited to expenditures for –

a. Quality assurance;
b. Budgeting, accounting, financial management and information systems;
c. Providing program information to the public;
d. Technical assistance and support services to other State agencies, private nonprofit organizations, and businesses and industries, except for technical assistance and support services described in 34 C.F.R. § 361.49(a)(4);
e. Innovation and Expansion (I&E) expenditures in support of the State Rehabilitation Council Resource Plan and the State Independent Living Council Resource Plan;
f. Professional organization membership dues for designated State unit (DSU) employees;
g. The removal of architectural barriers in State VR agency offices and State- operated rehabilitation facilities;
h. Operating and maintaining DSU facilities, equipment, and grounds, as well as the infrastructure of the one-stop system;
i. Supplies;
j. Administration of Comprehensive System of Personnel Development, including personnel administration, training, and staff development;
k. Administrative salaries, including support staff;
l. Travel expenditures;
m. Conducting reviews of determinations made by personnel of the DSU; and
n. Certain legal expenses (34 C.F.R. § 361.5(c)(2)).

In addition, include personnel costs of regional, district and field office supervisors who do not manage a participant caseload or perform the functions of a VR counselor. Furthermore, report costs of field office rent, utilities, and supply costs, etc., and any staff travel to carry out the program that is not related to the provision of VR services (34 C.F.R. § 361.5(c)(2)(xii)).

Do not report in this line expenditures under services to groups of individuals with disabilities (line 39), or expenditures for recipient personnel who manage VR caseloads or directly provide VR services to individuals with disabilities, as such costs are not administrative costs.

38. Number reserved.

39. Services to Groups:
Enter the amount of Federal and non-Federal funds, including program income, expended for each of the following services to groups of individuals with disabilities in accordance with Section 103(b) of the

Rehabilitation Act and 34 C.F.R. § 361.49.

a. Establishment, Development, or Improvement of CRPs: (See description in 34 C.F.R. § 361.49(a)(1))

   This includes Federal and non-Federal costs for the establishment, development, or improvement of a public or nonprofit CRP (34 C.F.R. § 361.5(c)(16)); the establishment of a facility for a public or nonprofit CRP (34 C.F.R. § 361.5(c)(17)); and the construction of a facility for a public or nonprofit CRP (34 C.F.R. § 361.5(c)(10)).

b. Telecommunication Systems: (See description in 34 C.F.R. § 361.49(a)(2))

c. Special Services to Provide Nonvisual Access to Information: (See description in 34 C.F.R. § 361.49(a)(3))

d. Technical Assistance to Businesses: (See description in 34 C.F.R. § 361.49(a)(4))

e. Business Enterprise Program, including the Randolph-Sheppard program: (See description in 34 C.F.R. § 361.49(a)(5))
   Report the Federal and non-Federal expenditures, as well as Randolph- Sheppard set-aside expenditures, spent on allowable activities under 34 C.F.R. § 361.49(a)(5), including management and supervision services, purchase of new or replacement equipment, and repair of equipment. Include Federal and non-Federal expenditures spent on initial stocks and supplies (up to the first six months) and initial operating expenses (up to the first six months).

f. Transition Consultation and Technical Assistance: (See description in 34 C.F.R. § 361.49(a)(6))

g. Transition Services to Youth and Students: (34 C.F.R. § 361.49(a)(7))
   Section 103(b) of the Rehabilitation Act, as amended by the Workforce Innovation and Opportunity Act (WIOA) authorizes VR services provided for the benefit of groups of individuals with disabilities, including transition services for students and youth with disabilities, who may not have applied for or been determined eligible for VR services. (Section 103(b)(7) of the Rehabilitation Act and 34 C.F.R. § 361.49(a)(7)). These specific transition services are to benefit a group of students with disabilities or youth with disabilities and are not individualized services directly related to an individualized plan for employment (IPE) goal, which are reported in Section B, line 15. Examples include group tours of universities and vocational training programs, employer or business site visits to learn about career opportunities, career fairs coordinated with workforce development and employers to facilitate mock interviews and resume

writing, and other general services applicable to groups of students and youth with disabilities when general in nature and not individualized services or directly related to an IPE.

These expenditures may not be charged to the funds reserved for the provision of pre-employment transition services.

h. Establishment, Development, or Improvement of Assistive Technology: (See description in 34 C.F.R. § 361.49(a)(8))

i. Support for Advanced Training: (See description in 34 C.F.R. § 361.49(a)(9))

40. American Job Center Infrastructure Expenditures:
Enter the total amount of Federal and Non-Federal funds disbursed for payment of American Job Center (AJC)/one-stop center infrastructure expenditures. The Federal share amount listed on line 40 is also included on line 14, which identifies the total amount of all Federal expenditures incurred under the VR program for all purposes, and line 37, Administrative Expenditures. Similarly, the non-Federal share included in line 40 is included in line 28 or 33, in accordance with those line-item instructions, which include the total amount of non-Federal expenditures incurred under the VR program for all purposes, and line 37, Administrative Expenditures.

Infrastructure expenditures for AJCs are defined as non-personnel costs that are necessary for the general operation of the one-stop center, including: rental of the facilities; utilities and maintenance; equipment (including assessment-related and assistive technology for individuals with disabilities); and technology to facilitate access to the one-stop center, including technology used for the center's planning and outreach activities (WIOA Section 121(h)(4), 34 C.F.R. § 361.700). This list is not exhaustive. For example, expenditures for the development and use of the common identifier (i.e., AJC signage) and supplies, as defined in the Uniform Guidance at 2 C.F.R. § 200.1, used to support the general operation of the one- stop center, may be considered allowable infrastructure expenditures. It is important to note that VR funds used to pay for the VR program's proportional share of the infrastructure costs of the AJCs are considered "administrative costs," as defined in 34 C.F.R. § 361.5(c)(2)(viii), for purposes of the VR program.

Non-personnel expenditures include all expenditures that are not compensation for personal services. For example, payments for technology-related services performed by vendors or contractors are non-personnel expenditures and may be identified as infrastructure expenditures if they are necessary for the general operation of the one-stop center. Such expenditures may include service contracts with vendors or contractors, equipment, and supplies. Do not include in line

40 any non-cash, third-party in-kind contributions, or additional costs including career services and shared operating costs or shared services, including personnel costs.

For additional information about infrastructure expenditures, refer to TAC 17-03: Infrastructure Funding of the One-Stop Delivery System.

41. Total Innovation and Expansion (I&E) Expenditures:
Enter the total amount of Federal and non-Federal funds expended for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities in accordance with Section 101(a)(18) of the Rehabilitation Act and 34 C.F.R § 361.35. If no funds were expended for this purpose, enter zero.

a. I&E Expenditures Supporting State Rehabilitation Council Resource Plan:
Of the total amount of I&E expenditures reported on line 41, enter the amount that was expended for I&E expenditures supporting the State Rehabilitation Council resource plan (34 C.F.R. § 361.35(a)(2)).

b. I&E Expenditures Supporting the State Independent Living Council Resource Plan:
Of the total amount of I&E expenditures reported on line 41, enter the amount that was expended for I&E expenditures supporting the State Independent Living Council resource plan (34 C.F.R. § 361.35(a)(3)).

I. Remarks

42. Remarks:
This section can be used, as needed, to clarify and explain amounts reported and changes from amounts previously reported. If line 13, Federal Cash on Hand, indicates more than three business days of cash are on hand, recipients must provide an explanation as to why the drawdown was made prematurely or other reasons for the excess cash. VR agencies may also clarify why Federal Expenditures in line 14 are more or less than drawdowns and disbursements from lines 11 and 12, respectively, as may be the result when accounting adjustments are made to expenditures affecting financial data in prior reports.

J. Certification

By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to

criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812).

43. Full Legal Name of Certifying Official:*
Enter the full name of the certifying official that is legally authorized to submit the form and attest to the certification above.

The certifying official must be an individual with the authority to attest to the certification statement.

a. Certifying Official Title:*
Enter the official title of the certifying official that is legally authorized to submit the form and attest to the certification above.

The certifying official must be an individual with the authority to attest to the certification statement.

44. Telephone (Area code, number):*
Enter the telephone number of the authorized certifying official.

a. Telephone Extension (if any):*

45. Email Address:
Enter the email address of the authorized certifying official.

46. Signature:*
By checking this box and typing the full legal name of the certifying official above, the individual submitting the report, if not the certifying official, is verifying that the certifying official has signed a physical copy of the form, and the signed form is available upon request.

47. Date Report Submitted:
a. Data entry not required.