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OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES
REHABILITATION SERVICES ADMINISTRATION

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FAQ 22-04

Frequently Asked Questions

Reporting Financial Relief and Restoration Payments on the RSA-15

Q: How should State licensing agencies (SLAs) report Financial Relief and Restoration Payments (FRRP) funds on the RSA-15?

SLAs that obligated FRRP funds prior to October 1, 2021, must include FRRP funds in the FFY 2021 RSA-15 report, Sections I and IV, to report payments to vendors and if FRRP funds were used for set-aside purposes.

The RSA-15 is a comprehensive program report for the Randolph-Sheppard Vending Facilities Program (RSVFP) that collects information about all funds supporting the program, including but not limited to the FRRP and all costs incurred under the program. To that end, SLAs must report FRRP payments made to vendors to compensate for their losses incurred during calendar year 2020 on the RSA-15 report under “Section I. Earnings and Employment,” line 8, which requests “Vending Machine and Other Income,” because the FRRP funds compensated a business loss in the RSVFP.

Congress also authorized SLAs to set aside FRRP funds to the extent not needed to compensate vendor losses, allowing the funds to be used for any purpose consistent with the RSVFP set-aside funds under 34 C.F.R. § 395.9(b). For those SLAs that administer set-aside accounts, once FRRP funds are deposited into the set-aside account, they take on the character and purpose of those funds and must be reported on the RSA-15 along with other set-aside funds under the RSVFP. For example, if vendors received Fair Minimum Return (FMR) payments from the set-aside account, the FMR income in Section I, line 13, must be reported as the total amount of FMR received, meaning any FRRP funds designated for FMR plus other funds from the set-aside account. The same analysis applies to any of the other allowable purposes for set-aside under 34 C.F.R. § 395.9(b), such as retirement and other benefits in Section I, line 9.

Similarly, in “Section IV. Program Expenditures By Source of Funds,”¹ SLAs must report all expenditures incurred under the RSVFP on the RSA-15. Those expenditures include ones SLAs made from any set-aside account, which would also include FRRP funds deposited there. For example, when reporting FMR expenditures on Section IV, line 5, SLAs must report the total amount of set-aside funds paid for FMR, meaning any FRRP funds designated for FMR plus other funds from the set-aside account. SLAs also must report FRRP funds spent along with other set-aside funds for all other applicable categories listed in Section IV, such as lines 1, 2, 4, 6, 7, and 8. In other words, SLAs do not report FRRP expenditures separately from the set-aside expenditures. Rather, SLAs must include the FRRP expenditures in the total amount of set-aside expenditures reported for each of these purposes.

¹ We recognize the RSA-15 instructions for “set aside” in Section IV do not specifically include FRRP funds; however, the RSA-15 was developed and issued prior to Congress appropriating FRRP funds for and authorizing them to be used for set-aside purposes.

In RSA-FAQ-21-04, RSA indicated each SLA would need to submit an SF-425 at the end of Federal fiscal year (FFY) 2021 and again at the end of FFY 2022 if the agency was still distributing FRRP funds in FFY 2022. The purpose of the SF-425 is for each SLA to report the total amount of FRRP funds the agency received and the total amount of FRRP funds distributed by the agency in FFY 2021 and, as applicable, in FFY 2022. However, the purpose of the RSA-15 is to provide a comprehensive report on the RSVFP. Because each report serves a separate and distinct purpose, the funds must be accounted for in both places. Therefore, an SLA must include FRRP funds in the RSA-15 for each year the SLA obligates FRRP funds, consistent with the SLA's submission of its SF-425 for that year.