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The Virginia Board for People with Disabilities is Virginia's Developmental Disabilities Council. We encourage ACL to direct its evaluation team to work with Councils to identify the type of information that aligns most closely with the DD Act's identified charge for DD Councils. DD Councils do important work and influence systems of services and supports for people with DD in ways that are often not quantifiable. Advocacy, capacity building, and systems change activities are often layered with complexities unique to each state. Additionally, we have identified the following:

1. The performance measures do not accurately and consistently capture performance across all Councils. For example, they are too narrow, focusing mostly on outputs rather than outcomes despite that ACL's emphasis on the latter. Furthermore, many of the measures are vague, likely leading to different interpretations within and across DD Councils. A review of the performance measures and additional guidance are warranted.
2. There is a lot of duplication within the PPR, resulting in an unnecessary high reporting burden. For example,
 - o the expected outputs and expected outcomes are often duplicative of the performance measures and information reported in the Progress Report Narrative. Removing the expected outputs and expected outcomes sections, or the performance measures, would reduce the reporting burden without reducing the level of information provided.
 - o Several of the narratives repeat the same information, just in varying levels of detail. Information on evaluation and lessons learned is expected in both the Evaluation of State Plan Implementation narrative and in the Progress Report Narratives for each objective. Information on Council activities and their outcomes is expected in both the Progress Report Narratives for each objective and in the Overall Narrative for each Goal. The new 4-year and 5-year Overview sections feel similarly duplicative.