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Thank you for the opportunity to provide comments on behalf of the Idaho Council on Developmental Disabilities regarding the Annual Program Performance Report (PPR). While we understand the need to collect comprehensive information in a uniform way from all DD Councils, we would like to see changes that would make the PPR less burdensome, easier to understand, and less redundant.

The burden hours cited in the Federal Register for completing the PPR are not an accurate representation of Idaho's burden hours. We estimate that the Idaho Council staff spend at least twice as much time compiling the information for the PPR annually.

Additionally, the language in the PPR is often complex, specifically the wording of some of the performance measures. For example, Systems Change Measure 2.2 reads: "The number of Council efforts that were implemented to transform fragmented approaches into a coordinated and effective system that assures individuals with developmental disabilities and their families participate in the design of and have access to needed community services, individualized supports, and other forms of assistance that promote self-determination, independence, productivity, and integration and inclusion in all facets of community life." Revising the language of the performance measures would make the PPR much easier to understand for Council staff, Members, and citizens; this would make the PPR a much more meaningful document.

Finally, there is redundancy in many sections of the PPR. For example, in Section IV, State Plan Implementation Progress Report, Councils are required to include a "narrative progress report" for each objective, describing "the activities that were implemented toward achieving the objective" and "evaluation activities to monitor progress". In a different part of this section, Councils are asked to describe "progress towards achieving outcomes for overall objectives", and in section III, State Plan Implementation, Councils also have to describe "the evaluation activities undertaken during the fiscal year being reported" and "the broad results of the evaluation activities described". This redundancy and repetition add to the burden hours of completing the PPR.

Moving forward, we would like to see a more concise, plain language version of the PPR in which we can clearly report on the impact the Council is making in our state. This new version of the PPR should be developed in collaboration with DD Council Members and staff from states of varying sizes across the country.

Thank you,  
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