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RE: Agency Information Collection Activities; Submission for OMB Review; Public Comment Request; State Developmental Disabilities Council-Annual Program Performance Report (PPR) (OMB Control Number 0985-0033)

Please accept the comments below on behalf of the New Jersey Council on Developmental Disabilities concerning the Annual Program Performance Report (PPR). Completing a PPR is critical to the work being performed by Councils. A PPR should measure Council success in meeting its Annual Work Plans as derived from its 5-year State Plan. A PPR must also document opportunities that present obstacles in meeting the Annual Work Plan's targeted objectives. It is clear that the PPR is used as the method to track and monitor progress and ensuring compliance with the Developmental Disabilities Assistance and Bill of Rights Act.

In response to the burden hours cited in the Federal Register for completing the PPR, New Jersey finds the burden hours are at least four times more than what is estimated in the Federal Register. New Jersey includes all project staff, fiscal staff and administrative staff's time in calculating that at least 700 hours are necessary each year to submit the PPR. This year will calculate higher since there is a two-step process and a new reporting tool that requires training and before entry into the new platform.

In addition to the burden hours, the reporting format lacks clarity and a streamlined process for determining outcome measures. The reporting format is rigid and does not allow the user to capture all aspects of Council performance. The PPR should provide a mechanism for Council's to showcase the great work completed over a twelve-month period. The report should be useful beyond its submission to ACL. The report should allow Council's to document and demonstrate its impact on individuals with Intellectual and Developmental Disabilities (I/DD) being supported by the Council, their families, and the system partners sharing in life changing accomplishments.

A combination of data collection and impact benefits should be considered as an approach for PPR reporting. Councils should have a reporting platform that captures critical data points but informs the reader (funders, administrators and the public). Councils should have a reporting platform that allows for the exchange of ideas and ultimately creates an historical timeline of the great work generated, reports and research performed, as well as policies, practices and lives impacted. As a result of the PPR not being an interactive and robust platform, the burden hours intensify because reporting staff must duplicate their efforts in reporting within the PPR platform and reporting within other systems to appropriately capture the outcomes within their project area. If the PPR were a more interactive and robust platform, the burden hours would decrease.

Thank you for the opportunity to comment. The New Jersey Council on Developmental Disabilities is ready to work with ACL, NACDD/ITACC and other Councils in developing a reporting tool that will provide the greatest benefits to all.

Respectfully,

Mercedes Witowsky
Executive Director