

August 11, 2021

RE: Developmental Disabilities Council Program Performance Report (OMB Control Number: 0985-0033, ICR Reference Number: 202107-0985-001)

Dear Sara:

Please accept the comments below on behalf of the Nebraska Council on Developmental Disabilities concerning the Annual Program Performance Report (PPR). We appreciate the opportunity to share Nebraska Council staff concerns of the reporting burden and the redundancy in reporting quantitative measures and narrative throughout the current PPR template. Nebraska recognizes and understands that AoD is focused on capturing better outcomes, and we applaud AoD for holding State DD Councils to a high standard. However, we don't think the current PPR format meets this objective.

In response to the burden hours cited in the Federal Register for completing the PPR, we think it is imperative to share that Nebraska's combined burden hours for two staff members exceeded 450 hours for the FFY2019 PPR, well over the 172 hours ACL estimate. The amount of time that is needed to complete the report greatly impacts the other Council work that must be accomplished. Breaking out the narratives to report different information in different sections takes additional time and effort. Gathering and entering the data into the PPR templates has been a lesson in patience, and we are unsure how the data and narratives we share with ACL are used.

It is disheartening that in recent years we have learned that AoD/ACL does not understand or recognize the impact of Councils' work. Each year, Council staff spend innumerable hours writing the required annual reports, often times in excess of 100 pages, detailing the progress and good work being done in their state or territory. Still, Nebraska struggles with sharing the full PPR product with others, as our Council members, stakeholders, and members of the public find the document very difficult to understand. The PPR end product fails to provide easy-to-understand information that demonstrates the impact of State DD Councils across the country.

Nebraska staff are concerned with the return on our investment in time-spent writing the PPR, and we wonder if the final product is truly useful to ACL. As a minimum allotment state with a very small staff, we simply struggle with the resource of time to complete the PPR efficiently. Despite planning ahead, we sacrifice many hours we might have spent with family during the holidays, and we still ended up worried that the PPR is not our best work.

Nebraska joins other DD Councils in recommending that ACL reduce the reporting burden to the minimum necessary to meet reporting requirements. Nebraska staff like the recommendation from California Executive Director Aaron Carruthers that ACL allow Councils to focus on Council highlights and success stories from a shorter PPR template and incorporate this information into a public-facing, plain language annual report that is also supplied to ACL for PPR purposes.

The work performed by Councils is human driven. Perhaps the issue is that this does not fit well with government work where data and numbers are the measure of success. But data and

numbers alone do not capture the real life, real world impacts on the many people affected by the work of the 56 DD Councils across the United States and its Territories.

Relaying stories resulting in the work is one avenue. Stories should be told of the work that went into changing legislation or how self-advocates successfully rallied for their civil rights. Nebraska Council staff are encouraged that ACL plans to create a National Story Database where Councils can share the stories of impact and how we are transforming lives. Additionally, Nebraska staff support Tennessee DD Council Director Wanda Willis in her recommendation to consider a PPR format that collects compliance requirements cited in the DD Act using a checklist format, along with a separate component of the PPR that would focus on impact. Results tied directly to the DD Act will provide important information for the Secretary, Congress, state government, and private citizens.

Nebraska staff hope that ACL will consider working with Councils and NACDD/iTACC to create a PPR report template that will minimize staff reporting burden time while creating a product that validates how Council work meets the intent of the DD Act.

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