

Public Comments in response to 30-day FRN for ICR Ref No.: 202107-0985-001 0985-0033

- The burden hours calculation is based on the amount of time it takes to complete data entry on the Program Performance Report template itself. Commenters interpreted this calculation to include the preparation time of several staff prior to inputting the information into the template, which is not part of this total.
- Councils are required to submit a cohesive narrative explanation to justify their data, performance measures results, and progress in the PPR. Councils should be writing their narratives in a way that tells the story of the numbers, summarizes its progress, and can be easily understood by its readers. This responsibility is with the author of the report. ACL has been working with the Councils for several years and contracted a communications consultant and a training and technical assistance contractor, who has shared (and will continue to provide resources) on how to write effective reports. Ultimately the primary purpose of the PPR is to inform the federal government on the progress made based on the State plan submitted.
- ACL continues to work with Councils to not only meet the federal data reporting requirement needs, be informed of program progress, but to also understand Council's use of the PPR as they share annual reports with citizens and stakeholders in their state/territory. Past workgroups comprised of DD Council staff developed the existing PPR tool after much consensus building conversations and a thorough vetting process. ACL will continue to have conversations on areas for potential streamlining as part of our continuous quality improvement efforts.

From: Davidson, Vicky <vdavidson@moddcouncil.org>

Sent: Monday, August 16, 2021 6:06 PM

To: Newell-Perez, Sara (ACL) <Sara.Newell-Perez@acl.hhs.gov>

Subject: 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 Missouri Developmental Disabilities Council (MODDC), concerning the Annual Program Performance Report (PPR) currently listed for public comment in the federal register.

When looking at the information for the average burden hours that are cited in the Federal Register for completing the PPR, we find that Missouri is experiencing a much greater average of burden hours than what is reported. Our burden hours are closer to 650 - 700 hours annually when we look at the time each of our executive, program and fiscal staff who work to provide information for the PPRs each year.

While we spend hundreds of burden hours on each PPR, the reports themselves, do not useful information in a plain language format that can be easily understood by Council members, citizens or even the federal government. Nor does this information demonstrate the real impact of DD Councils across the country.

We do find, that a number of the performance measures used, are redundant and confusing. We have learned that real systems change takes years to occur as we apply a number of strategies and activities while working with stakeholders in the state. The current performance measures, do not adequately reflect the impact we are realizing in MO. Without the context of the narratives, the performance measures don't tell the story of systems change, and that change is not measured with the current performance measures. It is also difficult to easily pull information from the current PPR format to include in more meaningful reports to convey the impact of our work.

It would be helpful to have a more simple template/reporting platform to report data that aligns more closely with our charge laid out in the DD Bill of Rights Act. We could use such a template to create more meaningful annual reports, rather than duplicating work by creating a PPR and then a more accessible, separate annual report that is in plain language and accessible to families and individuals with disabilities. Pulling meaningful information from the current PPR is very difficult and adds to the reporting burden of councils.

We do recognize the work of ACL, NACDD/ITACC and state council staff over the years as they worked to attempt to improve the PPR. We would be happy to work on any initiatives that are established to improve the PPR reporting system that will benefit us all while at the same time, honoring the intent of the DD Act.

Thank you so much for this opportunity to provide public input on the DD Council PPR process.

Respectfully,

Vicky Davidson

Vicky Davidson, M.Ed.

Executive Director

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From: Shannon Buller <shannon.buller@wyo.gov>

Sent: Monday, August 16, 2021 5:41 PM

To: Newell-Perez, Sara (ACL) <Sara.Newell-Perez@acl.hhs.gov>

Subject: Public Comment on the PPR

Dear Sara -

Please accept the comments below on behalf of the Wyoming Governor's Council on Developmental Disabilities (WGCDD) in reference to our Annual Program Performance Report (PPR).

The Council understands the need for gathering and reporting needed data to demonstrate/support the work being done to make systemic and capacity building changes. We are happy to do this as sharing this information not only helps our state, but can benefit others.

Our main concern is the annual report does not need to be as repetitive as it is in its current form to give that needed information. The WGCDD has three (3) members on staff. The amount of burden hours to complete the annual PPR are high and cumbersome - the repetition makes it more so.

Some examples of repetition on the narrative requested on the report – from the last PPR template:

- Provide an overall cohesive description of (a) the extent to which progress is being made in achieving the intended outcomes of the Goal for the reporting year, (b) the extent to which each goal was or was not achieved for the reporting year, (c) where applicable, factors that impeded goal achievement for the reporting year, (c) needs that require substantive state plan amendment (goal only)
- 4 Year Overview : A description of how the Council will use and build from knowledge gained and progress made to move forward in the next state plan cycle. (This section only applies to the PPR submitted for the Federal Fiscal Year 2020, which will be due by January 1, 2021)
- 5 Year Overview : For the final PPR of this state plan cycle, provide an overall analysis of the outcomes achieved during the five year state plan cycle. The description should include the extent to which diverse stakeholders are satisfied with council activities that promote self-determination and community participation for individuals with disabilities and families, results of other types of information gathering such as focus groups, surveys, or other feedback or input methods with individuals with developmental disabilities and families and major accomplishments and factors impeding goal achievement (if applicable). (This section only applies to the PPR submitted for the Federal Fiscal Year 2021, which will be due by January 1, 2022)
- Provide an overall description of this effort
- 10. The report should include the following: (a) A narrative progress report that cohesively describes the activities that were implemented toward achieving the objective, including how the identified strategy was used, how the activity was implemented, challenges to achieving the objective and unexpected benefits. (b) For system change activities, include a description of the stage of implementation (planning, initiation, implementation, outcome/fully integrated) of the system change initiative. (c) All narratives must describe what numbers make up the performance measures number for the activities being reported in the narrative. (d) A summary of evaluation activities to monitor progress and impact of council supported activities for the objective; data collected during the year, data sources, and data collection methods; (logic model and evaluation plan may be attached to the report). (all of this is gathered in other areas too.)
- 13. Progress towards achieving outcomes for overall objective: The annual report should include an assessment as to the extent to which progress was made on the intended outcomes for the objective

On the other side, there are times where what can be reported is limited.

- It is challenging to show the cumulative path to systems change. Often a great deal of work has been done that is not reflected in the PPR. Would it be possible to have a way to indicate this progression through benchmarks, such as “being considered by the state,” “introduced as a bill,” “public hearings held,” “budget proposal,” “wavier changes considered,” etc.? The ability to list efforts and then check off their stage of development would be quicker for Councils to quantify.
- In the “Outcomes achieved” section in the objectives section, Councils can only indicate Yes or No. This is not reflective of the way this work gets done. Could a “partial” option be added that councils can select and then expand on in the narrative section?
- If ACL wants to know which councils or how many councils are working on a specific area (such as youth leadership or supported decision-making), can checkboxes for these topics be added for councils to indicate this? The checkboxes for the performance measures are too broad to capture work on specific projects or topics.

Other observations:

- What section does ACL refer to most often and what information is most useful? If we know this, we can focus our comments on how to share this information with them.
- If ACL’s needs to shift because of a current administration or attention to a new focus area (e.g. COVID/public health), please put those areas of interest in the PPR: not as a required section but as an optional section where Councils can share knowledge/information about the topic of interest. This is crucial too as each state has demographic /population variations that do not always fit into a predetermined concept as perceived by the entity requesting the information.

We would 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 in order to elevate that type of information and data at the top of each PPR report, as well as throughout the document.

Thank you for this opportunity to provide public input on the DD Council PPR process.

Best regards,

Shannon

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Do what you feel in your heart to be right, for you will be criticized anyway.

You'll be damned if you do...damned if you don't...

Eleanor Roosevelt

Hi Jennifer and Sara, hope you are all doing well. Writing to get your view on the best way to engage re overall burdens of the PPR. I saw this federal register notice [Federal Register :: Agency Information Collection Activities: Submission for OMB Review: Public Comment Request: State Developmental Disabilities Council-Annual Program Performance Report \(PPR\) \(OMB Control Number 0985-0033\)](#), which asks for comments on the PPR burden. The overall PPR burden is high. I also see the notice maybe narrowly focused on burden hours, instead of on ways to minimize PPR burdens. I shared the notice with fellow EDs and received a good number of responses that Councils widely agree with views expressed by ACL's during the JR Communications process. The PPR needs "A mutual expectation of what it is and what it's not. It's not a place to tell the narrative. Let's stop forcing it." (attached, slide 10). Also expressed during that process is that the PPR is supposed to be the smallest amount of burden to make sure we are in compliance. This public comment notice looks like an opportunity to share the burdens of the PPR. Or is it? What is the most productive way for Councils to give feedback on how the PPR can accomplish the goal of being the being the smallest amount of burden to make sure we are in compliance?

Best,

Aaron

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ps. the JR Communications product, advice, branding, and ways to message between Councils and ACL continues to be GOLD. It also takes time. It takes practice. I just did another training with my staff and each time they get more out of it. Honestly, each time I train on it, I get more out of it. Thank you again for this investment.

Aaron Carruthers | Executive Director
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