

Good morning, Ophelia. It was great seeing you in D.C. recently for the NDRN CEO Meeting! Below are the comments submitted on behalf of Disability Rights Michigan (DRM) regarding the OnePPR.

Disability Rights Michigan (DRM) is the private, nonprofit, nonpartisan protection and advocacy agency mandated to serve Michigan's disability community. DRM is pleased to comment on the OnePPR. The staff submitting these comments have many combined years of experience in completing PPRs, and many have been involved in preparing the OnePPR annually from its inception.

The amount of time for this report is cumbersome, unnecessarily duplicative, and feels unconnected to the overall "why." Our team of four experienced staff spent 203 hours over 3 months to complete the report. It's astounding to think how much time and resources goes in to completing all PPRs which takes us one entire quarter of a fiscal year. The time and resources required to complete just this one report would be better spent serving clients.

The data reporting is duplicative and confusing. We report on number of people served, number of cases closed, number of cases open, number of people impacted, and other categories in six different sections of the report (1a-l, 1j-p, 2a, 3a, 3b, 3c-j), essentially reporting the same data in different configurations multiple times for no apparent reason. Each different method of "slicing" the data loaf must match the other, adding to the complexity of completing the report. Many sections are not really combined but are merely four separate reports on one form.

The data recording requirements also interact with our timekeeping and accounting systems, creating additional reporting complexity for grant projects where programmatic and administrative work must be parsed out manually to provide accurate project counts and impacts.

The report and time commitment could be shortened by keeping one of Section 1, 2, or 3. Alternatively, our Protection and Advocacy of Individual Rights (PAIR) federal report asks for one set of individual data and one set of systemic data.

There are positives to the report as well, including the generous narrative allowance, the rationale for estimating group impact, and the combined sections of the report (on publications and media).

Gender reporting is currently limited to male and female. This report choice should be expanded to create a truer description of the gender identities of the people we serve.

Thank you in advance for considering and applying these comments. DRM values ACL's excellent support and openness to feedback. We look forward to continued collaboration to help Protection and Advocacy agencies devote more of their scarce resources to direct client service.

Please contact me if you have any questions.

Thank you,  
Michelle

**Michelle Roberts**

Executive Director

She/Her/Hers

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