

GRETCHEN WHITMER
GOVERNOR



STATE OF MICHIGAN
MICHIGAN
DEVELOPMENTAL DISABILITIES COUNCIL
LANSING

JEREMY J. MURPHY
CHAIRPERSON
VENDELLA M. COLLINS
EXECUTIVE DIRECTOR

January 24, 2023

Administration for Community Living,
330 C Street SW, Washington, DC 20201
Attention: Sara Newell-Perez.

Re: OMB Control No. 0985-0029

Dear Ms. Newell-Perez:

Michigan Developmental disabilities Council greatly appreciates the opportunity to provide comments regarding the burden of estimates for the development of the Council's five-year plan.

The following is respectfully submitted in the hopes that the time requirements of developing a DD Council's five-year will be reflected in future guidance.

(1) whether the proposed collection of information is necessary for the proper performance of ACL's functions, including whether the information will have practical utility;

Response:

Addressing the practical utility of the data being sought, MiDDC argues that data collection is only utilitarian as to the extent the data is applied to correct or rectify an identified shortcoming. MiDDC far exceeds the burden hours identified in this Notice for Information (NFI).

(2) the accuracy of ACL's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used to determine burden estimates.

Response:

Typically, in the development of the five-year plan, MiDDC staff would hold ten "listening" sessions to identify important issues affecting people with intellectual/developmental disabilities (I/DD). However, due to the COVID-19 pandemic, two of the ten sessions had to be cancelled. The listening sessions were attended by a minimum of 20 individuals, to a maximum of 50. Using the average number of 35, times by 6 hours per session, times 8 sessions, equals 1680 hours. (35 X 6, X 80 1680 hours)

Time for the three staff members used to dissect and analyze the information collected from the listening sessions exceeds 120 hours. (3 staff X 40 Hours)

The physical drafting of the document encompasses three staff people, countless hours of drafting, revisions, redrafting, etc. There is no conceivable way to accurately calculate the number of hours incorporated into this process.

Council approval is a process that incorporates 21 members of the council to go through each section of the plan, and either accept as presented or suggest revisions. This process is done during the council's quarterly meeting and takes approximately 4 hours (should no revisions be suggested). This part accounts for a minimum of 84 hours (21 X 4).

At the minimum, MiDDC can account for over 1,884 hours to produce a comprehensive 5-year plan.

(3) ways to enhance the quality, utility, and clarity of the information to be collected

Response:

ACL should give clear instructions on how the information collected relates to the plan. We collect much more information than we need to develop the plan. If the optional sections aren't needed, they should be deleted from the plan template. States feel obligated to provide the information because it's there. Also, the national data sets usually come to states after we've started our public input. That data isn't typically a driving force of plan/goal development.

(4) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques when appropriate, and other forms of information technology

Response:

For the past two plans, we've used an online tool (that mirrored our in-person method) to gather feedback from those who were unable to attend in-person input sessions. Those tools have had minimal participation. Moreover, less than 1% of participants are people with developmental disabilities. Using information technology as the primary collection technique would reduce the participation of our intended audience. Our state would need to achieve widespread digital equity to support this change.

Sincerely,

Vendella M. Collins

Michigan Developmental Disabilities Council – Executive Director