

## Response from Illinois, ICDD to:

### Agency Information Collection Activities: Proposed Collection; Public Comment Request of the State Councils on Developmental Disabilities (Councils) State Plan

A Notice by the [Community Living Administration](#) on [11/30/2022](#)

#### Requested:

With respect to the following collection of information, ACL invites comments on our burden estimates or any other aspect of this collection of information, including:

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

#### ICDD response:

(1) and (2)

A burden estimate is a pertinent measure to gather related to State Plan Development. It doesn't capture relevance or utility of a State Plan, but it is important to know the impact of requirements to understand the demand placed on DD Council staff and members in terms of their time and associated wage cost.

ICDD calculated an informed estimate of the time invested in developing the 2022-2027 State Plan. The estimate was made by an audit of Outlook and email to capture the work in progress: meetings and calls, CRA research and writing, public outreach, Council meetings and education including time to analyze information and prepare presentations, meeting for writing (ex. Logic model, workplans), Verity entry, review of ACL feedback, etc. Our burden estimate is:

Staff hours                      550

Council member hours   377

Total Burden hours        927

This is considerably higher than the average of 367 hours given in the Federal Register notice. By comparison, ICDD's 2017 State Plan Burden estimate was 854 hours. That the current estimate is higher fits with the details of our process. ICDD hosted 10 public input sessions virtually this time, surveyed Council members, and posted a public survey to gather input. This effort to gather input was much more intensive than what was done in 2017. We also had added time invested in reading and responding to feedback to our plan. That also required more analysis and staff time over the 2017 planning process.

(3) and (4)

To capture an accurate accounting of every hour that went into State Planning would be a huge effort and there doesn't seem to be an automated means that would simply capture that.

The information learned through the State Planning process is valuable to be sure. Given that our Council is involved in many statewide efforts, we are aware of needs and issues that are priorities. The required information and data in the CRA translates to a lot of staff time hunting down very specific data and

numbers. Given that national data sets are usually at least 2-3 years behind in reporting data, the effort in tracking it down doesn't always seem to yield the most relevant information for knowing current status. The required data could be reduced. Councils need to be more nimble in seeing trends in real time.

#### Requested:

This is a revision of a currently approved information collect that expires March 30, 2023. To ensure the DD Council State plan is consistent with the [Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#) and the [Executive Order on Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals](#), ACL intends to determine whether sexual orientation and gender identity (SOGI) data elements need to be adapted prior to adding them to ensure accessibility of the questions for individuals with intellectual and developmental disabilities.

#### ICDD response:

This only tangentially touches on State Plans, but is more relevant to the Program Performance Reporting (PPR). ICDD uses a survey it developed in most cases to capture the demographic data required in the PPR. Illinois' self-advocacy network assisted us in making the survey easy to read. We made some adaptations to terms to make them more accessible to individuals with IDD to improve their ability to accurately respond to the items. For example, the categories ICDD's typical survey includes are: male, female, prefer not to choose. The decision was made that including LGBTQ language as choices would be confusing to some people with IDD who may have low reading comprehension. It was felt that simply giving the option of "I don't want to pick male or female" was sufficient to get relevant information on a person's self-report of gender. For this specific purpose we have not identified a need as of yet for more detail about a person's gender identity or sexual orientation.