

Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

Five public comments received from UCEDDs Directors and/or Associate Directors.

Comment #1

- a) Based upon experiences where the estimated number of hours was very substantially less than the number of UCEDD hours invested in reporting, the estimated number of hours to adapt to and maintain the revised system seems quite low. For example, grantees' internal data collection methods will require substantial revision. All faculty, staff and trainees will need training in their new documentation responsibilities. Each year, training will be repeated for new faculty, staff, and trainees.
- b) The information published in the Federal Register estimates that data collection will take 143 hours. This has not been the IOD's experience. The IOD estimates that over 1,000 hours are spent annually entering data and creating IOD reports for ACL and AIDD. Although the work required is significant, we appreciate. Despite these recent improvements, an assessment of the proposed changes to the reporting requirements of the PPR predicts a net increase in effort in order to be in compliance.
- c) Our current estimated time burden for data collection, entry, cleaning and analysis as well as report writing annually is ~1,200 hours for the PPR. This does not include writing the 5-year report. We estimate that it would take us an additional 40-60 hours to write the 5-year report, increasing the total estimated time burden for 5-year reporting years to almost ~1,300 hours.
- d) Furthermore, reporting of the intermediate outcomes for Research, in particular, will be onerous for researchers who already have substantial reporting and publication requirements specified in their grants and contracts. This requirement seems redundant with the required reporting of publications.

Response #1

ACL has reviewed and accepts your recommendations.

- The estimated burden hours will be corrected in the 30 – day FRN public call for comments.
- In response to the concern about reporting intermediate Research outcomes, the 5-year report language will be amended to require a Research impact statement replacing the case example requirement. ACL will use the impact statement for communication, collaboration, and other purposes.

Comment #2

The following paragraph from Part 1.a. Detailed Work Plan Progress Report (annual report) seems to refer to future activities (e.g., “individuals who will work”) and therefore is very confusing as an aspect of a report on progress in a past year.

Response #2

- ACL reviewed and will delete the confusing paragraph in Part 1.a from the final five-year report template of the Work Plan Progress Report.

Comment #3

- a) AUCD would need to overhaul NIRS to ask all required questions and to provide single-year and cumulative reports summarizing the data. They would need a way to track issues encountered by grantees as they try to input the data into NIRS, and develop FAQs to respond to the issues.
- b) Additionally, as we begin to think about the IOD’s 5-year report, significant cost and time savings could be realized if an intuitive and efficient structure for the 5-year report could be built into NIRS.
- c) Recommend building the 5-year report into the NIRS system to ease reporting burden of our and other UCEDDs’ having to create our own templates for reporting.
- d) Currently, evaluation and demographic information of participants in all core functions must be manually entered into NIRS after completion. This is time consuming and leaves room for missing data and error data. Building electronic forms that would allow UCEDDs to collect their evaluation data directly in NIRS would be very helpful in reducing data error and time spend on data entry. Recommend development of customizable e-forms within NIRS by AUCD to support UCEDDs in collecting their evaluation within NIRS.

Response #3

- The UCEDD Resource Center at AUCD will meet this need.

Comment #4

Overall, the proposed questions (especially those to be answered in narrative form) do help to highlight significant outcomes, and the extent to which each UCEDD has successfully performed its core functions, independent of project-specific outcomes.

We do have some concerns regarding (1.b.1). *Discuss CAC involvement in evaluating UCEDD activities, and in the development and review of the final program progress report.*

At every CAC meeting, we provide updates on the UCEDDs activities, where CAC members are encouraged to comment and make suggestions. An in-depth annual report is

provided at our full-day in person CAC meeting every November. If that coincides with a 5 year renewal application earlier that year, then a 5 year cumulative report is shared.

Previously, there has been no requirement for CAC members to be directly involved in the development of this report. Essentially, this is a technical report, aggregating 5 years' worth of NIRS data with additional narrative and impact statements. As such, we feel it is both burdensome and somewhat irrelevant to involve the CAC in the development of a report that is submitted to AoD. Rather than ask about CAC involvement in the development, perhaps it would be more beneficial and direct to require that CAC members be surveyed about their experiences and satisfaction with the structure and function of their respective CACs over the preceding 5 years.

Response #4

- Regarding section (1.b1): ACL reviewed and accepts your recommendation to delete the requirement for CAC involvement in the development of the final five-year report.

Comment # 5

Recommend ensuring enough time is allocated between the year 5 annual report due date and the due date of the overall 5-year report.

Response #5

- The year 5 annual report is due July 30 and the 5-year closeout report is due 90 days after the end of the grant period or September 30 for time allocation.