



To: Julie Wise
Office of Information and Regulatory Affairs

Through: Tomakie Washington
ACL PRA Portfolio Manager

From: Corinna H. Stiles, PhD, JD
Director, Office of Independent Living Programs

Re: Non-Substantive Modifications to the Centers for Independent Living (CIL)
Program Performance Report (PPR) 0985-0061

Date: May 11, 2020

The Office of Independent Living Programs (OILP) must update the currently approved Centers for Independent Living (CIL) Program Performance Report (PPR) 0985-0061 to highlight any CARES Act reporting requirements. OILP is finalizing an updated Excel spreadsheet and guidance document for the CIL, ACL would like to request a non-substantive change to the currently approved CIL.

Quick background on the currently approved CIL PPR 0985-0061. The CIL PPRs are used by ACL to assess grantees' compliance with Title VII, and applicable provisions of the HHS Regulations at 45 CFR part 75. The Rehabilitation Act requires three IL program reports: (1) State Plan for Independent Living, (2) ILS Program Performance Report, and (3) Centers for Independent Living PPR. Based on ACL's assessments of PPRs, it provides technical assistance when necessary, further assesses compliance when appropriate, grants and denies continuations as appropriate, and terminates grants when necessary. The PPR is also used by ACL to design CIL and SILC training and technical assistance programs authorized by section 721 of the Act. CIL PPRs, because they are all in the same easy-to-understand and easy-to-compare format, conspicuously display trends and patterns that inform ACL's training and technical assistance programs.

ACL needs to update the CIL to include guidance and an updated instrument, which highlights data elements required by different CIL grantees to report CARES Act related data. Some of this data is already collected (see attached) as part of the regular reporting requirements; ACL would like OMB approval to submit these updates and guidance document as a supplemental mini PPR that pulls out the CARES Act specific work and is included with 0985-0061. Without clearly identifying CIL CARES Act activities from Part C funded activities, ACL will not know what services were provided with the funding.

The data fields were selected from the current CIL PPR under OMB 0985-0061; no data is new data the instrument will be a separate instrument highlighting requirements to report CARES Act funding services and activities.

OILP has concerns that if these activities are lumped into the regular Part C PPR the info will be lost or increase the possibility for fraud and/or abuse of funds. By highlighting the CARES Act data elements as a supplemental instrument and providing a guidance document in the currently approved CIL IC, ACL can more quickly identify CIL CARES Act activities from Part C funded activities. The CARES Act reporting is due 90 days after September 30, ACL would collect data between September 30 and December 31 2020.

Any possible burden increase or decrease is very minimal as there are CARES Act reporting data element fields that different CILs will take different lengths of time to complete in this supplemental report (CILs will likely have varying amounts for various CARES Act funding). Additional time throughout the year is minimal given all the information is already collected.

For these reasons, ACL thinks these updates fit the terms of clearance for a non-substantive/no material change request under the PRA.