

Section	Proposed Change
SFA: Financial Loan	Clarify partnership loan with no guarantee or buy-down need to document program subsidy/investment. (No new data)
Reuse: Exchange	Eliminate automatic exclusion of exchange recipients from performance measure; consistent exclusion used for all reuse recipients. (No new data.)
Device Loan	Separate type of borrower and type of AT device tables by purpose of loan (decision making- access or other-acquisition. (No new data.)
Device Demo	Separate decision-making participant from other participants in reporting table. (No new data.)
National Outcome Measures	Aligned with outcome and output measures used by ACL for program evaluation and budget justification

Public Awareness and I&A	<p>New question added for description of partnerships as part of PA description</p> <p>New data table added to report how individuals learned about the AT Program</p> <p>New information request in Notes for description of partnerships that increase referrals</p>
State Improve Outcomes	<p>New section added to collect data on coordination/collaboration. Two new narratives with drop-down tags. Optional for grantees.</p>
Leveraged Funding	<p>Eliminated Section B and folded data into Section A Table to simplify and clarify.</p>
Instruction Manual	<p>Deleted redunant text (duplicate in data collection instrument) and updated AT Taxonomy for currency.</p>

last update
1/12/2021

Public Comment(s)

Willie Gunther, Director, Illinois AT Program: IATP has no concern with any of the proposed changes that either provides clarification of data or a reporting rule change.
Jill Sherman, Director, Arizona AT Program: AZ: AzTAP does not have concerns with any of the proposed changes that either provides clarification of reconfigurations of existing data or a reporting rule change.
Audrey Busch, Executive Director, Association of AT Act Program: ATAP members request clarification on subsidy reference categories and types that can be reported.

IL: IATP has no concern with any of the proposed changes that either provides clarification descriptions, reconfiguration of existing data or a reporting rule change.
AZ: AzTAP does not have concerns with any of the proposed changes that either provides clarifications of descriptions, reconfigurations of existing data or a reporting rule change.
ATAP: While ATAP members agree it is difficult to collect information from the buyer without an intermediary role, the issue is burdensome to State AT Programs. Should this new language be adopted, State AT Programs would be taking on a matching role then forces the State AT program to accept more responsibility that the product is in good working order and meeting the requirements related to liability and insurance. This language should be deleted, or, there should be extensive guidance for how this is to be implemented.

IL: IATP has no concern with any of the proposed changes that either provides clarification descriptions, reconfiguration of existing data or a reporting rule change.
AZ: AzTAP does not have concerns with any of the proposed changes that either provides clarifications of descriptions, reconfigurations of existing data or a reporting rule change.
Laura Plummer, Director, Wisconsin AT Program: WisTech is in support of the device loan reporting changes. However, we are concerned to update data collection systems for accurate reporting. Therefore, State Assistive Technology Act Programs will need sufficient time for the revised APR being approved to the required implementation/data collection date.

WI: WisTech is in support of the device demonstration reporting changes. However, we are concerned about the timeframe for accurate reporting. Therefore, State Assistive Technology Act Programs will need sufficient time for database updates from the required implementation/data collection date.
IL: IATP has no concern with any of the proposed changes that either provides clarification descriptions, reconfiguration of existing data or a reporting rule change.
AZ: AzTAP does not have concerns with any of the proposed changes that either provides clarifications of descriptions, reconfigurations of existing data or a reporting rule change.
Linda Jaco, Director, Oklahoma AT Program: Regarding collecting data on device demonstration decision makers (separate from the demonstration) it's understood that the individual with a disability is the decision-maker unless unable to be and then it's the caregiver's/provider's decision that there would only be one decision-maker per demonstration. This would mean that the number of device demonstration activities impacted and no extra database activities would need to be conducted to split apart participants. In every circumstance, it could be a decision, so we disagree with the idea of collecting decision maker participant information separately.
ATAP: Members disagree with the idea of collecting decision maker participant information separately. ATAP Members recommend that the requirements of the decision maker and it is only reported once.
Kathy Adams, AT Specialist Consultant, Maine AT Program: The Maine CITE Program disagrees with the idea of collecting separate information and recommends that there should not be duplicative reporting requirements of the decision maker and that it be reported just once.

ATAP: Please clarify if there will no longer be an individual program satisfaction rating, but once these changes are adopted, there will be a percentage. For example, if a program looks at one of their particular outcome measures which is 70 percent, under this new language it will be aggregated and combined with all programs and there will no longer be individual program benchmarks. Please confirm the adjustment. If it is confirmed that programs are not to have an "individual" benchmark, ATAP members recommend this be reported just once.
ME: Maine CITE asks if this means that if there is no longer an individual state program satisfaction rating and there will only be a percentage. For example, if a state program looks at one of their outcome measures which is 70 percent, under this newly proposed language it will be aggregated and combined with all programs and there will no longer be individual program benchmarks. As has been our practice, the state program which provides ongoing incentive to hit higher benchmarks.

OK: With such a high I&A volume, the burden of collecting this information will involve many more hours/days/weeks of data staff. These types of additional data collection tasks tip the "economy of scale" for inputs and outputs resulting in additional inputs. IL: IATP questions the value and purpose of the information being requested through the additional data elements to the APR. With limited funding and honestly we have a great difficulty providing services to the over 25,000 annually that we reach. Requiring more data to be conducted beyond our standard approach will only ensure that we will not be able to adequately or appropriately serve individuals. This will have a very negative impact on our agency. I think that there are other ways that information about creative public awareness activities could be gathered and shared through the APR or CATADA. In addition, seeing the additional data element as programmatic activities will damage the reputation the additional data elements will require IATP to revise its data collection system, retrain staff on data collection procedures, and serve our customers we serve by requiring them to complete yet another question on the Customer Survey form. So to summarize, IATP has concerns in the Public Awareness and Information Awareness sections.

David Baker, Director, Missouri AT Program: This proposed data element change MoAT finds to be extremely confusing and makes our internal data collection system difficult at best. In addition, the drop-down list seems to combine public awareness activities and information related to how to count participants and fidelity of data. As it stands now, Missouri Assistive Technology is not supportive of this change. It either be eliminated or postponed until it can be further studied and refined by a work group.

WI: Collecting referral source data for information and assistance contacts will be a beneficial data point for identifying areas of need and partnerships for State Assistive Technology Programs. However, the description in the proposed APR revision leaves this data element unclear. Instructions are needed as to whether this applies strictly to information and assistance contacts or if this data should be collected from a potential referral list is not comprehensive or narrow enough to provide the data that it appears ACL is attempting to collect. This data is not of the AT services defined in the AT Act, including information and assistance. It is unclear what impact or burden need to collect this data on subcontractors in their day-to-day data collection processes and database. The majority of our subcontractors are Independent Living programs that they use already have some misalignment with what the data the APR requires. Without further clarity and the data to be listed, it will be challenging for our subcontractors to gather this information.

AZ: AzTAP does take issue with the new data element added to the Public Awareness and Information Assistance sections of the APR. We are concerned about the value and purpose of the information being requested through the additional data elements to the APR. 1) due to limited funding, 2) it is challenging to fulfill all service requests across the seven required AT Act Activities, 3) mandating more data to be conducted beyond our current capacity will result in our inability to adequately and appropriately serve individuals with disabilities. This will have a negative impact on our program by diluting our efforts in our areas. As an alternative, currently available APR and/or data on public awareness approaches and strategies successfully implemented by AT Act Programs without further straining existing AT Act programs will also require AzTAP and other AT Programs to revise our data collection systems, retrain staff on these new data collection elements on the customers served through AzTAP by requiring them to complete another question on the customer survey form.

ATAP: Members are very concerned with the level of accuracy this question will solicit. Furthermore, it is time consuming and costly to collect information and yet, that staff time dedicated to tracking and submitting this, will not yield an accurate portrayal of referrals. This will involve many more hours, days and weeks of data entry with already limited staff. These types of additional data collection tasks tip the economy of scale resulting in additional inputs but no additional outputs. The reporting table is too robust and needs prioritization. Member adoption of this language until a more reasonable and effective strategy is developed to procure the data attempted to be collected. We recommend for programs to focus on one specific outreach activity and measure if that specific event increased the program's connection with the community. included in the various outreach strategies tracked moving forward. State AT programs believe this data collection for the budget.

IL: IATP has no concern with any of the proposed changes that either provides clarification descriptions, reconfiguration of existing data elements. AZ: AzTAP does not have concerns with any of the proposed changes that either provides clarifications of descriptions, reconfiguration of data elements, or change.

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ME: Maine CITE very much appreciates the updated revisions to the AT Type taxonomy. This is an essential document to use with comprehensive statewide AT services.

ACL Response

No change. Clarification provided.

No change. Clarification provided.

No change.
ACL will clarify the timeline for implementation to begin with federal fiscal year 2022, with first data collection October 1, 2021 to provide time for data system revision.

No change.
No duplicative data is collected. The decision-maker type is only reported once. ACL will clarify the timeline for implementation to begin with federal fiscal year 2022, with first data collection October 1, 2021 to provide time for data system revision.

No change in tables. Clarification of ACL target application only to national aggregate.

ACL is appreciative of the participation of AT stakeholders in the Federal Register Notice comment process and values the submission of comments on the proposed updates to the Public Awareness and Information and Assistance sections of the AT APR data collection instrument. Once approved, ACL intends to address and work through these changes with AT stakeholders to identify the most efficient and effective way to collect referral source data in the Information Collection.

No change.

No change.

No change.