



To: Julie Wise  
Office of Information and Regulatory Affairs

From: Tomakie Washington  
Administration for Community Living

Re: COVID-19 non-substantive modifications to the No Wrong Door Management Tool under OMB# 0985-0062

Date: March 10, 2021

The Office of Network Development (ONA) uses a subset of the OMB approved No Wrong Door Management Tool (NWD MT) (OMB# 0985-0062) as the semi-annual reporting requirement for the 55 states and territories receiving ADRC COVID-19 Emergency CARES Act funding. This request is a non-substantive change to the currently approved NWD MT in order to collect metrics specific to CARES Act funding and the changing landscape of the COVID-19 pandemic.

As background, the purpose of the NWD MT data collection is to provide a platform for documenting key elements that are necessary to evaluate the progress of the NWD System model and to understand and document the extent to which a state's NWD System is streamlining and coordinating access to long term services and supports (LTSS.) The NWD MT tracks key performance measures and identifies best practices and technical assistance needs. It also supports ACL in tracking performance outcomes and efficiency measures with respect to the annual and long-term performance targets established in compliance with the Government Performance Results Modernization Act (GPRMA).

ACL proposes an update to the NWD MT with three additional metrics to allow grantees to report on 1) activities paid for by CARES Act funds, 2) ADRC involvement in COVID-19 vaccine rollout, and 3) state/territory specific legislation that define or dedicate ADRC/NWD programs and services. Without clearly identifying CARES Act activities from other NWD activities, ACL will not be able to distinguish services provided with the funding and will not be able to report on grantee's critical COVID relief efforts. In addition, to support priorities for vaccine rollout, specific time sensitive collection of this data is needed from the states and territories.

Burden changes are minimal; all of the information is collected or known by state and territory ADRC/NWD programs and would not necessitate new data collection processes for the grantees. In addition, using a subset of questions from the NWD MT for the semi-annual reporting is already a reduced burden from the approved data collection instrument. For these reasons, the proposed updates fit the terms of clearance for a non-substantive/no material change request under the PRA.

Cc:  
Kelly Cronin, Deputy Administrator  
Center for Innovation and Partnership

Joseph Lugo, Director  
Office of Network Advancement