

A 60-day notice published in the *Federal Register*, Vol. 87, No. 26 7182 FRN on February 8, 2022. ACL received 32 comments from 7 entities in response to the 60-day notice. Comments included concerns relating to demographic information, burden of effort, estimate of the developmental disabilities' population, and clarification needed in the guidance document.

Organization	Section	Comment	Response
Disability Rights Maine	1C	Noted demographic information collected could be improved to better reflect diversity and cultural competency. The current choices are male and female. Recommended including a broad range of gender identify options. In addition, there is limited information on racial and ethnic diversity of individuals served. Recommended including whether a person is part of an immigrant community.	ACL intends to update this element to reflect appropriate gender identity options.
Disability Rights Maine	Part 3	Recommended including additional demographic information about the board, staff, and advisory council, similar to recommendations for 1C.	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Maine	None	Burden of hours of 140 to compile the One-PPR is correct; however, this estimate does not include the amount of time spent by staff to collect and input required information in its case management system.	As a result of the required information, no changes will be made at this time.
Disability Rights Michigan	None	The amount of time spent for this report is cumbersome, unnecessarily duplicative, and feels unconnected to the overall "why". The team of four spent 203 hours over 3 months to complete the report. The time and resources required to complete this report would be better spent serving clients. Additionally, the data reporting requirements also interact with this P&A's timekeeping and accounting systems, creating additional reporting complexity for grant projects. Recommended requesting information similarly to the PAIR report.	As a result of the required information, no changes will be made at this time.
Disability Rights Michigan	1A	This comment relates to 1A-I, 1J-P, 2A, 3A, 3B, 3C-J. The number of people served, cases closed, cases opened, people impacted and other categories are reported in six sections	Upon review of the current PPRs, no

		of the report. The data reporting is duplicative and confusing.	changes will be made at this time.
Disability Rights Michigan	1C	Gender reporting is currently limited to male and female. Recommended expanding the choice to create a truer description of the gender identities of the people served.	ACL intends to update this element to reflect appropriate gender identity options.
Disability Rights New York	1C	This section requires reporting on the gender of individuals serviced. The current choices are male and female. P&As across the nation proudly support LGBTQ people with disabilities. Recommended permitting a broader array of responses, which would result in a negligible increase in the reporting burden on the P&As. However, it would make a marked difference in the ability of P&As to collect and report accurate and affirming gender demographic information.	ACL intends to update this element to reflect appropriate gender identity options.
Disability Rights Pennsylvania		Commend ACL and NDRN for the important work and vital support and guidance provided. Would like One-PPR streamlined so as not to divert time to reporting that could be spent on substantive work and to provide information that is more understandable, straightforward, and useful to the government and the public.	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Pennsylvania	1L	Most group cases are not focused on specific living arrangements or ages, creating confusion as to whether multiple living arrangements or ages should be chosen.	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Pennsylvania	1O	Most group cases are not focused on specific living arrangements or ages, creating confusion as to whether multiple living arrangements or ages should be chosen.	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Pennsylvania	1P	Seeks information about "race/ethnicity of groups served" but noted that the information is included in IJ6.	The guide has been updated.

Disability Rights Pennsylvania	2A	This reflects goals and priorities for the completed fiscal year; unfortunately, the result is not a reader-friendly report. The result narratives are effectively limited to activities that have quantifiable outcomes based on the performance measurements, which are not sufficiently comprehensive. Additionally, "end outcomes" and "performance measures" are viewed as the same.	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Pennsylvania	Part 3	The term "performance measurements" is confusing when it appears to mean "end outcomes". Eleven end outcomes/performance measures are in some ways repetitive and in many ways not comprehensive.	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Pennsylvania	3A	Reporting on end outcomes for systemic litigation, educating policy makers, and other systemic activities is challenging because it does not really allow P&A to avoid duplication.	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Pennsylvania	3B	One-PPR asks for the number of people whose rights were advanced through class or system-impact litigation and for people whose rights were enforced, protected, or restored by non-litigation group activities. There is a potential for duplication due to data requested in 3A.	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Pennsylvania	2D	Information in this section is the same from year-to-year so it is unclear why it needs to be repeated annually.	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Pennsylvania	Part 5	This section requires the P&A to identify collaboration partners, but it is unclear what constitutes a collaboration partner.	Upon review of the current PPRs, no changes will be made at this time.

Disability Rights Pennsylvania	6C	This section asks for information on the number of Board members who are primary or secondary PADD, PATBI, PAIMI, PAIR, or PABSS consumers and who are AT users. Some board members may fall into more than one category but the P&A can only choose to put them in one category. This information is not an accurate reflection of consumer involvement in the Board.	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Pennsylvania		On page 20 of Guide, the number of clients for PADD can never exceed 1.58% of a state's population, yet the DD population almost certainly exceed 1.58%. Recommended updating this figure or allowing each P&A to calculate based on their jurisdiction.	While the 1.58% has not been changed, a clarifying sentence was added to the guide.
Disability Rights Pennsylvania	None	Recommended reconsidering the definition of "individual advocacy".	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Wisconsin	1B	Recommended removing problems and subproblems used infrequently	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Wisconsin	1E	Noted #1 and #2 are not mutually exclusive. Concerned about the way in which fully and partially met goals are categorized. Recommended combining #8 and #9.	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Wisconsin	1P	Recommended revising instructions relating to how group projects should be counted, to provide clarity.	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Wisconsin	Part 2	Noted it is time-consuming to provide narrative for each example. Recommended allowing for more broad discussion on goals and priorities and eliminate quantitative measures.	As a result of the required information, no changes will be made at this time.
Disability Rights Wisconsin	Part 3	Noted small differences in performance measures. Recommended changing performance measures in Part 3D; 3F; 3G;	Upon review of the current PPRs, no changes will be made at this time.

		and 3H. Additional instructions are needed in Guide.	
Disability Rights Wisconsin	Part 3.C	Considered #3 duplicative of Part 1E.	Upon review of the current PPRs, no changes will be made at this time.
Disability Rights Wisconsin	None	Noted that report is extremely time consuming since data and narratives are requested in different ways. One-PPR attempts to quantify result of P&A work, but it does not do enough to ensure that numbers reported have an understandable meaning. Additionally, there is little guidance on what numbers should be used for various types of activities. However, even if this guidance was thorough, there is too much to report on.	As a result of the required information, no changes will be made at this time.
Family & Friends of Care Facility Residents	None	Reporting of use of public funds to the administering agency by federal grantees is necessary. Accurate, non-partisan reporting by the protection and advocacy systems must be foundational for ACL. As the administering agency, ACL must assure accountability for the proper use of federal funds from the programs for which it is responsible. ACL's responsibilities include oversight of the activities of four programs created under the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (DD Act): (1) Protection and Advocacy System for Persons with Developmental Disabilities (PADD), (2) State Councils on Developmental Disabilities (CDD), (3) University Centers for Excellence in Developmental Disabilities (UCEDD) and (4) Projects of National Significance (PNS).	No changes were recommended

<p>Family & Friends of Care Facility Residents</p>		<p>DD Act programs operate in every state. Accurate reporting to ACL by the four DD Act programs, including protection and advocacy systems for persons with developmental disabilities (PADD) is fundamental in meeting accountability requirements for programs receiving federal funds. It is necessary that the administering agency (ACL) understand PADDs' goals, activities and outcomes for the nation's diverse populations with developmental disabilities, the situations of their families and the range of services offered by states. The impact of PADD's activities on families of persons with disabilities and the states' human service systems have not been accurately reported. The report forms used by PADD do not transmit the information of vulnerable people living with lifelong disabilities and of federal grant programs which use litigation as a tool to eliminate long-term care facilities for citizens unable to care for themselves (PADD's "systems change" goals). Further, it is not a requirement of PADD to submit data in their reports to ACL on mortality and sentinel events (911 calls or ER visits) of citizens with cognitive and developmental disabilities. See for example the deaths of vulnerable residents in GA and VA following their forced transitions from long-term care facilities.</p>	<p>Upon review of the current PPRs, no changes will be made at this time.</p>
<p>Family & Friends of Care Facility Residents</p>	<p>None</p>	<p>Persons who are impacted by ACL policies and DD Act program activities, including P&As have been excluded from policymaking by the agency. ACL last held public hearings ("Listening Sessions") in 2010. The nearest ACL Listening Session to Arkansas families was in Dallas, Texas and three of our family members attended. Our experience was that families of persons with high-needs-care and who receive services in a long-term care facility were excluded from Day Two of the listening session. Despite our request (submitted in writing to ACL) to come to D.C.</p>	<p>No changes were recommended</p>

		to participate in the agency’s strategic planning sessions, we were not notified or invited. Later, we found the published reports of the listening sessions to be inaccurate and highly partisan.	
Family & Friends of Care Facility Residents	None	Simple forms with boxes to check are insufficient to accurately and fully report the diverse and complex realities of the population with developmental disabilities to ACL. Health and safety of persons unable to care for themselves who are nonverbal and for whom there is no cure, their aging primary caregivers, the lack of specialized, licensed long-term care facilities for persons with cognitive and developmental disabilities, and the use of jails and hospitals as emergency placements for high-needs persons are but some of the information which ACL should be receiving.	Upon review of the current PPRs, no changes will be made at this time.
National Disability Rights Network	1C	The choices for the gender demographic question, nor the two answers appropriately reflect the time in which we live. It is not uncommon for P&A staff to feel constrained by the traditional definitions of female and male. Recommended broadening the choices to: Male, Female, Not Listed, Choose Not to Answer.	ACL intends to update this element to reflect appropriate gender identity options.