



*Improving the Lives of Older Adults and People with Disabilities
Through Services, Research, and Education*

To: Julie Wise
Office of Information and Regulatory Affairs

Through: Tomakie Washington
ACL PRA Portfolio Manager

From: Erica McFadden
Director, Office of Independent Living Programs

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

Date: August 23, 2022

The Office of Independent Living Programs (OILP) must update the currently approved Centers for Independent Living (CIL) Program Performance Report (PPR) 0985-0061 to include reporting requirements for Expanding Disabilities Network's (CILs) Access to COVID-19 Vaccines. ACL would like to request a non-substantive change to the currently approved CIL PPR.

Quick background on the currently approved CIL PPR 0985-0061

ACL uses the CIL PPRs 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. These PPRs are primarily used to provide and design training technical assistance programs, further assess compliance when appropriate, approve or deny continuations as appropriate, and terminate grants when necessary.

ACL needs to update the CIL PPR to include guidance and an updated instrument, which highlights data elements required by different CIL grantees to report all activities that the CIL grantees did with Expanding Disabilities Network's (CILs) Access to COVID-19 Vaccines. Without clearly distinguishing activities done with this funding from activities done with other funding, ACL will not know what services were provided with this funding.

Updated data fields report activities used with the Expanding Disabilities Network's (CILs) Access to COVID-19 Vaccines funding, outcomes, collaboration with other ACL partners (i.e., aging and disability resource centers, area agencies on aging, centers for independent living, developmental disabilities councils, protection & advocacy agencies, and university centers on excellence in developmental disabilities) and other community-based organizations, lessons learned, and recommendations for future activities.

With answers limited to 500 words per grantee per data field, any possible burden increase or decrease is very minimal since CILs currently collect this information.

The data collection activity will be updated via a supplemental or separate reporting tool. OILP expressed concerns that if these activities are lumped into the regular Part C PPR, the info will be lost or increase the potential for fraud and/or abuse of funds. By highlighting the Expanding Disabilities Network's (CILs) Access to COVID-19 Vaccines data elements as a supplemental instrument and providing a guidance document in the currently approved CIL IC, ACL can more quickly identify Expanding Disabilities Network's (CILs) Access to COVID-19 Vaccines activities from Part C funded activities. The Expanding Disabilities Network's (CILs) Access to COVID-19 Vaccines reporting is due 90 days after September 30.

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

Cc: Jill Jacobs
Commissioner, Administration on Disabilities