Title VI PPR Revision 60 Day Comments and ACL Responses

ACL received comments from ten (10) organizations and two (2) individuals about the Program Performance Report (PPR) redesign. ACL reviewed all of the comments. However, some of the comments were deemed to not be relevant because they were: (a) about the data submission process itself; (b) did not request a change; (c) only related to format; or (d) indicated topics for technical assistance and training for the final data collection. For ease of review, the remaining comments and their responses have been grouped by topic or issue. The ACL responses for each topic/issue are detailed below:

| **Topic/Issue** | **Comment** | **ACL Response** |
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| Additional comment boxes for story telling | One of the comments was to include a comment box to the PPR to allow for programs to better share their stories | ACL has added a comment box at the end of the PPR for program staff to share contextual information about how their program is addressing the needs of Elders in their community.  |
| Additional data reporting | There were some concerns expressed around having to keep track of and report additional data.  | Although ACL understands that reporting can be a burdensome process, having better and richer data is a priority for the Title VI program, particularly where it allows us to align with the data collection for Title III. |
| “Tribal Organization” | There was a suggestion posited by two organizations to change the term “Tribal Organization” to something more encompassing.  | ACL has decided to use the term “Grantee Name” to be more inclusive of tribal consortia, Native Hawaiian organizations, and other entities that did not feel covered under the previous term of “Tribal Organization”. |
| Staffing/Volunteers | Five organizations commented that they found the prospect of collecting data on volunteers and their hours to be an unnecessary reporting burden.  | Upon consideration of the issues brought up through the FRN comments, ACL has decided to remove the question on volunteers and volunteer hours.  |
| Nutrition Questions | There was one comment noting that there were too many questions around nutrition education and counseling.  | ACL understands that reporting can be a burdensome process and so have updated the questions under “Other Nutrition Services” to only ask one additional question regarding number of persons receiving nutrition counseling. In keeping with Title III’s SPR we have updated Nutrition Education hours to “sessions”. |
| Meal Mileage | There were many comments (both positive and asking for clarification) related to a proposed question around home-delivered meal mileage.  | ACL has decided to remove this question from the PPR and will consider posing it to grantees through a different data collection source at a later date.  |
| Ombudsman | Removal of the ombudsman question.  | ACL will not add an ombudsman question back into the Title VI PPR as official ombudsman services should be reported through the State Ombudsman and collected in the NORS tool. However, ACL has decided to add in a question related to visiting nursing homes and other assisted living facilities as we agree that these activities are important to capture.  |
| Other Supportive Services | Suggestions to add space for grantees to report on the types of supportive services they provide.  | ACL has decided to add an optional text box for programs to share other supportive services they may offer that are not currently listed.  |
| Transportation | Suggestions to split transportation into assisted and unassisted as they are in Title III’s SPR.  | ACL appreciates the suggestion to collect more data but has decided in the interest of balancing data collection and burden to not make the distinction between the different “types” of transportation provided by a program.  |
| Social Events | Question about the purpose of “social events held” and whether it would be better to change to social/recreation events held” to allow cost sharing with Title III.  | Title III does not ask for this information. A social event, as it is being defined in Title VI, can be recorded as “Other” in SPR.  |
| Finance Section for Part A/B | The comments on the newly added finance section for Part A/B were varied and ran from asking that the question be removed and others asking for more options to share data.  | ACL is sensitive to the burden that may be caused by asking for new kinds of information from our grantees, we find that requiring this information will allow us to better advocate for our programs and their financial needs. Based on the comments ACL has added an optional text box for grantees to explain more about their financial situations, and has also added additional options under the section asking for types of funding used.  |
| Caregiver (language) | Suggestions to change some of the language in the caregiver section to make it clearer.  | ACL has updated the language in this section to be less wordy and using the term “caregiver” rather than “persons” to make it clearer that the intended recipients of services are caregivers and not those they care for.  |
| Caregiver (Information and Assistance) | There were a couple of suggestions that Information and Assistance should be separated from one another.  | ACL has chosen to maintain consistency in this area with Title III’s SPR and will ensure that training and technical materials make it clear how we are defining Information and Assistance and how to best collect it.  |
| Finance Section for Part C | Suggestion to not add the finance section and asking for the cost of respite care to be pulled out. | ACL is sensitive to the burden that may be caused by asking for new kinds of information from our grantees, we find that requiring this information will allow us to better advocate for our programs and their financial needs. ACL chose respite care from the five required services based on the thinking that the cost of this service would be easier to track.  |