

# DISABILITY AND REHABILITATION RESEARCH COALITION

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## **COMMENTS TO THE INTERAGENCY COMMITTEE ON DISABILITY RESEARCH REGARDING THE ICDR STRATEGIC PLAN FRAMEWORK AND GOALS**

**MARCH 7, 2016**

On behalf of the Disability and Rehabilitation Research Coalition (DRRC), we would like to provide a response to the materials shared with individuals participating in the ICDR Strategic Plan—Stakeholder Input Webinar held on March 2, 2016 and additional materials included on your website related to the strategic plan framework and goals.

The DRRC is a coalition of national non-profit organizations committed to improving the state of disability, independent living, and rehabilitation research. DRRC seeks to maximize the return on the federal investment in such research with the goal of improving the ability of Americans with disabilities to live and function as independently as possible. DRRC plays a leadership role in increasing and leveraging federal resources devoted to disability, independent living, and rehabilitation research.

When the Interagency Committee on Disability Research (ICDR) was established by legislation, Congress had high expectations that it would promote ongoing meaningful coordination and cooperation among federal departments and agencies conducting disability, independent living, and rehabilitation research programs, including identification, assessment, and coordination of all federal programs, activities and projects and plans for such programs, projects and activities. Congress directed the ICDR to submit an annual report making recommendations with respect to coordination of policy and development of objectives and priorities for all federal programs relating to the conduct of research on disability and rehabilitation of individuals with disabilities.

Over the years, DRRC has made several recommendations to Congress for improving the quality of disability, independent living, and rehabilitation research conducted by the federal government. Our recommendations have been based in large part on reports on disability prepared by the Institute of Medicine (IOM), reports by federal agencies, reports by prominent researchers in the field of disability and rehabilitation research, and discussions with individual members of the DRRC. The IOM reports on disability include: *Disability in America: Toward a National Agenda for Prevention* (1991 IOM Report); *Enabling America: Assessing the Role of Rehabilitation Science and Engineering* (1997 IOM Report); and *The Future of Disability in America* (2007 IOM Report).

DRRC believes that research plays a critical role in improving the ability of Americans with disabilities to live and function in society as independently as possible. The federal government has a central role to play in developing and implementing a comprehensive research agenda focused on disability, independent living, and the rehabilitation of individuals with disabilities. DRRC also believes that coordination, cooperation, and collaboration regarding the design and

implementation of disability, independent living, and rehabilitation research is critical among federal agencies conducting research, agencies funding treatment and services; foundations and the private sector; and international organizations.

Consistent with our overarching beliefs, we were pleased when the recently enacted Workforce Innovation and Opportunity Act included an amendment to Title II of the Rehabilitation Act directing ICDR to develop and submit to Congress a comprehensive government-wide strategic plan for disability, independent living, and rehabilitation research. Specifically, the new law specifies that:

- (1) The ICDR shall develop a comprehensive government wide strategic plan for disability, independent living, and rehabilitation research.
- (2) The strategic plan shall include, at a minimum—
  - (A) a description of the—
    - (i) measurable goals and objectives;
    - (ii) existing resources each agency will devote to carrying out the plan;
    - (iii) timetables for completing the projects outlined in the plan; and
    - (iv) assignment of responsible individuals and agencies for carrying out the research activities;
  - (B) research priorities and recommendations;
  - (C) a description of how funds from each agency will be combined, as appropriate, for projects administered among Federal agencies, and how such funds will be administered;
  - (D) the development and ongoing maintenance of a searchable government wide inventory of disability, independent living, and rehabilitation research for trend and data analysis across Federal agencies;
  - (E) guiding principles, policies, and procedures, consistent with the best research practices available, for conducting and administering disability, independent living, and rehabilitation research across Federal agencies; and
  - (F) a summary of underemphasized and duplicative areas of research.
- (3) The strategic plan described in this subsection shall be submitted to the President and the Committee on Health, Education, Labor, and Pensions of the Senate and the Committee on Education and the Workforce of the House of Representatives and include a report of the progress made in implementing the strategic plan and detailed budget information.

The inclusion of this comprehensive government-wide strategic plan for disability, independent living, and rehabilitation research is clearly intended to supplement and not supplant ICDR’s own specific annual plan of action, which may include “a small, achievable list of priorities that can move forward.” [See January 20, 2016 document entitled “Proposed Working Group Plans”]

**The comprehensive, government-wide strategic plan was intended to reflect an extensive review of current initiatives, planning, and cooperation and coordination among federal agencies and extensive input from stakeholders. It was intended to serve as a “roadmap” to guide disability, independent living, and rehabilitation research by all federal agencies, not just “the small achievable list of priorities” referred to above; and this roadmap was intended to guide the actions of federal agencies for multiple years with periodic reporting of progress to Congress.**

We continue to be concerned (original concerns submitted on November 11, 2005) that the materials presented at the webinar and the processes used to secure stakeholder input do not adequately effectuate congressional intent. The following specific example is illustrative of our concerns. In accordance with the statute, the comprehensive government-wide strategic plan must address, among other things, rehabilitation research. Based on our review of the materials made available via email and on your website, we were unable to identify how the strategic plan would address each of the following statutory requirements pertaining to rehabilitation research.

Consistent with the statute, the strategic plan must include a description of measurable goals and objectives regarding rehabilitation research; existing resources each agency will devote to rehabilitation research; timetables, assignment of responsible individuals and agencies, and rehabilitation research priorities; a description of how funds for rehabilitation research from each federal agency will be combined, as appropriate; the development and ongoing maintenance of a searchable government-wide inventory of rehabilitation research for trend and data analysis across agencies, guiding principles for rehabilitation research; and a summary of underemphasized and duplicative areas of rehabilitation research.

Moving from a specific example relating to rehabilitation research to more general areas of concern regarding disability, independent living, and rehabilitation research, we have identified the following issues for further consideration:

- With respect to the specific provisions of the new law detailed above, for each area of disability, independent living, and rehabilitation research:
  - What are the measurable goals and objectives you are proposing?
  - What are the proposed plans for identifying existing resources each agency will devote to carrying out the plan?
  - What timetables are you proposing for completing the projects outlined in the plan?
  - What assignment of responsible individuals and agencies are you proposing for carrying out the research activities?
  - You identified a number “problem statements” but how do they translate into research priorities and recommendations?
  - What strategies are being proposed to describe how funds from each agency will be combined, as appropriate, for projects administered among Federal agencies, and how such funds will be administered?
  - What is the status of your plans for developing and maintaining a searchable government wide inventory of disability, independent living, and rehabilitation research for trend and data analysis across Federal agencies?

- What are your proposed guiding principles, policies, and procedures, consistent with the best research practices available, for conducting and administering disability, independent living, and rehabilitation research across Federal agencies?
- What steps have been taken to prepare a summary of underemphasized and duplicative areas of research?

Members of the DRRC would like to meet with you at your earliest convenience to discuss how best to proceed in effectuating congressional intent and ensure the development and implementation of a comprehensive, government-wide strategic plan for disability, independent living, and rehabilitation research that will contribute to the improvement of the employment, health and function, and community participation of people with disabilities.

Thank you for consideration of our comments. If you have any questions, please contact us at 202.466.6550.

Sincerely,

**DRRC Coordinators**

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