

# DISABILITY AND REHABILITATION RESEARCH COALITION

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**October 26, 2016**

**DRRC COMMENTS RE:  
Draft Government Wide Strategic Plan FY 2017-2020 Prepared for the  
Interagency Committee on Disability Research (ICDR)**

The members of the Disability and Rehabilitation Research Coalition (DRRC) wish to express our appreciation for providing us and other stakeholders with an opportunity to submit comments regarding the draft “Government Wide Strategic Plan FY 2017-2020” prepared for the Interagency Committee on Disability Research (ICDR).

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

DRRC members recognize that the demographic trends over the next two decades indicate a substantial increase in the number of people with injuries, illnesses, disabilities and chronic conditions resulting from trauma, developmental disability, war related injuries, the effects of chronic illness, and an increasingly aging population. Disability, independent living, and rehabilitation research can and must play a critical role in enabling and empowering individuals with disabilities to live the American dream. This is consistent with the notion that disability is a natural part of the human experience and aligns with the goals of federal disability policy articulated in the American with Disabilities Act (ADA)—equality of opportunity, full participation, independent living and economic self-sufficiency.

Significant disability, independent living, and rehabilitation research continues to be necessary in order to improve care and maximize function, independence and quality of life for people with injuries, illnesses, disabilities and chronic conditions across the lifespan. Translational research can help transform research results into improvements in care at the home and community-based level. Research can help identify optimal outcomes and demonstrate the efficacy (or non-efficacy) of various interventions, services and supports, treatments and devices. This, in turn, leads to appropriate policies that maximize the return on investment of our financial commitments while improving individuals’ quality of life and economic self-sufficiency and the status of our overall economy.

With the imminent change in administration at the federal government level, DRRC believes that there is a window of opportunity to advance the development and implementation of a comprehensive research agenda for disability, independent living, and rehabilitation across the federal government that will:

- Increase federal funding for disability, independent living, and rehabilitation research;
- Enhance the stature, visibility, and recognition of disability, independent living, and rehabilitation research across the federal agencies responsible for supporting this research;
- Improve the coordination, cooperation, and collaboration among federal agencies in supporting disability and rehabilitation research; and
- Increase support for efficacy research, comparative effectiveness research, health care disparities, research capacity, and knowledge translation pertaining to disability, independent living, and rehabilitation research.

We believe that a vehicle currently exists to advance this agenda. This vehicle is the Congressional mandate set out in the Workforce Innovation and Opportunity Act (WIOA) directing the Interagency Committee on Disability Research (ICDR) to develop a comprehensive government wide strategic plan for disability, independent living, and rehabilitation research.

The specific statutory language is set out below.

“... (c)(1) The Committee [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.”

Consistent with the statutory language, our comments are prepared with the following overarching questions in mind:

1. Does the draft Strategic Plan include a description of:

- Measurable goals and objectives?

- Existing resources each agency will devote to carrying out the plan?
  - Timetables for completing the projects outlined in the plan?
  - Assignments of responsible individuals and agencies for carrying out the research activities?
2. Does the draft Strategic Plan include research priorities and recommendations?
  3. Does the draft Strategic Plan include 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?
  4. Does the draft Strategic Plan include a description of 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?
  5. Does the draft Strategic Plan include 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?

Set out below are our specific questions, issues, concerns and recommendations.

### **IS THE DOCUMENT A BACKGROUND PAPER OR A STRATEGIC PLAN?**

Is the draft document a strategic plan prepared by ICDR or a background paper prepared by a contractor to help guide ICDR in the development of a strategic plan?

The title page reads: Interagency Committee on Disability Research: Government Wide Strategic Plan FY 2017-2020 [page 1]. The disclaimer [page 2] states that the draft document was produced by a contractor on behalf of ICDR and, “The views expressed therein do not necessarily represent the positions or policies of the ICDR.” Under the “Introduction” section [page 4] the draft states, “This report contains the overarching framework that undergirds the strategic plan” and, “The ICDR and statutory agencies have considerable work ahead to complete a comprehensive government wide strategic plan containing all of the components mandated by WIOA.” [page 4]

It appears to us that the draft is in fact not a “Strategic Plan” but should be more appropriately characterized as a “background paper” providing a “framework” which was prepared, by a contractor, but not necessarily endorsed by ICDR. This revised characterization of the document as a background paper is also appropriate because the text of the document does not, in fact, include descriptions of many of the components of a strategic plan prescribed in the legislation. Rather, it can be used to “undergird” such as strategic plan.

We recommend that the document and applicable text be revised to reflect this characterization as a background paper to be used by ICDR, in collaboration with other federal agencies, in the development of the actual government wide strategic plan.

## **IS THE DOCUMENT AN ICDR STRATEGIC PLAN OR STRATEGIC PLAN DEVELOPED BY ICDR?**

Under the “Background” section of the document [page 5], the draft recognizes that the, “ICDR has been authorized by WIOA to serve as the body to coordinate the government wide strategic plan.”

We agree with this conceptualization. DRRC believes that the statutory language requires the federal agencies that comprise the ICDR to develop a strategic plan that coordinates all disability, independent living, and rehabilitation research currently performed—and to be performed and supported in the future—by the many agencies of the federal government engaged in this type of research. According to the statutory directive itself, the strategic plan is supposed to be comprehensive and government wide, and identify priorities and coordinate activities to maximize the overall federal investment in this area of research. In sum, the statute directs ICDR to develop a government wide strategic plan for agencies across the federal government that conduct and support this type of research; it does not direct ICDR to develop a strategic plan for the expenditure of its limited resources.

We recommend that the title of the background paper be revised to read as follows: “Background Paper: Development and Implementation of a Government Wide Strategic Plan on Disability, Independent Living, and Rehabilitation Research.” The title page could also indicate that the background paper was prepared for ICDR, as the body responsible for coordinating the development of the strategic plan.

We also recommend that the “Mission, “Vision,” [page 5] and “Guiding Principles for Success” sections of the draft document [page 6] be clarified to reflect the mission, vision, and guiding principles for the strategic plan, not for ICDR as an entity.

## **WHAT IS THE PURPOSE OF THE STRATEGIC PLAN?**

The statutory mandate to develop and implement a government wide strategic plan was intended by Congress to be transformative of the overall federal commitment to disability, independent living, and rehabilitation research. Congress recognized the need to enhance the stature, visibility, and critical role played by disability, independent living, and rehabilitation research and its impact on improving the quality of life of people with injuries, illnesses, disabilities and chronic conditions. Yet, the draft only includes a brief two-paragraph “Background” section [page 5] that does not highlight the critical importance of this endeavor. There is some mention of the hope of ICDR to capitalize on synergies and opportunities of the strategic plan under the section marked “Barriers and Opportunities,” but these paragraphs appear on page 8 instead of being highlighted at the beginning of the report.

We recommend that the introductory section of the report focus on the critical importance of disability, independent living, and rehabilitation research in enhancing lives of people with injuries, illnesses, disabilities and chronic conditions, the prevention of such conditions, and the

transformative nature of the strategic plan itself, including clear reasons why statutorily required and other federal agencies should participate in and provide resources to support and coordinate the strategic plan.

### **WHAT PROCESSES AND TASKS NEED TO BE OPERATIONIZED TO FACILITATE THE DESIGN AND IMPLEMENTATION OF THE STRATEGIC PLAN?**

DRRC supports the identification of the processes and tasks needed to operationalize certain parts of the strategic plan [page 12], including identifying current and planned agency research activities [page 15], securing agency commitments for coordination and collaboration [page 15], promoting and establishing a repository of research materials and best practices [page 16], developing a focused research plan for independent living [page 17], developing a housing research portfolio [page 17], analyzing and advancing quality research methodologies to improve the transition-related evidence base for youth [page 18], developing infusion and inclusion strategies to include persons with disabilities as a target audience among federal agencies conducting health and wellness programs and research initiatives [page 19], and building on emerging federal agency priorities for medical rehabilitation [page 19].

Many of these strategies should be considered as background for the federal agencies in the design and implementation of a government wide strategic plan, including timetables for completing the projects outlined in the plan and assignments of responsible individuals and agencies for carrying out the research activities.

In addition, DRRC supports the inclusion of a separate goal to develop a government wide inventory of disability, independent living, and rehabilitation research [pages 20-21] and promotion of ongoing stakeholder input on gaps and priorities in these research areas.

### **CONCLUSION AND CONTACT INFORMATION**

The draft document presented for public comment provides comprehensive background information that can be used by the ICDR member agencies in formulating a strategic plan that derives organically from each agency's research domain, mission, and authority, and addresses specifically all of the requirements specified in the statute. We look forward to working with ICDR and its member federal agencies to take maximum advantage of the tremendous opportunity afforded by the creation of this government wide strategic plan.

Thank you again for providing us with the opportunity to share our comments. If you have any questions, please contact Bobby Silverstein [email: [bobby.silverstein@ppsv.com](mailto:bobby.silverstein@ppsv.com); phone: 202.466.6550] or Peter Thomas [email: [peter.thomas@ppsv.com](mailto:peter.thomas@ppsv.com); phone: 202.466.6550].

## **DRRC Member Organizations 2016**

Academy of Spinal Cord Injury Professionals  
American Academy of Neurology  
American Academy of Orthotists & Prosthetists  
American Academy of Physical Medicine & Rehabilitation  
American Association on Health and Disability  
American Congress of Rehabilitation Medicine  
American Medical Rehabilitation Providers Association  
American Music Therapy Association  
American Occupational Therapy Association  
American Physical Therapy Association  
American Speech-Language-Hearing Association  
American Therapeutic Recreation Association  
Amputee Coalition of America  
Association of Academic Physiatrists  
Association of Rehabilitation Nurses  
Association of University Centers on Disabilities  
Brain Injury Association of America  
Child Neurology Society  
Christopher and Dana Reeve Foundation  
National Association for the Advancement Orthotics & Prosthetics  
National Association of Rehabilitation Research Training Centers  
National Association of State Head Injury Administrators  
National Multiple Sclerosis Society  
Paralyzed Veterans of America  
RESNA  
United Spinal Association