November 26, 2018

Administration for Community Living
330 C Street, SW
Washington, D.C.  20201

Attention:  Ami Patel

The Association of Assistive Technology Act Programs (ATAP) is pleased to provide comments to the Administration for Community Living (ACL) regarding the proposed data collection for No Wrong Door (NWD) Systems.  ATAP represents 55 State and Territory Assistive Technology Programs formula funded under Section 4 of the Assistive Technology (AT) Act.  We are commenting on the portion of the proposed data collection that references ACL Assistive Technology federal funding.

In State Level Question 5 and Local Level Question 1 related to funding of the NWD System, it is unclear if the dollars and percentages to be reported are actual dollars or if that can include in-kind contributions.  One of the choices in those two reporting tables under Federal Funding is "Other ACL Programs" which references Assistive Technology.  We assume that is suggesting that Section 4 AT Act formula funding might be contributed from a State or Territory AT Program grantee. A State/Territory AT Program could make an in-kind contribution to the state or local level NWD system, e.g. they could provide a refurbished AT device allowing an individual to remain in their home as part of their reuse program (state level AT Act activity) or they could provide training on AT for NWD staff/partners (state leadership AT activity).  It is highly unlikely there would be actual Section 4 AT Act dollars being provided to the NWD state system budget as the NWD System functions as outlined for these data points are not authorized activities for use of Section 4 funds under the AT Act.

It would be helpful to clarify if in-kind contributions are or are not to be reported in both of these tables.  If in-kind contributions can be reported, we will be happy to work with ACL to ensure our members understanding the types of collaborative activities that might provide these types of contributions.  If in-kind contributions are not to be reported, the reference to Assistive Technology under Federal Funding should be removed as using Section 4 AT Act dollars to fund NWD functions as described is not an authorized use of those funds. The AT Act does not provide for any discretionary use of Section 4 dollars other than the very prescriptive AT specific state level and state leadership activities.

ATAP appreciates the opportunity to provide these comments on behalf of our 55 State and Territory AT Program members.  Please feel free to contact Audrey Busch, ATAP Director of Policy and Advocacy at 202.344.5674 or audrey.busch@ataporg.org with any questions.

Sincerely,

Audrey Busch
Executive Director, ATAP