

NATIONAL COUNCIL ON DISABILITY STRATEGIC PLAN

FY 2022 – FY 2026



INTRODUCTION

ABOUT NCD

STATUTORY AUTHORITY AND RESPONSIBILITIES

The National Council on Disability (NCD) is an independent federal agency with statutory authority to:

- Review, evaluate, and advise the U.S. Congress, President, and other federal agencies regarding policies, practices, and procedures that impact people with disabilities, including providing legislative proposals when appropriate;
- Assess the extent to which policies, programs, practices, and procedures facilitate or impede the national policies of the Americans with Disabilities Act (ADA):
 - (A) guarantee equal opportunity for all individuals with disabilities, regardless of the nature or severity of the disability; and
 - (B) empower individuals with disabilities to achieve economic self-sufficiency, independent living, and inclusion and integration into all aspects of society;
- Make recommendations to the President, Congress, and other federal agencies regarding ways to better promote the national policies of the ADA;
- Review and evaluate emerging issues affecting people with disabilities at the federal, state, and local levels, and in the private sector;
- Hold hearings to receive testimony and information to inform its work; and
- Appoint advisory committees to inform its work.

NCD is also statutorily charged with preparing and submitting an annual report to Congress entitled, "National Disability Policy: A Progress Report" that assesses the nation's progress in achieving the policies of the ADA.

AGENCY HISTORY

First established as an advisory council within the Department of Education in 1978, NCD became an independent federal agency in 1984. In 1986, NCD recommended the enactment of a civil rights law for people with disabilities and drafted the first version of the bill which was introduced in the House and Senate in 1988. Since enactment of the ADA in

1990, NCD has continued to play a leading role in advising policymakers regarding federal policies that impact people with disabilities.

ORGANIZATIONAL SIZE

NCD is comprised of nine part-time Council Members and twelve full-time career staff. NCD's Council Members include five Members appointed by the President, including the Chair, and four Members appointed by Senate and House leadership. NCD is considered a micro agency with an annual appropriate budget of approximately \$3,350,000.

STAKEHOLDERS

NCD's authorizing statute stipulates NCD is to advise the following parties:

- President
- Congress
- Federal departments, agencies, and other federal entities
- Commissioner of the Rehabilitation Services Administration
- Director of the National Institute on Disability, Independent Living, and Rehabilitation Research
- Interagency Disability Coordinating Council

In addition to NCD's advisees, the larger group with a vested interest in NCD's work includes:

- All Americans with disabilities – all types of disabilities and all ages
- Families and support systems of people with disabilities
- Groups and organizations concerned with people with disabilities
- Employers
- Educators
- Service providers
- Designers and manufacturers
- Other entities that influence the inclusion and participation of Americans with disabilities

STAKEHOLDER ENGAGEMENT

NCD engages its diverse advisees and stakeholders through a variety of means – through frequent telephonic, electronic, and in-person meetings with congressional members and staff; with Administration leadership and staff; with the leadership of other federal agencies and staff; and with disability advocacy groups. NCD regularly engages its broader group of stakeholders through invitational presentations and discussions with subject matter experts at its quarterly council meetings and through quarterly meeting public comment and town hall sessions. NCD frequently convenes disability community stakeholders on behalf of congressional committees and other federal advisory bodies to facilitate action on NCD's frequent advice to policymakers to be inclusive of the views of people with disabilities in development of legislation, regulation, and other policy actions. NCD also regularly hosts meetings with stakeholders at its Washington, DC offices. Finally, NCD utilizes its social media accounts and agency website to conduct

outreach regarding NCD's meetings, research opportunities, and its policy reports. In addition, NCD conducts its research utilizing interviews, focus groups, surveys, and questionnaires.

NCD also solicited stakeholder feedback on the agency's proposed strategic plan by holding a virtual event on August 3, 2021, that was open for public comment in addition to requesting public input via email, as well. These opportunities were announced via NCD's social media, which is disseminated to a combined 62,000 followers, and on the agency website. Further, NCD solicited and received feedback through outreach to the National Council on Independent Living and the organization leaders and members of the Consortium of Citizens with Disabilities.

In addition to comments received directly in response to the strategic plan prompts, NCD also revisited and considered all public comments received throughout the year on a variety of topics as it developed the content of its first-year objectives.

Finally, NCD held a virtual event with invitations to House and Senate authorizing committees welcoming input on the agency's strategic framework for FY22 – FY26. Staff feedback was positive with no suggested revisions provided.

STRATEGIC FRAMEWORK OVERVIEW

NCD's strategic framework consists of a vision statement and a mission statement supported by four strategic goals based on our statutory charge and two more strategic goals essential to supporting the four statutory goals. Each strategic goal is supported by a series of objectives, which describe the direction in which the agency will work to make progress towards its mission. Each objective is supported by specific strategies planned to make progress on the objectives, including cross-agency collaborations where appropriate. The following framework provides an overview of the vision, mission, strategic goals, and each goal's supporting objectives. A detailed view of each objective and its corresponding strategies follows the overview, including examples of performance goals associated with each objective and identification of cross-agency collaborations correlated with objectives' strategies.

VISION STATEMENT

For the past 42 years, the National Council on Disability has been at the forefront of the fight for civil rights for persons with disabilities in the US by advising the President, the Vice President, and federal policymakers on ways to improve the lives of people with disabilities. NCD is, in effect, the agency that serves as the national voice of the disability community within the Federal Government. Today, the challenges before us are enormous. The COVID-19 pandemic has highlighted how out of reach ending health disparities for people with disabilities remains; the unemployment rate for persons with disabilities is nearly double that of persons without disabilities; and those disparities contribute to a poverty rate among persons with disabilities that is nearly three times as high as people without disabilities. As the voice of the disability community within the Federal Government, what NCD envisions moving forward in 2022 and beyond is the establishment of policies that not only end health disparities for people with disabilities, and achieve economic self-sufficiency, but also tackles the myriad of other policy challenges that effect this community of people comprised of over 60 million.

Transportation barriers continue to exist as the disability community continues to suffer from a lack of reliable affordable transportation options, and, in far too many communities, persons with mobility disabilities who utilize mobility devices are forced to compete with vehicular traffic on the streets because of the absence, or the disrepair, of municipal sidewalks and curb cuts. Persons with disabilities are also negatively impacted by federal fiscal policy that always looks to reduce funding for Medicaid, Medicare, Social Security, and other federal programs that persons with disabilities and those who love them desperately depend upon to sustain them. Further, and worth repeating, the COVID-19 pandemic has disproportionately affected the health and well-being of persons with disabilities, who not because of disability per se, but due to underlying health conditions, are at a greater risk for contracting the virus, a higher risk of hospitalization once the virus is contracted, and a greater risk of dying from the virus.

Persons with disabilities are vulnerable to the extreme effects of the virus given the decades of neglect in meaningfully addressing the chronic and profound health disparities between persons with disabilities and those without, and decades of neglect in addressing systemic and pervasive barriers to accessible healthcare. COVID-19 is a pandemic that has unmasked the most extreme and deadly form of ableism manifested in discriminatory crisis standards of care and rationing policies that in many instances categorically defined persons with disabilities as persons whose lives are not worth treating. It is a pandemic that has given license to many healthcare professionals to publicly express their explicit bias against persons with disabilities. This does not have to continue to be the case.

NCD's abiding focus through 2026 will be on healthcare and the breadth of issues associated therewith. Foremost, all things COVID and addressing the harsh lessons learned and that we're still learning from the pandemic; accessibility to healthcare, dental care, behavioral health, etc.; addressing the social determinants of health contributing to the disparities in health and health outcomes; addressing implicit and explicit bias against persons with disabilities in healthcare, including through better training of healthcare professionals; advocating for dedicated funding for home and community-based services; adoption of the Access Board's voluntary standards for accessible medical and diagnostic equipment; not just preserving, but strengthening our federal nondiscrimination rights to accessible healthcare (and beyond); recognizing the importance, and advocating for the protection, of direct service providers and family caregivers; looking for solutions to address the dire communication needs of persons who are deaf, hearing-impaired, blind, visually-impaired and persons with cognitive disabilities in healthcare settings, among many other important related issues to address.

While ending health disparities for people with disabilities will be NCD's primary focus, it will not be our sole focus. We will work closely with federal partners and legislators to work on commitments expressed in the President's disability plan, even as we advise for greater efforts. We will continue to educate policymakers on the incompatibility of arcane disability programs and laws, like subminimum wages paid to people with disabilities, to other modern national disability goals and policies. And we will highlight the disparities in eligibility for, and benefits under, certain federal programs that exist between U.S. citizens with disabilities residing in U.S. territories as compared to their disabled counterparts residing in the mainland and in Hawaii.

As one of the smallest independent federal agencies, by design the Council does not conduct its work alone. The positions we adopt and the advice we formulate will be directly influenced and shaped by the input we receive from the diverse disability community directly (including those residing in and out of group homes, and those in and out of incarceration), from a myriad of national disability advocacy and disability rights organizations, and through inter-agency collaboration. We are stronger together when we work together. The moments when NCD has had its greatest impact and its proud history has shined brightest have been when it has had its work most closely and authentically tied to the often underserved and intersectional community we represent. NCD truly is the

agency that serves as the national voice of the disability community within the Federal Government. With the help of that input, NCD looks forward to the progress that the US will achieve.

MISSION STATEMENT

The mission of NCD is to be a trusted advisor regarding the impact of federal policies on the lives of people with disabilities to the President, Congress, and other federal agencies by developing policy recommendations; reviewing existing policies' effects on the quality of life of people with disabilities; and by engaging policymakers and responding to their requests for assistance accurately, efficiently, and impartially.

STRATEGIC GOALS

1. Develop new disability policy recommendations with a particular emphasis on issues of health disparities, bioethics, employment, independent living, and the inclusion of traditionally underserved communities.
2. Review and analyze both proposed and existing federal policies' impact on people with disabilities.
3. Engage policymakers of both the Administration and Congress and respond to their requests for assistance accurately and efficiently.
4. Gather information from subject matter experts and members of the disability community both of Washington, DC, and nationally, to help inform policymakers' work.
5. Enhance agency operational and programmatic internal controls to effectively service execution of statutory duties.
6. Recruit, retain, and develop a highly qualified professional staff in order to effectively service execution of statutory duties.

STRATEGIC OBJECTIVES

GOAL 1: DEVELOP NEW DISABILITY POLICY RECOMMENDATIONS WITH A PARTICULAR EMPHASIS ON ISSUES OF HEALTH DISPARITIES, BIOETHICS, EMPLOYMENT, INDEPENDENT LIVING, AND THE INCLUSION OF TRADITIONALLY UNDERSERVED COMMUNITIES.

OBJECTIVES:

1. Develop recommendations that help foster quality healthcare and accessibility for people with disabilities in a manner consistent with self-determination through a series of legislative proposals, or a combination of executive, administrative or legislative action.

2. Develop recommendations that enhance equal opportunity for people with disabilities to achieve economic self-sufficiency through the elimination of the Medicaid benefits cliff and a national Medicaid buy-in program.
3. Provide recommendations that promote job growth for people with disabilities through the Small Business Administration 8(a) Business Development Program.
4. Develop recommendations to address the concerns and issues uniquely associated with people with disabilities within tribal communities.
5. Address the disparate treatment of citizens with disabilities residing in Puerto Rico (and disabled citizens in other U.S. territories) under certain federal programs in contrast to their counterparts residing on the mainland.
6. Develop recommendations concerning prenatal interventions to ensure any prenatal interventions do not disproportionately harm people with disabilities as a historically marginalized population.
7. Develop recommendations concerning independent living to ensure related policies include the needs and perspectives of people with disabilities.

GOAL 2: REVIEW AND ANALYZE BOTH PROPOSED AND EXISTING FEDERAL POLICIES' IMPACT ON PEOPLE WITH DISABILITIES.

OBJECTIVES:

1. Provide findings and recommendations regarding disaster and healthcare emergency relief planning and responses with respect to the rights of people with disabilities.
2. Provide recommendations concerning proposed policies of healthcare equity.
3. Provide recommendations concerning proposed policies of pandemic preparedness, including access to Home and Community Based Services.
4. Provide analysis and recommendations concerning economic opportunities for people with disabilities.
5. Provide recommendations concerning an increase in the oral health Medicaid reimbursement rate for people with intellectual and developmental disabilities as a means of saving costs long-term, and recommendations concerning incentivizing oral health care providers to participate in Medicaid
6. Provide recommendations concerning civil rights enforcement.

GOAL 3: ENGAGE POLICYMAKERS OF BOTH THE ADMINISTRATION AND CONGRESS AND RESPOND TO THEIR REQUESTS FOR ASSISTANCE ACCURATELY AND EFFICIENTLY.

OBJECTIVES:

1. Provide timely disability policy briefings for members of the Administration and Hill staff.
2. Provide timely written briefing materials to congressional leadership and members of the Administration on policy priorities of the disability community.
3. Increase the time NCD staff and appointed Council members dedicate to direct engagement of congressional and Administration policymakers with NCD's policy advice.

GOAL 4: GATHER INFORMATION FROM SUBJECT MATTER EXPERTS AND MEMBERS OF THE DISABILITY COMMUNITY BOTH OF WASHINGTON, DC, AND NATIONALLY, TO HELP INFORM POLICYMAKERS' WORK.

OBJECTIVES:

1. Engage the disability community beyond Washington, DC and solicit their views regarding timely policy matters including but not limited to issues of healthcare equity, employment, and the inclusion of traditionally underserved communities.
2. Deliberate and purposeful outreach to disability communities within tribal communities.
3. Deliberate and purposeful outreach to disability communities in United States' territories.
4. Deliberate and purposeful outreach to the community of disabled veterans.
5. Provide opportunities for the disability community to provide input to policymakers on disabilities issues prior to policy decision-making.
6. Develop information gathering partnerships to generate effective intelligence for policymakers to use in weighing issues.

GOAL 5: ENHANCE AGENCY OPERATIONAL AND PROGRAMMATIC INTERNAL CONTROLS TO EFFECTIVELY SERVICE EXECUTION OF STATUTORY DUTIES.

OBJECTIVES:

1. Enhance planning and evaluation of all agency projects to ensure continual improvements.
2. Ensure compliance with financial regulatory and reporting requirements.
3. Regularly evaluate and, as needed, update internal policies and procedures to ensure federal compliance, improved efficiencies, and internal controls.

GOAL 6: RECRUIT, RETAIN, AND DEVELOP A HIGHLY QUALIFIED PROFESSIONAL STAFF IN ORDER TO EFFECTIVELY SERVICE EXECUTION OF STATUTORY DUTIES.

OBJECTIVES:

1. Engage in a human capital management assessment to evaluate staffing and consider opportunities for workforce optimization.
2. Enhance new staff, members, and intern orientation materials and process.
3. Encourage staff to conduct SWOT (strengths, weaknesses, opportunities, and threats) analyses as a means of identifying professional development opportunities and enhancing performance.

DETAILED VIEW OF STRATEGIC GOALS & OBJECTIVES

GOAL 1: DEVELOP NEW DISABILITY POLICY RECOMMENDATIONS WITH A PARTICULAR EMPHASIS ON ISSUES OF HEALTH DISPARITIES, BIOETHICS, EMPLOYMENT, INDEPENDENT LIVING, AND THE INCLUSION OF TRADITIONALLY UNDERSERVED COMMUNITIES.

Overview of Goal:

NCD's strategic goal of developing new policy recommendations, including with respect to independent living, ending health disparities, and confronting issues of bioethics, addresses some of federal policymakers' greatest challenges in the next five years pertaining to the country's health. The necessity of working towards ending health disparities has no doubt been highlighted by the COVID-19 pandemic. Equally paramount is one's ability to live independently through policies that effect travel options and other means; and realizing increased employment among people with disabilities. At a time when employers are faced with challenges in retaining the workforce they need, addressing the unjustly lagging employment rate of people with disabilities could not be timelier. These important issues must be addressed, and they must be addressed with the inclusion of traditionally underserved communities as a matter of equity and justice. It is NCD's intent to continue providing critical insights into newly emerging policy trends.

Against the backdrop of these challenges, NCD has 40 years of careful and thoughtful research, analysis, and policy recommendations to bring to bear regarding many federal programs that have been the subject of many spirited congressional debates in recent times. Much of NCD's research findings and analysis from its extensive body of work are new concepts and ideas to many policymakers and their staff and hold promise in assisting with the solutions to both longstanding and emerging problems.

OBJECTIVES:

1. Develop recommendations that help foster quality healthcare and accessibility for people with disabilities in a manner consistent with self-determination through a series of legislative proposals, or a combination of executive, administrative or legislative action.

Overview of Objective: NCD determined the appropriateness of this objective in view of the nationwide need of, and the current Administration's commitment to, ending health disparities. The COVID-19 pandemic has further highlighted the chronic and profound health disparities between persons with disabilities and those without, and decades of neglect in addressing systemic and pervasive barriers to accessible healthcare for people with disabilities. This objective is also appropriate in view of NCD's statutory duty to "(10) review and evaluate on a continuing basis new and emerging disability policy issues affecting individuals with disabilities at the Federal, State, and local levels."¹

Performance Goal: Develop, release and continue to update recommendations to policymakers of both the executive and legislative branches. Performance indicators include the development of a policy framework to be shared with the Domestic Policy Council, suggested draft legislation language as required, and the sharing of related published policy recommendations to be used in advising policymakers.

2. Develop recommendations that enhance equal opportunity for people with disabilities to achieve economic self-sufficiency through the elimination of the Medicaid benefits cliff and a national Medicaid buy-in program.

¹ 29 U.S.C. 781, Duties of National Council.

Overview of Objective: NCD determined the appropriateness of this objective in view of NCD's statutory duties, which include to "(6) assess the extent to which such policies, programs, practices, and procedures facilitate or impede the promotion of the policies [of: (A) guarantee equal opportunity for all individuals with disabilities, regardless of the nature or severity of the disability];"² in view of the importance of an individual's right to equal opportunity; and the necessity of the nation's reliance on the economic self-sufficiency of its citizenry.

Performance Goal: Develop and release recommendations to policymakers of both the executive and legislative branches. Performance indicators include development of a policy framework to be shared with the Domestic Policy Council, suggested draft legislation language as required, and the sharing of related published policy recommendations to be used in advising policymakers.

3. Provide recommendations that promote job growth for people with disabilities through the Small Business Administration (SBA) 8(a) Business Development Program.

Overview of Objective: NCD determined the appropriateness of this objective in view of NCD's statutory duties, which include to "(10) review and evaluate on a continuing basis new and emerging disability policy issues affecting individuals with disabilities at the Federal, State, and local levels, and in the private sector."³

Performance Goal: Research prior SBA amendments to the 8(a) program, compile recommendations based on NCD's analysis, and draft a letter to the SBA outlining NCD's recommendations.

4. Provide Recommendations on behalf of people with disabilities on tribal lands including with respect to education, healthcare, vocational rehabilitation, and independent living.

Overview of Objective: NCD determined the appropriateness of this objective based on the necessity to ensure people with disabilities' access to equitable systems of care on tribal lands related to education, healthcare, vocational rehabilitation, and independent living.

Performance Goal: By 4th Quarter FY2025, Identify existing and ongoing barriers, opportunities, and progress concerning people with disabilities' access to equitable systems of care on tribal lands related to education, healthcare, vocational rehabilitation, and independent living.

5. Address the disparate treatment of citizens with disabilities residing in Puerto Rico (and disabled citizens in other U.S. territories) under certain federal programs in contrast to their counterparts residing on the mainland.

Overview of Objective: NCD determined the appropriateness of this objective based on

² Ibid.

³ Ibid.

the ongoing disparate treatment of citizens with disabilities residing in Puerto Rico utilizing various federal programs in contrast to their counterparts residing in the states (and disabled citizens in other U.S. territories).

Performance Goal: By 1st quarter FY22, NCD released a policy report with key findings and recommendations to policymakers, and will continue to advise policymakers based on these findings accordingly.

6. Develop recommendations concerning prenatal interventions to ensure any prenatal interventions do not disproportionately harm people with disabilities as a historically marginalized population.

Overview of Objective: NCD determined the appropriateness of this objective based on the development of new prenatal medical capabilities, a consideration of the ethics involved, the need to consider the impact of such technologies on people with disabilities, and the importance of including people with disabilities in the national discussion.

Performance Goal: By 3rd quarter FY24, NCD released a policy report concerning prenatal interventions with key findings and recommendations to policymakers, and will continue to advise policymakers based on these findings accordingly.

7. Develop recommendations concerning independent living to ensure related policies include the needs and perspectives of people with disabilities.

Overview of Objective: NCD determined the appropriateness of this objective based on vital impact policies related to community settings, travel, and emerging technologies have on a person's ability to live independently.

Performance Goal: By 3rd quarter FY25, NCD will release recommendations concerning autonomous vehicles with key findings and recommendations to policymakers, and will continue to advise policymakers based on these findings accordingly. By 3rd quarter 2025, NCD will release a policy report analyzing the growing number of young people in institutional congregate care and the disruptive impact that receiving care in an institutional setting has had on this younger population's education, employment, and social integration outcomes.

GOAL 2: REVIEW AND ANALYZE BOTH PROPOSED AND EXISTING FEDERAL POLICIES' IMPACT ON PEOPLE WITH DISABILITIES.

Overview of Goal:

NCD's strategic goal of reviewing and analyzing proposed and existing federal policies' impact on people with disabilities comes directly from NCD's authorizing statute, which states in part that NCD's duties are to, "review and evaluate on a continuing basis-- (A) policies, programs,

practices, and procedures concerning individuals with disabilities conducted or assisted by Federal departments and agencies...; and (B) all statutes and regulations pertaining to Federal programs which assist such individuals with disabilities;"⁴ and facilitates execution of NCD's statutory mandate to advise the President, Congress, and other federal agencies regarding policies, practices, and procedures that impact people with disabilities.

In its advisory role, NCD has many times been called upon by congressional offices or committee offices to review proposed legislative language, often before its introduction, and / or to offer language that will specifically address unique considerations of the greater than 60 million Americans with disabilities or specific subpopulations' concerns.

OBJECTIVES:

1. Provide findings and recommendations regarding disaster and healthcare emergency relief planning and responses with respect to the rights of people with disabilities.

Overview of Objective: NCD determined the appropriateness of this objective because of ongoing concerns about disaster response plans that do not include sufficient protocols to properly evacuate or shelter people with disabilities. Recent disasters revealed a lack of evacuation planning, inaccessible shelters, and a lack of post-disaster housing options for people with disabilities which resulted in people with disabilities, who lived in the impacted areas, being inappropriately and involuntarily institutionalized in nursing homes and hospitals, separated from family supports, and remaining institutionalized long after the disaster had passed. This objective is also appropriate in view of NCD's statutory duty to "(10) review and evaluate on a continuing basis new and emerging disability policy issues affecting individuals with disabilities at the Federal, State, and local levels."⁵

Performance Goal: Develop and release key findings and recommendations to policymakers beginning in FY22 based on a review and assessment of current related federal laws and advising policymakers accordingly.

2. Provide recommendations concerning proposed policies of ending health disparities.

Overview of Objective: NCD determined the appropriateness of this objective in view of the nationwide need of and the current Administration's commitment to ending health disparities. The COVID-19 pandemic has further highlighted the chronic and profound health disparities between persons with disabilities and those without, and decades of neglect in addressing systemic and pervasive barriers to accessible healthcare for people with disabilities. This objective is also appropriate in view of NCD's statutory duty to "(10) review and evaluate on a continuing basis new and emerging disability policy issues affecting individuals with disabilities at the Federal, State, and local levels."⁶

⁴ Ibid.

⁵ 29 U.S.C. 781, Duties of National Council.

⁶ Ibid.

Performance Goal: Develop and release recommendations to policymakers of both the executive and legislative branches. Performance indicators include development of a policy framework to be shared with the Domestic Policy Council, draft legislation as required, and the sharing of related published policy recommendations to be used in advising policymakers.

3. Provide recommendations concerning proposed policies of pandemic preparedness, including access to Home and Community Based Services.

Overview of Objective: NCD determined the appropriateness of this objective in view of the COVID-19 pandemic and the manner in which people with disabilities were subjected to insufficient care due to insufficient public health emergency planning. This objective is also appropriate in view of NCD's statutory duty to "(10) review and evaluate on a continuing basis new and emerging disability policy issues affecting individuals with disabilities at the Federal, State, and local levels."⁷

Performance Goal: Beginning in FY22, NCD will develop policy recommendations for both the executive and legislative branches based on a review of current public health emergency preparedness laws and processes.

4. Provide analysis and recommendations concerning economic opportunities for people with disabilities.

Overview of Objective: NCD determined the appropriateness of this objective in view of NCD's statutory duties, which include to "(6) assess the extent to which such policies, programs, practices, and procedures facilitate or impede the promotion of the policies [of: (A) guarantee equal opportunity for all individuals with disabilities, regardless of the nature or severity of the disability]; and (B) empower individuals with disabilities to achieve economic self-sufficiency, independent living, and inclusion and integration into all aspects of society];" and to "(10) review and evaluate on a continuing basis new and emerging disability policy issues affecting individuals with disabilities at the Federal, State, and local levels, and in the private sector, including ...policies that operate as disincentives for the individuals to seek and retain employment."⁸ NCD also determined the appropriateness of this objective in light of the persistently high unemployment and underemployment rates of people with disabilities compared to people without disabilities.

Performance Goal: Develop and release recommendations to policymakers of both the executive and legislative branches. Performance indicators include development of a policy framework to be shared with the Domestic Policy Council, draft legislation as required, and the sharing of related published policy recommendations to be used in

⁷ Ibid.

⁸ Ibid.

advising policymakers.

5. Provide recommendations concerning an increase in the oral health Medicaid reimbursement rate for people with intellectual and developmental disabilities as a means of saving costs long-term, and recommendations concerning incentivizing oral health care providers to participate in Medicaid.

Overview of Objective: NCD determined the appropriateness of this objective in light of the persistent inability of people with disabilities that require specialized treatment to obtain access to adequate oral health care, largely due to insufficient Medicaid reimbursement rates and an insufficient number of health providers participating in Medicaid. NCD also determined the appropriateness of this objective in view of NCD's statutory duties, which include to "(6) assess the extent to which such policies, programs, practices, and procedures facilitate or impede the promotion of the policies [of: (A) guarantee equal opportunity for all individuals with disabilities, regardless of the nature or severity of the disability]; and (B) empower individuals with disabilities to achieve economic self-sufficiency, independent living, and inclusion and integration into all aspects of society];" and to "(10) review and evaluate on a continuing basis new and emerging disability policy issues affecting individuals with disabilities at the Federal, State, and local levels."⁹

Performance Goal: Publish two policy reports with key findings and recommendations to policymakers by 1st quarter FY22 (for the first report) and by 3rd quarter FY23 (for the second report).

6. Provide recommendations concerning civil rights enforcement.

Overview of Objective: NCD determined the appropriateness of this objective in light of the persistent reported violations of the rights of people with disabilities, including in the space of voting rights, web and telehealth accessibility, and with respect to abuse suffered in healthcare facilities and group homes (among others). NCD also determined the appropriateness of this objective in view of NCD's statutory duties, which include to "(6) assess the extent to which such policies, programs, practices, and procedures facilitate or impede the promotion of the policies [of: (A) guarantee equal opportunity for all individuals with disabilities, regardless of the nature or severity of the disability]; and (B) empower individuals with disabilities to achieve economic self-sufficiency, independent living, and inclusion and integration into all aspects of society];" and to "(10) review and evaluate on a continuing basis new and emerging disability policy issues affecting individuals with disabilities at the Federal, State, and local levels."¹⁰

Performance Goal: Develop and release recommendations to the United States Department of Justice Civil Rights Division and the United States Department of Health

⁹ 29 U.S.C. 781, Duties of National Council.

¹⁰ Ibid.

and Human Services Office of Civil Rights; and draft related legislation as required.

GOAL 3: ENGAGE POLICYMAKERS OF BOTH THE ADMINISTRATION AND CONGRESS AND RESPOND TO THEIR REQUESTS FOR ASSISTANCE ACCURATELY AND EFFICIENTLY.

Overview of Goal:

NCD's strategic goal of engaging policymakers and responding to their requests for assistance accurately and efficiently and impartially is particularly important given the recently seated new Congress and the start of a new Administration, bringing new leadership, advisors, and support staff to offices in two branches of government.

As a nonpartisan governmental advisory body with a bipartisan board, NCD has a critical role to play in dispensing timely and reliable information to inform policymaking at an individual congressional member office level; at the congressional committee level; at the House and Senate leadership levels; and at the highest levels of Cabinet-level and non-Cabinet-level agency leadership in the Administration.

In the same way that policymakers rely upon the nonpartisan Congressional Budget Office to employ an impartial rendering of accounting and statistical projections to advise of budgetary implications; and upon GAO to provide impartial oversight of the effectiveness and internal controls of federal entities, NCD desires to likewise provide reliable and timely information regarding the implications of certain policy actions or inactions on the welfare of Americans with disabilities.

OBJECTIVES:

1. Provide timely disability policy briefings for members of the Administration and Hill staff.

Overview of Objective: NCD determined the appropriateness of this objective in view of NCD's statutory duties, which include to "(3) advise the President, [and] the Congress..." to "(8) make recommendations to the President, [and] the Congress...respecting ways to better promote the policies set forth in [the ADA]..." and to "(9) provide to the Congress on a continuing basis advice, recommendations, legislative proposals, and any additional information that the National Council or the Congress deems appropriate."¹¹

Performance Goal: In line with specific requests of committee and Member offices, and representatives of the Administration, regarding content, provide at least two congressional briefings a year utilizing NCD research, and meet with and provide recommendations to federal agencies and the White House in line with each NCD recommendation formulated and intended for respective administrative agencies.

2. Provide timely written briefing materials to congressional leadership and members of the Administration on policy priorities of the disability community.

¹¹ Ibid.

Overview of Objective: NCD determined the appropriateness of this objective in view of NCD's statutory duties, which include to "(3) advise the President, [and] the Congress..." to "(8) make recommendations to the President, [and] the Congress...respecting ways to better promote the policies set forth in [the ADA]..." and to "(9) provide to the Congress on a continuing basis advice, recommendations, legislative proposals, and any additional information that the National Council or the Congress deems appropriate."¹²

Performance Goals: In advance of any congressional hearing regarding a topic of priority concern for the disability community, NCD will provide written briefing materials to committee members, including key findings and recommendations from NCD's body of research, as well as suggested questions for witnesses. NCD will further provide suggested legislative language to members of Congress upon request. NCD will also provide policy recommendations in the form of written materials concerning policy issues important to the disability community to representatives of the Administration as necessary.

3. Increase the time NCD staff and appointed Council members dedicate to direct engagement of congressional and Administration policymakers with NCD's policy advice.

Overview of Objective: NCD determined the appropriateness of this objective in view of NCD's statutory duties, which include to "(3) advise the President, [and] the Congress..." to "(8) make recommendations to the President, [and] the Congress...respecting ways to better promote the policies set forth in [the ADA]..." and to "(9) provide to the Congress on a continuing basis advice, recommendations, legislative proposals, and any additional information that the National Council or the Congress deems appropriate."¹³

Performance Goal: During DC-based board meetings and as other opportunities arise, NCD staff will arrange agency and congressional meetings to discuss NCD policy advice and solicit advisee feedback to coincide with the time during which the NCD Council Members will be in town, and pursue meetings as may be appropriate when Congressional Members are in their home districts where Council members reside.

GOAL 4: GATHER INFORMATION FROM SUBJECT MATTER EXPERTS AND MEMBERS OF THE DISABILITY COMMUNITY BOTH OF WASHINGTON, DC, AND NATIONALLY, TO HELP INFORM POLICYMAKERS' WORK.

Overview of Goal:

NCD's strategic goal of gathering information from subject matter experts and members of the disability community to help inform policymakers' work is motivated by a desire to balance hard hitting data that must necessarily undergird federal policies with "on the ground" realities of the

¹² Ibid.

¹³ 29 U.S.C. 781, Duties of National Council.

Americans affected by the problems policymakers seek to solve or are unaffected by previous policies intended to assist.

An example of the importance of including this kind of strategic goal is seen in the experiences of people with disabilities during natural disaster warnings and response. Response very often failed to service practical needs of people with mobility and sensory disabilities, and people perished as a result of both. In the policy reaction to natural disasters that followed, it has required both a clear understanding of the nuance of the problems through the participation of disability community in conjunction with the subject matter expertise of those who could propose how to operationalize solutions to those problems to mark progress.

NCD endeavors to commission policy research projects that honor the blend of those elements to offer recommendations that are inclusive at the outset of the input and feedback of the very individuals whom the recommendations are intended to service.

OBJECTIVES:

1. Engage the disability community beyond Washington, DC and solicit their views regarding timely policy matters including but not limited to issues of health disparities, employment, and the inclusion of traditionally underserved communities.

Overview of Objective: NCD determined the appropriateness of this objective in view of It's analysis and determination based on data and input that these issues are among the most vital in promoting the policies set forth in the ADA. NCD also determined the appropriateness of this objective in view of NCD's statutory duties, which include to "(7) gather information about the implementation, effectiveness, and impact of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.)..." and to "(8) make recommendations to the President, the Congress, ... and other officials of Federal agencies or other Federal entities, respecting ways to better promote the policies set forth in [the ADA]."¹⁴

Performance Goals: At each of its quarterly Council meetings, NCD will continue to incorporate the views of local disability advocates as presenters in its planned policy presentations. NCD will also continue to pointedly solicit disability community input for its annual progress report to Congress to prominently include the views of the community in their own words in that annual report. NCD will also continue to involve individuals from the disability community as speakers in its congressional briefings. NCD will continue to draw attention to the input of the disability community through its policy reports (focus groups, interviews, etc.) and include photos and quotes from the disability community in the layout of its printed and online versions (pull-quotes, emphasis boxes in the layout, e.g.). NCD will continue to invite district staff of Members of Congress from the location of each of its quarterly meetings to attend and hear from their constituents with disabilities who present and make comment. NCD will also continue to involve individuals from the disability community as speakers in its congressional briefings, at which policymakers and their staff are briefed.

¹⁴ Ibid.

2. Deliberate and purposeful outreach to disability communities within tribal communities.

Overview of Objective: NCD determined the appropriateness of this objective in view of NCD's statutory duties, which include to "(7) gather information about the implementation, effectiveness, and impact of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.)..." and to "(6) assess the extent to which such policies, programs, practices, and procedures facilitate or impede the promotion of the policies [of the ADA]..." and to "(8) make recommendations to the President, the Congress, ... and other officials of Federal agencies or other Federal entities, respecting ways to better promote the policies set forth in [the ADA]. [2] . NCD also determined the appropriateness of this objective in view of Executive Order 13175 which requires federal agencies to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, to strengthen the United States government to government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes.

Performance Goals: Beginning n FY22 NCD will identify several subject matter experts on disability within the American Indian and Alaska Native communities to consult on NCD policy objectives to ensure the unique needs of the American Indian and Alaska Native communities are represented in NCD policy work.

3. Deliberate and purposeful outreach to disability communities in United States' territories.

Overview of Objective: NCD determined the appropriateness of this objective in view of NCD's statutory duties, which include to "(7) gather information about the implementation, effectiveness, and impact of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.)..." and to "(6) assess the extent to which such policies, programs, practices, and procedures facilitate or impede the promotion of the policies [of the ADA]..." and to "(8) make recommendations to the President, the Congress, ... and other officials of Federal agencies or other Federal entities, respecting ways to better promote the policies set forth in [the ADA].¹⁵ NCD also determined the appropriateness of this objective in view of the findings in its 2021 report "Disparate Treatment of Puerto Rican Residents with Disabilities in Federal Programs."

Performance Goals: NCD will identify and correspond with stakeholders within the United States' territories and help communicate and coordinate expressed policy concerns with federal agency and congressional representatives.

4. Deliberate and purposeful outreach to the community of disabled veterans.

Overview of Objective: NCD determined the appropriateness of this objective in view of

¹⁵ Ibid.

NCD's statutory duties, which include to "(7) gather information about the implementation, effectiveness, and impact of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.)..." and to "(6) assess the extent to which such policies, programs, practices, and procedures facilitate or impede the promotion of the policies [of the ADA]..." and to "(8) make recommendations to the President, the Congress, ... and other officials of Federal agencies or other Federal entities, respecting ways to better promote the policies set forth in [the ADA].¹⁶ NCD also determined the appropriateness of this objective in view of the fact that meaningful policies cannot be pursued without the express input of the people whose lives those policies are intended to effect, in keeping with NCD's statutory responsibilities.

Performance Goals: NCD will identify and correspond with stakeholders within the community of disabled United States veterans and help communicate and coordinate expressed policy concerns with federal agency and congressional representatives.

5. Provide opportunities for the disability community to provide input to policymakers on disabilities issues prior to policy decision-making.

Overview of Objective: NCD determined the appropriateness of this objective in view of NCD's statutory duties, which include to "(7) gather information about the implementation, effectiveness, and impact of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.)..." and to "(6) assess the extent to which such policies, programs, practices, and procedures facilitate or impede the promotion of the policies [of the ADA]..." and to "(8) make recommendations to the President, the Congress, ... and other officials of Federal agencies or other Federal entities, respecting ways to better promote the policies set forth in [the ADA].¹⁷ NCD also determined the appropriateness of this objective in view of the fact that meaningful policies cannot be pursued without the express input of the people whose lives those policies are intended to effect, in keeping with NCD's statutory responsibilities.

Performance Goals: NCD will continue to proactively seek input from the disability community regarding policy concerns in advance of related congressional and executive action. At each of its quarterly Council meetings, NCD will continue to incorporate the views of local disability advocates as presenters in its planned policy presentations. NCD will also continue to pointedly solicit disability community input for its annual progress report to Congress to prominently include the views of the community in their own words in that annual report. NCD will also continue to involve individuals from the disability community as speakers in its congressional briefings. NCD will continue to draw attention to the input of the disability community through its policy reports (focus groups, interviews, etc.) and include photos and quotes from the disability community in the layout of its printed and online versions (pull-quotes, emphasis boxes in the layout, e.g.). NCD will continue to invite district staff of Members of Congress from the location of each of its quarterly meetings to attend and hear from their constituents with disabilities

¹⁶ Ibid.

¹⁷ 29 U.S.C. 781, Duties of National Council.

who present and make comment. NCD will also continue to involve individuals from the disability community as speakers in its congressional briefings, at which policymakers and their staff are briefed.

6. Develop information gathering partnerships to generate effective intelligence for policymakers to use in weighing issues.

Overview of Objective: NCD determined the appropriateness of this objective in view of NCD's statutory duties, which include to "(7) gather information about the implementation, effectiveness, and impact of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.)..." and to "(6) assess the extent to which such policies, programs, practices, and procedures facilitate or impede the promotion of the policies [of the ADA]..." and to "(8) make recommendations to the President, the Congress, ... and other officials of Federal agencies or other Federal entities, respecting ways to better promote the policies set forth in [the ADA]."¹⁸

Performance Goals: Throughout each fiscal year, NCD will solicit research proposals from entities with deep subject matter expertise and enter into cooperative agreements with them to bring the most helpful information to bear in the advice NCD offers policymakers. NCD will also rely upon iterative review by technical experts of each of its research endeavors throughout each fiscal year to strengthen the accuracy and reliability of its work in each phase of development.

GOAL 5: ENHANCE AGENCY OPERATIONAL AND PROGRAMMATIC INTERNAL CONTROLS TO EFFECTIVELY SERVICE EXECUTION OF STATUTORY DUTIES.

OBJECTIVES:

1. Enhance planning and evaluation of all agency projects to ensure continual improvements.

Overview of Objective: NCD determined the appropriateness of this objective in view of the Program Management Improvement and Accountability Act of 2015 (PMIAA)¹⁹ that was signed into law in December of 2016, which was approved by strong bipartisan support in both chambers. The law seeks to enhance accountability and best practices in project and program management throughout the federal government.

Performance Goals: Each fiscal year, NCD will formally evaluate select projects following their completion and identify any lessons learned and discuss any workflow concerns. Each fiscal year, NCD will identify operational and programmatic risks, update the agency risk profile as appropriate, and review progress against proposed risk responses in the agency risk profile.

¹⁸ Ibid.

¹⁹ Public Law No. 114-264.

2. Ensure compliance with financial regulatory and reporting requirements.

Overview of Objective: NCD determined the appropriateness of this objective in view of federal fiduciary responsibilities of all employees in the public trust.

Performance Goals: Continuing in FY23, NCD will complete an external financial audit no less often than every two years. Each fiscal year, NCD will submit all required financial reports by OMB-approved deadlines.

3. Regularly evaluate and as needed update internal policies and procedures to ensure federal compliance, improved efficiencies, and internal controls.

Overview of Objective: NCD determined the appropriateness of this objective in view of federal fiduciary responsibilities of all employees in the public trust.

Performance Goals: Each fiscal year, NCD will formally evaluate select projects following their completion and identify any lessons learned and discuss any workflow concerns. Each fiscal year, NCD will identify operational and programmatic risks, update the agency risk profile as appropriate, and review progress against proposed risk responses in the agency risk profile.

GOAL 6: RECRUIT, RETAIN, AND DEVELOP A HIGHLY QUALIFIED PROFESSIONAL STAFF IN ORDER TO EFFECTIVELY SERVICE EXECUTION OF STATUTORY DUTIES.

OBJECTIVES:

1. Engage in a human capital management assessment to evaluate staffing and consider opportunities for workforce optimization.

Overview of Objective: NCD determined the appropriateness of this objective in view of human capital resource management principles; and the principles of OPM's Strategic Human Capital Management initiatives.

Performance Goals: Each fiscal year NCD will assess staffing needs and determine best approaches for work force optimization.

2. Enhance new staff, members, and intern orientation materials and process.

Overview of Objective: NCD determined the appropriateness of this objective in anticipation of the onboarding of new councilmembers that join NCD on a rolling basis.

Performance Goals: By the end of the 1st quarter FY23, NCD will update new staff orientation materials. As new employees are hired, NCD will extend this orientation to

each of them and refine the materials as gaps are identified.

3. Encourage staff to conduct SWOT (strengths, weaknesses, opportunities, and threats) analyses as a means of identifying professional development opportunities and enhancing performance.

Overview of Objective: NCD determined the appropriateness of this objective in view of human capital resource management principles; and the principles of OPM's Strategic Human Capital Management initiatives.

Performance Goals: Beginning in the 3rd quarter FY23, NCD will conduct a SWOT analysis on select completed agency projects (e.g. reports, events, quarterly meetings, audit) and identify best practices and process improvement opportunities in each instance. For any skills gaps identified in the analysis, NCD will identify corresponding training opportunities for staff to support performance improvement.

STRATEGIES BY OBJECTIVE

GOAL 1: DEVELOP NEW DISABILITY POLICY RECOMMENDATIONS WITH A PARTICULAR EMPHASIS ON ISSUES OF HEALTH DISPARITIES, BIOETHICS, EMPLOYMENT, INDEPENDENT LIVING, AND THE INCLUSION OF TRADITIONALLY UNDERSERVED COMMUNITIES.

OBJECTIVES:

1. Develop recommendations that help foster quality healthcare and accessibility for people with disabilities in a manner consistent with self-determination through a series of legislative proposals, or a combination of executive, administrative or legislative action.

Strategies:

- a. Assign an Attorney Advisor with expertise to serve as project Lead.
- b. Examine data, current policies and laws, and utilize methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
- c. Develop recommendations that can be drawn from the examination.
- d. The inclusion of people with disabilities must be integral to the planning, development, and execution of this project. The recommendations should reflect NCD's view that the disability community is heterogeneous, with diverse needs and perspectives, and those perspectives should be included.

Cross-Agency Collaborations:

- a. Collaborate with the Department of Health and Human Services on review of findings and recommendations.
- b. Coordinate and meet with the Department of Health and Human Services regarding oversight and implementation of recommendations.

2. Develop recommendations that enhance equal opportunity for people with disabilities to achieve economic self-sufficiency through the elimination of the Medicaid benefits cliff and a national Medicaid buy-in program.

Strategies:

- a. Assign an Attorney Advisor with expertise to serve as project Lead.
- b. Examine data, current policies and laws, and utilize methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
- c. Develop recommendations that can be drawn from the examination.
- d. The inclusion of people with disabilities must be integral to the planning, development, and execution of this project. The recommendations should reflect NCD's view that the disability community is heterogeneous, with diverse needs and perspectives, and those perspectives should be included.

Cross-Agency Collaborations:

- a. Collaborate with the Department of Health and Human Services on review of findings and recommendations.
 - b. Coordinate and meet with the Department of Health and Human Services regarding oversight and implementation of recommendations.
3. Provide recommendations that promotes job growth for people with disabilities through the Small Business Administration 8(a) Business Development Program.

Strategies:

- a. Assign an Attorney Advisor with expertise to serve as project Lead.
- b. Examine data, current policies and laws, and utilize methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
- c. Develop recommendations that can be drawn from the examination.
- d. The inclusion of people with disabilities must be integral to the planning, development, and execution of this project. The recommendations should reflect NCD's view that the disability community is heterogeneous, with diverse needs and perspectives, and those perspectives should be included.

Cross-Agency Collaborations:

Collaborate with the Small Business Administration on review of findings and recommendations, and coordinate concerning implementation of recommendations.

4. Develop recommendations to address the concerns and issues uniquely associated with people with disabilities within tribal communities.

Strategies:

Assign an attorney advisor to act as liaison with the community of people with disabilities within tribal communities.

Cross-Agency Collaborations:

Collaborate across the government with Cabinet-level agencies on technical review of findings and recommendations.

Coordinate and meet with Cabinet-level agencies regarding oversight and implementation of recommendations.

5. Address the disparate treatment of citizens with disabilities residing in Puerto Rico (and disabled citizens in other U.S. territories) under certain federal programs in contrast to their counterparts residing on the mainland.

Strategies:

- a. Assign an Attorney Advisor with expertise to lead the project.
- b. Provide well-researched recommendations and disseminate to Congressional members and Administration officials the data and policy recommendations born out of the report.

Cross-Agency Collaborations:

- a. Collaborate across the government with Cabinet level agencies on technical review of findings and recommendations.
- b. Coordinate and meet with Cabinet level agencies regarding oversight and implementation of recommendations.

6. Develop recommendations concerning prenatal interventions to ensure any prenatal interventions do not disproportionately harm people with disabilities as a historically marginalized population.

Strategies:

- a. Assign an Attorney Advisor with expertise to lead the project.
- b. Provide well-researched recommendations and disseminate to Congressional members and Administration officials the data and policy recommendations born out of the report.

Cross-Agency Collaborations:

- a. Collaborate across the government with Cabinet level agencies on technical review of findings and recommendations.

- b. Coordinate and meet with Cabinet level agencies regarding oversight and implementation of recommendations.
7. Develop recommendations concerning independent living to ensure related policies include the needs and perspectives of people with disabilities.

Strategies:

- a. Assign an Attorney Advisor with expertise to lead the project.
- b. Provide well-researched recommendations and disseminate to Congressional members and Administration officials the data and policy recommendations born out of the report.

Cross-Agency Collaborations:

- a. Collaborate across the government with Cabinet level agencies on technical review of findings and recommendations.
- b. Coordinate and meet with Cabinet level agencies regarding oversight and implementation of recommendations.

GOAL 2: REVIEW AND ANALYZE BOTH PROPOSED AND EXISTING FEDERAL POLICIES' IMPACT ON PEOPLE WITH DISABILITIES.

OBJECTIVES:

- 1. Provide findings and recommendations regarding disaster and healthcare emergency relief planning and responses with respect to the rights of people with disabilities.

Strategies:

- a. Assign an Attorney Advisor with expertise to serve as project Lead.
- b. Examine data, current policies, and laws, and utilize methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
- c. Develop recommendations that can be drawn from the examination.
- d. The recommendations should reflect NCD's view that the disability community is heterogeneous, with diverse needs and perspectives, and those perspectives should be included.

Cross-Agency Collaborations:

- a. Collaborate with the Department of Health and Human Services and the Federal Emergency Management Agency on review of findings and recommendations.
- b. Coordinate and meet with the Department of Health and Human Services and the Federal Emergency Management Agency regarding oversight and implementation of recommendations.

2. Provide recommendations concerning proposed policies of ending health disparities.

Strategies:

- a. Assign an Attorney Advisor with expertise to serve as project Lead.
- b. Examine data, current policies, and laws, and utilize methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
- c. Develop recommendations that can be drawn from the examination.
- d. The inclusion of people with disabilities must be integral to the planning, development, and execution of this project. The recommendations should reflect NCD's view that the disability community is heterogeneous, with diverse needs and perspectives, and those perspectives should be included.

Cross-Agency Collaborations:

- a. Collaborate with the Department of Health and Human Services on review of findings and recommendations.
 - b. Coordinate and meet with the Department of Health and Human Services regarding oversight and implementation of recommendations.
3. Provide recommendations concerning proposed policies of pandemic preparedness, including access to Home and Community Based Services.

Strategies:

- a. Assign an Attorney Advisor with expertise to serve as project Lead.
- b. Examine data, current policies and laws, and utilize methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
- c. Develop recommendations that can be drawn from the examination.
- d. The recommendations should reflect NCD's view that the disability community is heterogeneous, with diverse needs and perspectives, and those perspectives should be included.

Cross-Agency Collaborations:

- a. Collaborate with the Department of Health and Human Services on review of findings and recommendations.
 - b. Coordinate and meet with the Department of Health and Human Services regarding oversight and implementation of recommendations.
4. Provide analysis and recommendations concerning economic opportunities for people with disabilities.

Strategies:

- a. Assign an Attorney Advisor with expertise to serve as project Lead.

- b. Examine data, current policies and laws, and utilize methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
- c. Develop recommendations that can be drawn from the examination.
- d. The recommendations should reflect NCD's view that the disability community is heterogeneous, with diverse needs and perspectives, and those perspectives should be included.

Cross-Agency Collaborations:

- a. Collaborate across the government with Cabinet level agencies on technical review of relevant findings and recommendations.
 - b. Coordinate and meet with Cabinet level agencies regarding oversight and implementation of relevant recommendations.
5. Provide recommendations concerning an increase in the oral health Medicaid reimbursement rate for people with intellectual and developmental disabilities as a means of saving costs long-term, and recommendations concerning incentivizing oral health care providers to participate in Medicaid.

Strategies:

- a. Assign an Attorney Advisor with expertise to work as project lead.
- b. Publish reports on these subjects and disseminate to members of Congress and relevant federal and state agencies.
- c. Provide recommendations and data to members of Congress and representatives of relevant federal and state agencies based on the examination.

Cross-Agency Collaborations:

- a. Collaborate with the U.S. Department of Health and Human Services on technical review of findings and recommendations.
 - b. Coordinate and meet with the Department of Health and Human Services regarding oversight and implementation of recommendations.
6. Provide recommendations concerning civil rights enforcement.

Strategies:

- a. Assign an Attorney Advisor with expertise to serve as project Lead.
- b. Examine data, current policies, and laws, and utilize methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
- c. Develop recommendations that can be drawn from the examination.
- d. The recommendations should reflect NCD's view that the disability community is heterogeneous, with diverse needs and perspectives, and those perspectives should be included.

Cross-Agency Collaborations:

- a. Collaborate with the U.S. Department of Justice Civil Rights Division and the U.S. Department of Health and Human Services Office of Civil Rights on technical review of findings and recommendations.
- b. Coordinate and meet with the Department of Justice and Department of Health and Human Services regarding oversight and implementation of recommendations.

GOAL 3: ENGAGE POLICYMAKERS OF BOTH THE ADMINISTRATION AND CONGRESS AND RESPOND TO THEIR REQUESTS FOR ASSISTANCE ACCURATELY AND EFFICIENTLY.

OBJECTIVES:

1. Provide timely disability policy briefings for members of the Administration and Hill staff.

Strategies:

- a. At the start of new congressional sessions, work with the House Bipartisan Disabilities Caucus to determine content for a high-level primer on disability policy, targeting staff of new members' offices.
- b. Regularly solicit feedback from congressional offices regarding ideas for content for policy briefings.
- c. Introducing the agency as their advisors, brief leadership of key Cabinet-level agencies (and their staff) regarding NCD past, current, and envisioned policy recommendations.

Cross-Agency Collaborations:

Introducing NCD as their advisors, brief leadership of key Cabinet-level agencies (and their staff) regarding NCD past, current, and envisioned policy recommendations.

2. Provide timely written briefing materials to congressional leadership and members of the Administration on policy priorities of the disability community.

Strategies:

- a. At the start of new congressional sessions, develop a high-level written primer on disability policy, targeting staff of new members' offices for distribution.
- b. Develop issue briefs for congressional and Administration leadership that contain high-level summaries of policy issues; stakeholders' views regarding the issue; applicable regulatory or guidance; and NCD's corresponding policy advice.
- c. Widely disseminate all new NCD policy reports to appropriate congressional and agency staff and offer to brief staff on the contents.
- d. When appropriate, offer specific legislative language for consideration by congressional staff in the drafting of legislation.

Cross-Agency Collaborations:

- a. Collaborate across the government with Cabinet level agencies on technical review of briefing materials as appropriate.
 - b. Coordinate and meet with Cabinet level agencies regarding oversight and implementation of NCD policy advice.
3. Increase the time NCD staff and appointed Council members dedicate to direct engagement of congressional and Administration policymakers with NCD's policy advice.

Strategies:

- a. Identify appropriate opportunities to connect Council members with members of Congress and their staff in their home states on issues that are relevant to the Council's work when Congress is in recess.
- b. Invite participation of congressional state delegations at Council meetings that take place three times a year in geographically diverse locations.

Cross-Agency Collaborations:

- a. Identify opportunities to engage with relevant staff at key agencies regarding regulations and guidance that impact the disability community; ensure that staff is aware of Council recommendations on point and arrange meetings between Council members and staff and agency representatives.
- b. Offer informational briefings and stakeholder convenings for the benefit of staff at other federal agencies.

GOAL 4: GATHER INFORMATION FROM SUBJECT MATTER EXPERTS AND MEMBERS OF THE DISABILITY COMMUNITY BOTH OF WASHINGTON, DC, AND NATIONALLY, TO HELP INFORM POLICYMAKERS' WORK.

OBJECTIVES:

- 1. Engage the disability community beyond Washington, DC and solicit their views regarding timely policy matters including but not limited to issues of health disparities, employment, and the inclusion of traditionally underserved communities.

Strategies:

- a. Leverage agency social media platforms to conduct agency "Twitter chats" on issues that are the topic of past or upcoming NCD reports.
- b. Seek national input of the disability community via a questionnaire prior to the start of every new legislative session of Congress to inform NCD's policy projects

and to bring the priorities of NCD stakeholders to the attention of policymakers in the Administration and Congress.

- c. Identify and bring members of the disability community to Washington, DC to provide testimony at congressional hearings and NCD briefings and meetings.
- d. Enhance community participation at NCD quarterly meetings.

Cross-Agency Collaborations:

- a. Convene meetings, roundtable discussions and hearings that involve key staff from other relevant agencies and stakeholders outside of D.C. either by inviting them to participate in person and facilitating their travel or by providing opportunities for input by phone or other electronic means.
- b. Schedule meetings with key staff of relevant agencies regarding NCD recommendations that is informed by regular stakeholder input as it relates to those agencies' policies, regulations and guidance.

2. Deliberate and purposeful outreach to disability communities within tribal communities.

Strategies:

- a. Assign an Attorney advisor to act as liaison with the disability community of tribal communities.
- b. Identify stakeholders within the disability community of tribal communities for coordination.

Cross-Agency Collaborations:

- a. Collaborate across the government with Cabinet level agencies on technical review of relevant findings and recommendations.
- b. Coordinate and meet with Cabinet level agencies regarding oversight and implementation of relevant recommendations.

3. Deliberate and purposeful outreach to disability communities in United States' territories.

Strategies:

- a. Assign an Attorney advisor to act as a liaison to stakeholders of the disability community within United States' territories.
- b. Identify stakeholders within the disability community of U.S. territories for coordination.

Cross-Agency Collaborations:

- a. Collaborate across the government with Cabinet level agencies on technical review of relevant findings and recommendations.

- b. Coordinate and meet with Cabinet level agencies regarding oversight and implementation of relevant recommendations.
4. Deliberate and purposeful outreach to the community of disabled veterans.

Strategies:

- a. Assign an Attorney advisor to act as a liaison to stakeholders of the community disabled veterans.
- b. Identify stakeholders within the community of disabled veterans.

Cross-Agency Collaborations:

- a. Collaborate across the government with Cabinet level agencies, including Veterans Affairs, on technical review of relevant findings and recommendations.
 - b. Coordinate and meet with Cabinet level agencies regarding oversight and implementation of relevant recommendations.
5. Provide opportunities for the disability community to provide input to policymakers on disabilities issues prior to policy decision-making.

Strategies:

- a. Leverage agency social media platforms to conduct agency “Twitter chats” on issues that are the topic of upcoming NCD reports.
- b. Seek national input of the disability community via a questionnaire prior to the start of every new legislative session of Congress to inform NCD’s policy projects and to bring the priorities of NCD stakeholders to the attention of policymakers in the Administration and Congress.
- c. Identify and bring members of the disability community to Washington, DC to provide testimony at congressional hearings and NCD briefings and meetings.
- d. Enhance community participation at NCD quarterly meetings.

Cross-Agency Collaborations:

- a. Convene meetings, roundtable discussions and hearings that involve key staff from other relevant agencies and stakeholders outside of D.C. either by inviting them to participate in person and facilitating their travel or by providing opportunities for input by phone or other electronic means.
 - b. Schedule meetings with key staff of relevant agencies regarding NCD recommendations that is informed by regular stakeholder input as it relates to those agencies’ policies, regulations and guidance.
 - c. Request staff at relevant agencies to provide technical review of NCD reports prior to their release and to comment at briefings held in conjunction with report releases on issues raised in reports that are within the purview of their agencies.
6. Develop information gathering partnerships to generate effective intelligence for policymakers to use in weighing issues.

Strategies:

- a. Enter into contracts and cooperative agreements with subject matter experts to assist NCD in preparing reports that include findings and recommendations that are timely to legislative priorities.
- b. Create advisory boards comprised of subject-matter experts to assist in shepherding NCD research on selected policy topics to help ensure the accuracy and relevance of the finished product.
- c. Encourage NCD staff and Council Members with existing areas of expertise to stay up to date in those topics by regularly engaging with other professionals with similar expertise, inside and outside of the disability community.
- d. Encourage NCD staff and Council Members to regularly attend national conferences and other fora where relevant policy discussions take place and relevant information is exchanged.

Cross-Agency Collaborations:

- a. Utilize the research of other federal agencies such as the Government Accountability Office; Congressional Research Service; and Congressional Budget Office; as well as research developed under the auspices of other agencies including the National Institute on Disability, Independent Living, and Rehabilitation Research; the Administration for Community Living; the Department of Justice; and others through grants, demonstrations and contracts.
- b. Develop and maintain relationships with staff who are subject matter experts at other agencies who can provide insight into issues that are relevant to policymakers.
- c. Regularly provide NCD input on regulations, guidance and policies of fellow federal agencies before or during public comment periods as well as on an ongoing basis.

GOAL 5: ENHANCE AGENCY OPERATIONAL AND PROGRAMMATIC INTERNAL CONTROLS TO EFFECTIVELY SERVICE EXECUTION OF STATUTORY DUTIES.

OBJECTIVES:

- 1. Enhance planning and evaluation of all agency projects to ensure continual improvements.

Strategies:

- a. Enhance planning and evaluation of all agency projects by defining the project goals, setting the objectives, analyzing alternative strategies, preparing for implementation, and designing an evaluation tool.
- b. Adopt a systematic method for collecting, analyzing, and using information to readily answer questions about projects, policies and programs, particularly about their effectiveness and efficiency.

- c. Examine outcome measures and the impact of the project to inform future agency project decisions.

Cross-Agency Collaborations:

Continue to implement standards for effective internal control from the U.S. Government Accountability Office's "Green Book" (*Standards for Internal Control in the Federal Government*)

- 2. Ensure compliance with financial regulatory and reporting requirements.

Strategies:

- a. Implement best practices by thoroughly reviewing all financial documents and processes annually.
- b. Document reasons for unusual/significant changes.
- c. Clearly document reconciliations and manual adjustments.
- d. Accounting policies will be clear and readily available to the Council and management
- e. Develop policies to prevent errors.
- f. Develop policies and procedures to detect and correct errors.

Cross-Agency Collaborations:

- a. Partner with the GSA Office of the Chief Financial Officer to ensure timely and accurate processing of all financial transactions.
- b. Partner with the GSA Office of the Chief Financial Officer to ensure compliance with all federal financial reporting requirements.

- 3. Regularly evaluate and as needed update internal policies and procedures to ensure federal compliance, improved efficiencies, and internal controls.

Strategies:

- a. Develop a process to review and update internal policies and procedures to ensure compliance with federal regulations.
- b. Disseminate new policies to new and existing employees and provide training as needed.

Cross-Agency Collaborations:

- a. Collaborate with the General Services Administration Commissions and Boards (GSACABs) and the Office of Personnel Management on technical review of policies and procedures as appropriate.
- b. Collaborate with the Office of Management and Budget's and the Government Accountability Office to ensure that the agency meets all requirements, including the determination of major programs, and compliance in areas such as internal control, sampling, and compliance auditing.

GOAL 6: RECRUIT, RETAIN, AND DEVELOP A HIGHLY QUALIFIED PROFESSIONAL STAFF IN ORDER TO EFFECTIVELY SERVICE EXECUTION OF STATUTORY DUTIES.

OBJECTIVES:

1. Engage in a human capital management assessment to evaluate staffing and consider opportunities for workforce optimization.

Strategies:

- a. Align human capital management assessment and workforce optimization efforts with the organization's mission, goals, and objectives.
- b. Management to develop a strategy for workforce optimization as needed.

Cross-Agency Collaborations:

- a. Management participates in Small Agency Groups as a resource for generating workforce optimization ideas.
- b. Coordinate across government agencies to implement workforce optimization strategy as needed.

2. Enhance new staff, members, and intern orientation materials and process.

Strategies:

- a. Supervisor will meet and escort new employee upon arrival. An alternate will be pre-arranged in case of supervisor's absence.
- b. Supervisor will meet with the new employee to discuss first day activities.
- c. The agencies' Human Resource representative will provide new employee with the administrative handbook on the first day of employment.
- d. Schedule an orientation within 10 days of employment.
- e. Ensure technical assistance is available to help new employee set up computer and access network resources.
- f. Distribute and discuss documented procedures for emergencies such as fire, tornado, etc.

Cross-Agency Collaborations:

- a. Collaborate with the Equal Employment Opportunity Commission and U.S. Department of Justice, Civil Rights Division, as needed to ensure compliance with the Americans with Disability Act.
- b. Coordinate with GSACABS on Federal orientation procedures and administering the Oath of Office.

3. Encourage staff to conduct SWOT (strengths, weaknesses, opportunities, and threats) analyses as a means of identifying professional development opportunities and enhancing performance.

Strategies:

- a. Align employee training and development efforts with the organization's mission, goals, and objectives.
- b. Supervisors develop an understanding of their employees' professional goals, strengths, and development needs.
- c. Employees take personal responsibility and accountability for their career development, acquiring or enhancing the skills they need to stay current in their roles.

Cross-Agency Collaborations:

- a. Management participates in Small Agency Groups as a resource for training opportunities.
- b. Coordinate across the government to obtain training opportunities.

MAJOR MANAGEMENT PRIORITIES AND CHALLENGES

NCD is proud to present this four-year strategic plan – NCD endeavored to be more pointed in content, opting to clearly define the areas of priority for allocation of agency resources.

Many of NCD's areas of challenge and risk are related to its micro size. One of the obvious challenges is how best to allocate our agency's limited financial and human resources. With the resources provided, NCD is limited in its engagement, policy development, and collaborative activities, having to balance and prioritize stakeholder needs and priorities with available resources.

NCD's appropriations have been flat-lined or slightly increased over the last several fiscal years, relative to rising costs of operations. Most Council members balance their service on NCD with full-time careers and embrace the breadth of NCD's mission even while acknowledging that difficult choices must be made about priorities. NCD's risk response to these challenges has been one of reduction, having assumed greater amounts of policy work in-house versus by contract; and having filled staff vacancies with employees at lower GS levels than predecessors.

Although NCD's statutory authority is limited to advising, the agency's duties are extensive and belie the agency's limited financial and human resources. With an annual appropriation of approximately \$3,350,000, NCD supports a mission of gathering information and reviewing and evaluating on a continuing basis all policies, programs, practices, and procedures concerning individuals with disabilities conducted or assisted by federal departments and agencies and all

statutes and regulations pertaining to federal programs which assist such individuals with disabilities.

Although the constraints of our limited resources are a challenge, NCD has persisted over its nearly forty years in annually offering numerous quality policy reports and briefs as well as engaging policymakers and convening members of the disability community for the benefit of policy development. Management's priority is to continue doing so.

EVIDENCE BUILDING

NCD relied upon its authorizing statute to translate agency duties into strategic goals in the instance of goals 1 through 4 and applied operational and human capital considerations to develop goals 5 and 6.

NCD drew upon a diverse evidence base in determining objectives for each strategic goal.

NCD will continue to rely upon environmental scans of congressional and Administration priorities, national trends, and surveys of the disability community to determine appropriate updated objectives for each strategic review of the agency's planned work.

NCD developed the objectives to strategic goals 1-4 in consideration of written and verbal feedback received by NCD stakeholders, in light of activities intended to inform and dispense the advice NCD is charged with providing policymakers.

NCD developed the objectives to strategic goals 5 and 6 and identified enhanced project planning and evaluation as management priorities in consideration of the results of past Federal Employee Viewpoint Survey results; internal risk assessment results; a GAO training on internal controls; and the recommendations received during the annual financial audits.

NCD intends to utilize project management trainings, community surveys, national data, and regular communication with stakeholders to further build NCD's evidence base throughout the FY22-FY26 time-period to inform updates to the strategic plan each year.