Comments on Results-Oriented Accountability for Grants– Document Citation 83 FR 57751

Submitted to www.grantsfeedback.cfo.gov
Attn: Jeannette M. Mandycz, Office of Federal Financial Management, OMB

January 14, 2019

President's Management Agenda (PMA). The PMA established a Cross-Agency Priority (CAP) goal titled: "Results-Oriented Accountability for Grants". This notice is meant to notify the public of the opportunity to provide input on proposed grants management common data standards that have been created in support of the Results-Oriented Accountability for Grants CAP goal.

The Association of Assistive Technology Act Programs (ATAP) is pleased to provide the following comments to the Office of Management and Budget (OMB) regarding the review and consideration of the proposed grants management common data standards that have been created in support of the Results-Oriented Accountability for Grants Cross-Agency Priority (CAP) goal established by the President's Management Agenda (PMA). ATAP represents 54 State Assistive Technology Programs and is pleased to provide comments on the proposed revision and renewal of this critical data reporting instrument.

ATAP recommends that all Federal grant opportunities incorporate clarifying language of the grantees obligations to all entities covered by Titles II and III of the Americans with Disabilities Act (ADA) and Section 508 of the Rehabilitation Act. These current enacted laws, obligate grantees to make websites, online content, online systems and other forms of information and communication technology (ICT) accessible to and usable by individuals with disabilities. This could include virtual schools, digital content created by local education agencies (LEAs), technical assistance providers for various federal programs, or any website development outsourced for federal entities. These are just several examples of where such language is necessary in request for proposals and other grant competitions.

ATAP suggests that all grants reference a national set of accessibility standards, such as either Section 508 or Web Content Accessibility Guidelines 2.0, Level AA, for grantees to utilize in order to ensure full interoperability and accessibility for individuals with disabilities.

ATAP appreciates the opportunity to provide these comments on behalf of our 54 State AT Program members. Also, ATAP would be happy to work with OMB on the appropriate language to include in the proposed grants management common data standards. Please feel free to contact Audrey Busch, ATAP's Executive Director, at 202.344.5674 or audrey.busch@ataporg.org with any questions.

Sincerely,

Audrey Busch
Executive Director
ATAP