National council on disability

strategic plan

FY 2018 – FY 2022

# 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 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 million.

## 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 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 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 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 agency listserv; 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 allotting time at its August 2017 quarterly meeting to receive public comment in person or by phone, in addition to requesting public input via email, as well. These opportunities were advertised over the NCD email listserv, which is disseminated to 2,420 subscribers; NCD’s Facebook account, which is followed by over 30,000 people; NCD’s Twitter account, which is followed by over 11,000 people; posting the opportunity to the agency website; and posting it in the Federal Register.

NCD received responses to the solicitation for input that were largely directed at recommending specific policy topics on which the agency should focus. One commenter recommended increasing representation of specific impacted populations within NCD’s development of policy recommendations. In addition to comments received directly in response to the strategic plan prompt, 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 brought copies of the agency’s draft strategic framework for FY18 – FY22 to staff of the House and Senate authorizing committees for review and feedback. Staff feedback was positive with only minor suggestions regarding the wording of two objectives underneath the second strategic goal, which NCD incorporated into its final version.

# 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 that are 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 framework that follows below 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 associated with each objective and identification of cross-agency collaborations associated with objectives’ strategies.

## VISION STATEMENT

The vision of the National Council on Disability (NCD) is to advance the goals of the Americans with Disabilities Act (ADA) through recommendations regarding federal policy.

## 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, such as for entitlement reform discussions.
2. Review and analyze proposed and existing federal policies’ impact on people with disabilities.
3. Engage policymakers and respond to their requests for assistance accurately, efficiently and impartially.
4. Gather information from subject matter experts and members of the disability community to help inform policymakers’ work.
5. Enhance agency operational and programmatic internal controls in order 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, such as FOR entitlement reform discussions.**

### Objectives:

1. Develop materials regarding findings on the impact of charter schools and school vouchers on students with disabilities and offer recommendations to policymakers.
2. Develop materials regarding the use and impact of guardianship on national disability policy goals; federal court jurisdiction regarding guardianship cases; and the ways guardianship uniquely affects the lives of people with intellectual and developmental disabilities, and offer recommendations to policymakers.
3. Provide policymakers NCD’s Medicaid policy findings and recommendations during healthcare reform discussions.
4. Provide policymakers NCD’s Social Security policy findings and recommendations during Social Security reform discussions.
5. Develop materials and recommendations regarding findings of research on the involuntary institutionalization of people with disabilities as a result of disasters.
6. Develop materials and recommendations regarding findings of research on bioethical issues affecting people with disabilities.
7. Develop materials and recommendations regarding the creation of a centralized accommodations fund for the Federal Government.

## **Goal 2: Review and analyze proposed and existing federal policies’ impact on people with disabilities.**

### Objectives:

1. Provide findings and recommendations regarding the implementation of the Workforce Innovation and Opportunity Act’s requirement to provide pre-employment transition services to transition-age students with disabilities.
2. Provide recommendations regarding the implementation of the Individuals with Disabilities Education Act and the Higher Education Act if Congress pursues reauthorization efforts.
3. Recommend improvements to the efficiency, effectiveness, and coordination of existing federal disability programs and offices.
4. Develop materials and recommendations regarding findings of research on the use of subminimum wages in for-profit supply chains and highlight best practices used by providers that transitioned away from the use of subminimum wages.

## **Goal 3: Engage policymakers and respond to their requests for assistance accurately and efficiently and impartially.**

### Objectives:

1. Provide regular disability policy briefings for members of the Administration and Hill staff.
2. Regularly provide congressional leadership and members of the Administration written briefing materials on policy priorities of the disability community.
3. Increase time of NCD staff and appointed Council members spent in direct engagement of congressional and Administration policymakers with NCD’s policy advice; and/or of radio, television, print, and online media regarding topics NCD has engaged.

## **Goal 4: Gather information from subject matter experts and members of the disability community to help inform policymakers’ work.**

### Objectives:

1. Engage the disability community beyond Washington, DC, soliciting their views regarding timely policy matters and providing the input of the disability community for policymakers to weigh in their decision making.
2. Develop information partnerships with subject matter experts inside and outside the disability community to generate effective intelligence for policymakers to use in weighing issues.

## **Goal 5: Enhance agency operational and programmatic internal controls in order to effectively service execution of statutory duties.**

### Objectives:

1. Evaluate and update agency IT infrastructure.
2. Enhance planning and evaluation of all agency projects to ensure continual improvements.
3. Ensure compliance with financial regulatory and reporting requirements.
4. Update all agency internal policies and procedures.

## **Goal 6: Recruit, retain, and develop a highly qualified professional staff in order to effectively service execution of statutory duties.**

### Objectives:

1. Enhance new staff orientation materials and process.
2. Perform a SWOT analysis and identify best practices from select agency projects from the prior fiscal year.
3. Identify training to support improvement in areas identified as weaknesses or signifying skills gaps by project analysis.

# Detailed view of strategic GOALS & OBJECTIVES

## **Goal 1: develop new disability policy recommendations, such as FOR entitlement reform discussions.**

**Overview of Goal:**

NCD’s strategic goal of developing new policy recommendations, such as for entitlement reform, addresses some of federal policymakers’ greatest challenges in the next five years pertaining to the country’s fiscal health, as well as provides critical insights to newly emerging policy trends.

Improving and modernizing federal disability benefits programs continues to remain on the U.S. Government Accountability Office (GAO)’s “High Risk” list.[[1]](#footnote-1) The Social Security Board of Trustees 2017 report stated that under current projections, the disability insurance trust fund is projected to be insolvent by 2028.[[2]](#footnote-2) And GAO’s Federal Fiscal Outlook notes that federal increases in spending are driven in large part to an aging population and rising health care costs, and that such increases are not sustainable over the long-term.[[3]](#footnote-3)

Against the backdrop of these challenges, NCD has nearly 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 time. 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 longstanding problems.

NCD’s body of work has the opportunity for meaningful application to regulatory and legislative discussions regarding new and emerging policy trends, as well, such as those of school choice and the use of guardianships, particularly in the instance of aging parents.

### **Objectives:**

1. Develop materials regarding findings on the impact of charter schools and school vouchers on students with disabilities and offer recommendations to policymakers.

**Overview of Objective:** NCD determined the appropriateness of this objective in view of the nationwide prevalence of and the current Administration’s commitment to school choice and charter schools. As of 2017, 42 states and the District of Columbia have enacted laws that allow charter schools, and 27 states and the District of Columbia have enacted school choice initiatives that incentivize parents to send their children to private schools rather than public schools.[[4]](#footnote-4) 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, and in the private sector, including… school reform efforts and the impact of such efforts on individuals with disabilities...”[[5]](#footnote-5)

**Performance Goal:** Develop and release a policy report with key findings and recommendations to policymakers in the 1st quarter of FY19. Performance indicators include development of a scope of work, notice of the funding opportunity, review and selection of a suitable research partner and entering into a cooperative agreement with them; conducting research; holding a vote of the Council on the final draft of the policy report; and ultimately publishing the report and advising policymakers based on its content.

1. Develop materials regarding the use and impact of guardianship on national disability policy goals; federal court jurisdiction regarding guardianship cases; and the ways guardianship uniquely affects the lives of people with intellectual and developmental disabilities, and offer recommendations to policymakers.

**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];”[[6]](#footnote-6) in view of the importance of an individual’s denial of rights under guardianship; recent congressional interest in and hearings[[7]](#footnote-7) regarding the financial abuse of the elderly by guardians and others in a fiduciary position of trust who misuse their position for personal gain; and the applicability of the of the report’s findings and recommendations not only to people with disabilities but also a burgeoning older population, with figures projected at greater than 20 percent of U.S. residents aged 65 and over by 2030.[[8]](#footnote-8)

**Performance Goal:** Develop and release an initial guardianship policy report with key findings and recommendations to policymakers by 2nd quarter of FY18. Develop and release an issue brief regarding federal court jurisdiction of guardianship cases by 2nd quarter of FY19. Develop and release a policy report regarding the ways guardianship uniquely affects the lives of people with intellectual and developmental disabilities with key findings and recommendations to policymakers by 4th quarter of FY19 Performance indicators include development of three scopes of work, notices of the funding opportunities, review and selection of suitable research partners for each, and entering into three distinct cooperative agreements with them; conducting research; holding three votes of the Council on the final drafts of both reports and the issue brief; and ultimately publishing the reports and brief and advising policymakers based on their content.

1. Provide policymakers NCD’s Medicaid policy findings and recommendations during healthcare reform discussions.

**Overview of Objective:** NCD determined the appropriateness of this objective in view of the essential role that Medicaid plays in provision of home- and community-based services to people with disabilities, in furtherance of the goals of the ADA;

given that Medicaid is the primary payer for long-term services and supports for people with disabilities; given congressional interest in considerable changes to the administration of the Medicaid program, including in per capita caps and in block granting; given the President’s interest in “reforming Medicaid” as proposed in the President’s FY18 Budget; and given 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, including…access to personal assistance services…[and] access to health care...”[[9]](#footnote-9)

**Performance Goal:** Beginning 4th quarter of FY17 and completed no later than 1st quarter of FY18, gather and package NCD’s last five years’ of reports on Medicaid and home-and-community-based services and develop and provide principles for public and private health care reform to policymakers on the committees of jurisdiction for health care reform proposals, as well as to newly appointed leaders of the U.S. Department of Health and Human Services (HHS). Performance indicators include documented requests to meet with congressional policymakers and HHS leadership regarding the collection of germane policy advice and scheduled meetings, when possible.

1. Provide policymakers NCD’s Social Security policy findings and recommendations during Social Security reform discussions.

**Overview of Objective:** NCD determined the appropriateness of this objective in view of the linkages between receipt of SSDI or SSI benefits and the employment of people with disabilities, in furtherance of the goals of the ADA; the Social Security and Medicare Board of Trustees’ projections that the tThe Old-Age and Survivors Insurance (OASI) Trust Fund, which pays retirement and survivors benefits, and the Disability Insurance (DI) Trust Fundttthe Old-Age and Survivors Insurance (OASI) Trust Fund and the Disability Insurance (DI) Trust Fund will be depleted in 2034;[[10]](#footnote-10) congressional interest in addressing entitlement reforms; and 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, including …policies that operate as disincentives for the individuals to seek and retain employment.”[[11]](#footnote-11)

**Performance Goal:** By 1st quarter FY19, offer one House-side and one Senate-side policy briefing regarding NCD’s 2015 “Securing the Social Contract: Reforming Social Security Disability” report. Performance indicators include documented offers to staff of committees of jurisdiction of such briefings, as well as scheduled, advertised, and well-attended briefings.

1. Develop materials and recommendations regarding findings of research on the involuntary institutionalization of people with disabilities as a result of disasters.  
     
   **Overview of Objective**: NCD determined the appropriateness of this objective because of ongoing concerns about disaster response plans that do not include protocols to 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 has passed.

**Performance Goal:** By 3rd quarter FY19, develop and release a policy report with key findings and recommendations to policymakers.

1. Develop materials and recommendations regarding findings of research on bioethical issues affecting people with disabilities.

**Overview of Objective:** NCD determined the appropriateness of this objective based on advancing the goals of the Americans with Disabilities Act by promoting policies, programs, practices, and procedures that guarantee equal opportunity for individuals with disabilities; congressional interest in addressing discrimination in organ transplants; and 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…including access to health care….”

**Performance Goal:** Develop and release a series of five policy reports with key findings and recommendations to policymakers by 3rd quarter of FY19. Report topics are: organ transplants; medical futility; genetic testing for fetal disability; Quality Adjusted Life Years Analysis (QALYS), and physician assisted suicide. Performance indicators include development of a scope of work, notice of the funding opportunity, review and selection of a suitable research partner and entering into a cooperative agreement with them; conducting research; holding a vote of the Council on the final draft of the policy report; and ultimately publishing the report and advising policymakers based on its content.

1. Develop materials and recommendations regarding the creation of a centralized accommodations fund for the Federal Government.

**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.” Reasonable accommodations are often critical to obtaining and retaining employment for people with disabilities. Over the years, NCD has urged that the federal government improve its reasonable accommodation process and budgeting, and has posited that centralized accommodations funds are an efficient means to provide reasonable accommodations while avoiding charges to individual office and department budgets. NCD determined it appropriate to examine existing centralized reasonable accommodation and the feasibility of such a fund for federal employees.

**Performance Goal:** Develop and release a policy brief with key findings and recommendations to policymakers by 2nd quarter of FY19. Performance indicators include development of a scope of work; development and dissemination of a questionnaire to federal agencies regarding their funding practices for accommodations; noting key findings and drafting policy recommendations; holding a vote of the Council on the final draft of the policy report; and ultimately publishing the report and advising policymakers based on its content.**The Trustees project that the combined trust funds will be depleted in 2034, the same year projected in last year's report. The projected 75-year actuarial deficit for the OASDI Trust Funds is 2.83 percent of taxable payroll, up from 2.66 percent projected in last year's report. This deficit amounts to 1 percent of GDP over the 75-year time period**

## **Goal 2: Review and analyze 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 that NCD’s duties include 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;”[[12]](#footnote-12) 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 56 million Americans with disabilities or specific subpopulations’ concerns.

Finally, Executive Order 13781 of March 2017 states the interest of the Administration to “improve the efficiency, effectiveness, and accountability of the executive branch,”[[13]](#footnote-13) and NCD review and analysis of federal agencies’ policies and programs pertaining to people with disabilities is consistent with these aims.

### Objectives:

1. Provide findings and recommendations regarding the implementation of the Workforce Innovation and Opportunity Act (WIOA)’s requirement to provide pre-employment transition services to transition-age students with disabilities.

**Overview of Objective:** NCD determined the appropriateness of this objective in view of NCD’s statutory duties, which include to “(2)  provide advice to the Commissioner with respect to the policies of and conduct of the Rehabilitation Services Administration;” and to “(3) advise the President, the Congress, the Commissioner, the appropriate Assistant Secretary of the Department of Education, and the Director of the National Institute on Disability, Independent Living, and Rehabilitation Research on the development of the programs to be carried out under this Act” (“this Act” being the Rehabilitation Services Act, which WIOA amended); and 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.”[[14]](#footnote-14) NCD also determined the appropriateness of this objective in light of the persistently high unemployment rates of people with disabilities compared to people without disabilities.

**Performance Goal:** Develop and release a policy report with key findings and recommendations to policymakers by 2nd quarter FY18. Performance indicators include development of a scope of work; development and dissemination of a questionnaire for state Vocational Rehabilitation offices; synthesizing responses to the questionnaire; noting key findings and drafting policy recommendations; holding a vote of the Council on the final draft of the policy report; and ultimately publishing the report and advising policymakers based on its content.

1. Provide recommendations regarding the implementation of the Individuals with Disabilities Education Act (IDEA) and the Higher Education Act (HEA) if Congress pursues reauthorization efforts.

**Overview of Objective:** NCD determined the appropriateness of this objective 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, and in the private sector, including… school reform efforts and the impact of such efforts on individuals with disabilities...”[[15]](#footnote-15)

**Performance Goal:** By 1st quarter FY18, develop a short series of research briefs no longer than 25 pages long each on IDEA on the topics of monitoring and enforcement; IDEA funding; English Language Learners and IDEA; educational segregation; and IDEA and Every Student Succeeds Act (ESSA). By 3rd quarter of FY18, identify areas of HEA that require further examination as it pertains to students with disabilities, and determine timeliness of a fulsome research activity versus an in-house research brief. Performance indicators include development of a scope of work, notice of the funding opportunity, review and selection of a suitable research partner and entering into a cooperative agreement with them; conducting research; holding a vote of the Council on the final draft of the policy report; and ultimately publishing the research briefs and advising policymakers based on its content.

1. Recommend improvements to the efficiency, effectiveness, and coordination of existing federal disability programs and offices.

**Overview of Objective:** NCD determined the appropriateness of this objective in view of Executive Order 13781 of March 2017, which states the interest of the Administration to “improve the efficiency, effectiveness, and accountability of the executive branch;”[[16]](#footnote-16) and GAO’s 2017 “High Risk List,” which retains “Improving and Modernizing Federal Disability Programs” as a key issue for policymakers, identifying these programs as most in need of transformation.[[17]](#footnote-17)

**Performance Goal:** In FY20, develop and release a policy report to policymakers that outlines specific ways in which federal disability programs can be better coordinated; linked or delinked with one another; and updated to better align with contemporary policy goals for Americans with disabilities. Performance indicators include development of a scope of work and a research methodology; collection and synthesis of research; meetings with key federal stakeholders; development of key findings and drafting policy recommendations; holding a vote of the Council on the final draft of the policy report; and ultimately publishing the report and advising policymakers based on its content.

1. Develop materials and recommendations regarding findings of research on the use of subminimum wages in for-profit supply chains and highlight best practices used by providers that transitioned away from the use of subminimum wage.

**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.”[[18]](#footnote-18) 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 a policy report with key findings and recommendations to policymakers by 1st quarter FY19. Performance indicators include development of a scope of work; notice of the funding opportunity, review and selection of a suitable research partner and entering into a cooperative agreement with them; conducting research; holding a vote of the Council on the final draft of the policy report; and ultimately publishing the report and advising policymakers based on its content.

## **Goal 3: Engage policymakers and respond to their requests for assistance accurately and efficiently and impartially.**

**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 of 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 regular 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.”[[19]](#footnote-19)

**Performance Goal:** In line with specific requests of committee and Member offices regarding content, provide at least two congressional briefings a year utilizing NCD research. Additionally, by the end of March 2019 and again by the end of March 2021, provide a high-level primer in the form of a Hill briefing on the policy areas of greatest priority for the disability community, targeting staff of new members’ offices.

1. Regularly provide congressional leadership and members of the Administration written briefing materials on policy priorities of the disability community.

**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.”[[20]](#footnote-20)

**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. Additionally, by the end of March 2019 and again by the end of March 2021, NCD will provide a high-level written primer to offer at a Hill briefing on the policy areas of greatest priority for the disability community, targeting staff of new members’ offices.

1. Increase time of NCD staff and appointed Council members spent in direct engagement of congressional and Administration policymakers with NCD’s policy advice; and/or of radio, television, print, and online media regarding topics NCD has engaged.

**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.”[[21]](#footnote-21)

**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. By 1st quarter FY19, NCD staff will provide media training to the full Council to prepare them for future interactions.

## **Goal 4: gather information from subject matter experts and members of the disability community 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 Americans affected by the problems policymakers seek to solve or 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 Hurricane Katrina warnings and response. Without a complete understanding of the lived experiences of people with disabilities, emergency warnings were often inaccessible. 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 Katrina 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, soliciting their views regarding timely policy matters and providing the input of the disability community for policymakers to weigh in their 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.).”[[22]](#footnote-22)

**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 “(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]. [[23]](#footnote-23)

**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.

1. Develop information partnerships with subject matter experts inside and outside the disability community 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]. [[24]](#footnote-24)

**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 in order to effectively service execution of statutory duties.**

### Objectives:

1. Evaluate and update agency information technology (IT) infrastructure.

**Overview of Objective:** NCD determined the appropriateness of this objective in view of a capital resource management audit; the May 2017 Executive Order on Strengthening the Cybersecurity of Federal Networks and Critical Infrastructure;[[25]](#footnote-25) and the U.S. Department of Homeland Security’s new EINSTEIN cybersecurity requirements[[26]](#footnote-26) on federal agencies.

**Performance Goals:** By the 1st quarter of FY18, NCD will update its agency IT hardware and software. By 4th quarter FY18, NCD will adopt and train on new agency cybersecurity protocols.

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)[[27]](#footnote-27) 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:** NCD will provide staff training on project management principles by the 2nd quarter of FY19. Each fiscal year, NCD will formally evaluate select projects following their completion and identify any lessons learned and discuss any work flow 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.

1. 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:** Beginning in FY18, 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.

1. Update all agency internal policies and procedures.

**Overview of Objective:** NCD determined the appropriateness of this objective in view of maintaining compliance with OPM regulations and minimizing liability to the agency.

**Performance Goals:** By the 1st quarter of FY19, NCD will review and revise the agency administrative manual. No later than by 4th quarter of FY20, NCD will complete desk manuals for all NCD staff.

## **Goal 6: Recruit, retain, and develop a highly qualified professional staff in order to effectively service execution of statutory duties.**

### Objectives:

1. Enhance new staff orientation materials and process.

**Overview of Objective:** NCD determined the appropriateness of this objective in view of a relatively new staff and the anticipated onboarding of several additional new staff in the next fiscal year.

**Performance Goals:** By the end of 1st quarter FY18, 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.

1. Perform a SWOT analysis and identify best practices from select agency projects from the prior fiscal year.
2. Identify professional development opportunities to support improvement in areas identified as weaknesses or signifying skills gaps by project analysis.

**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 3rd quarter FY18, 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, such as FOR entitlement reform discussions.**

### Objectives:

1. Develop materials regarding findings on the impact of charter schools and school vouchers on students with disabilities and offer recommendations to policymakers.

**Strategies:**

* 1. Assign an Attorney Advisor with expertise to work via cooperative agreement.
  2. Develop a detailed preliminary framing paper and outline.
  3. Develop an initial draft of the report using research methodologies selected during development of the scope of work.
  4. Utilize only methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
  5. Develop a final draft of the report which will incorporate the findings, conclusions, and recommendations that can be drawn from the examination and incorporating recommended revisions derived from NCD staff, Council members, and external peer reviews.
  6. Develop a 2-3 page “Report Highlights” document, which succinctly and in plain language encapsulates the report’s scope and purpose, major findings, and recommendations.
  7. The inclusion of people with disabilities must be integral to the planning, development, and execution of this project. The report 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:**

1. Collaborate with the Department of Education on technical review of findings and recommendations.
2. Coordinate and meet with the Department of Education regarding oversight and implementation of recommendations.
3. Meet with Education Secretary and staff regarding any proposed regulation or legislation under consideration for repeal/replace/modify in the agency’s reform plan with connection to NCD recommendations.
4. Develop materials regarding the use and impact of guardianship on national disability policy goals; federal court jurisdiction regarding guardianship cases; and the ways guardianship uniquely affects the lives of people with intellectual and developmental disabilities, and offer recommendations to policymakers.

**Strategies:**

* 1. Assign Legislative Affairs Specialist with subject matter expertise to work cooperative agreements.
  2. Develop detailed preliminary framing papers and outlines.
  3. Develop an initial drafts of the reports and issue brief using research methodologies selected during development of the scopes of work.
  4. Utilize only methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
  5. Develop final drafts of the reports and issue brief which will incorporate the findings, conclusions, and recommendations that can be drawn from the examination and incorporating recommended revisions derived from NCD staff, Council members, and external peer reviews.
  6. Develop a 2-3 page “Report Highlights” document for each report, which succinctly and in plain language encapsulates the report’s scope and purpose, major findings, and recommendations.
  7. The inclusion of people with disabilities must be integral to the planning, development, and execution of these three distinct projects. The reports and issue brief 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:**

1. Collaborate with the Administration for Community Living (ACL) on technical review of findings and recommendations.
2. Coordinate and meet with ACL regarding oversight and implementation of recommendations.
3. Coordinate and meet with the U.S. Department of Education, including the Office of Special Education and Rehabilitation Services, regarding oversight and implementation of recommendations.
4. Provide policymakers NCD’s Medicaid policy findings and recommendations during healthcare reform discussions.

**Strategies:**

* 1. Assign Legislative Affairs Specialist project of summarizing key NCD policy findings in the form of guiding principles; and analyzing legislative drafts.
  2. Develop letters to committees of jurisdiction and congressional leadership regarding guiding principles for healthcare reform based on past NCD reports.
  3. Develop letters to committees of jurisdiction and congressional leadership regarding any concerns or recommendations in response to legislative drafts.
  4. Offer to brief individual offices and committees of jurisdiction on the content of NCD’s healthcare recommendations.

**Cross-Agency Collaborations:**

1. Coordinate and meet with CMS Administrator and HHS Secretary and staff regarding any proposed regulation or legislation under consideration for repeal/replace/modify in the agency’s reform plan related to NCD recommendations.
2. Provide policymakers NCD’s Social Security policy findings and recommendations during Social Security reform discussions.

**Strategies:**

* 1. Assign Legislative Affairs Specialist project of summarizing key NCD policy findings; briefing on NCD research; and analyzing any legislative drafts.
  2. Develop letters to committees of jurisdiction and congressional leadership regarding NCD recommendations.
  3. Develop letters to committees of jurisdiction and congressional leadership regarding any concerns or recommendations in response to legislative drafts.
  4. Offer to brief individual offices and committees of jurisdiction on the content of NCD’s recommendations.

**Cross-Agency Collaborations:**

1. Coordinate and meet with CMS Administrator and HHS Secretary and staff regarding any proposed regulation or legislation under consideration for repeal/replace/modify in the agency’s reform plan related to NCD recommendations.
2. Develop materials and recommendations regarding findings of research on the involuntary institutionalization of people with disabilities as a result of disasters.

**Strategies:**

* 1. Assign an Attorney Advisor with expertise to work via cooperative agreement.
  2. Develop a detailed preliminary framing paper and outline.
  3. Develop an initial draft of the report using research methodologies selected during development of the scope of work.
  4. Utilize only methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
  5. Develop a final draft of the report which will incorporate the findings, conclusions, and recommendations that can be drawn from the examination and incorporating recommended revisions derived from NCD staff, Council members, and external peer reviews.
  6. Develop a 2-3 page “Report Highlights” document, which succinctly and in plain language encapsulates the report’s scope and purpose, major findings, and recommendations.
  7. The inclusion of people with disabilities must be integral to the planning, development, and execution of this project. The report 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:**

1. Collaborate with the Federal Emergency Management Agency (FEMA) and the U.S. Department of Health and Human Services (HHS) on technical review of findings and recommendations.
2. Coordinate and meet with FEMA and HHS regarding oversight and implementation of recommendations.
3. Develop materials and recommendations regarding findings of research on bioethical issues affecting people with disabilities.

**Strategies:**

* 1. Assign an Attorney Advisor with expertise to work via cooperative agreement.
  2. Develop a detailed preliminary framing paper and outline.
  3. Develop an initial draft of the report using research methodologies selected during development of the scope of work.
  4. Utilize only methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
  5. Develop a final draft of the report which will incorporate the findings, conclusions, and recommendations that can be drawn from the examination and incorporating recommended revisions derived from NCD staff, Council members, and external peer reviews.
  6. Develop a 2-3 page “Report Highlights” document, which succinctly and in plain language encapsulates the report’s scope and purpose, major findings, and recommendations.
  7. The inclusion of people with disabilities must be integral to the planning, development, and execution of this project. The report 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:**

1. Collaborate with the U.S. Department of Health and Human Services (HHS), including the Administration on Community Living (ACL) on technical review of findings and recommendations.
2. Coordinate and meet with HHS and ACL regarding oversight and implementation of recommendations.
3. Develop materials and recommendations regarding the creation of a centralized accommodations fund for the Federal Government.

**Strategies:**

* 1. Assign an Attorney Advisor with expertise to develop an outline and brief.
  2. Develop an initial draft of the report using research methodologies selected during development of the scope of work.
  3. Develop a final draft of the brief which will incorporate the findings, conclusions, and recommendations that can be drawn from the examination and incorporating recommended revisions derived from NCD staff, Council members, and external peer reviews.

**Cross-Agency Collaborations:**

1. Collaborate with select federal agencies on technical review of findings and recommendations.
2. Coordinate and meet with select federal agencies regarding implementation of recommendations.
3. Meet with select federal agencies and staff regarding any proposed regulation or legislation under consideration for repeal/replace/modify in the agency’s reform plan with connection to NCD recommendations.

## **Goal 2: Review and analyze proposed and existing federal policies’ impact on people with disabilities.**

### Objectives:

1. Provide findings and recommendations regarding the implementation of the Workforce Innovation and Opportunity Act’s requirement to provide pre-employment transition services to transition-age students with disabilities.

**Strategies:**

* 1. Assign an Attorney Advisor with expertise to work via cooperative agreement.
  2. Develop a detailed preliminary framing paper and outline.
  3. Develop an initial draft of the report using research methodologies selected during development of the scope of work.
  4. Utilize only methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
  5. Develop a final draft of the report which will incorporate the findings, conclusions, and recommendations that can be drawn from the examination and incorporating recommended revisions derived from NCD staff, Council members, and external peer reviews.
  6. Develop a 2-3 page “Report Highlights” document, which succinctly and in plain language encapsulates the report’s scope and purpose, major findings, and recommendations.
  7. The inclusion of people with disabilities must be integral to the planning, development, and execution of this project. The report 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:**

1. Collaborate with the Rehabilitation Services Administration (RSA) on technical review of findings and recommendations.
2. Coordinate and meet with RSA / ED regarding oversight and implementation of recommendations.
3. Provide recommendations regarding the implementation of the Individuals with Disabilities Education Act and the Higher Education Act if Congress pursues reauthorization efforts.

**Strategies:**

* 1. Assign an Attorney Advisor with expertise to work via cooperative agreement.
  2. Develop a detailed preliminary framing paper and outline.
  3. Develop an initial draft of the report using research methodologies selected during development of the scope of work.
  4. Utilize only methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
  5. Develop a final draft of the report which will incorporate the findings, conclusions, and recommendations that can be drawn from the examination and incorporating recommended revisions derived from NCD staff, Council members, and external peer reviews.
  6. Develop a 2-3 page “Report Highlights” document, which succinctly and in plain language encapsulates the report series’ scope and purpose, major findings, and recommendations.
  7. The inclusion of people with disabilities must be integral to the planning, development, and execution of this project. The report 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:**

1. Collaborate with the Department of Education on technical review of findings and recommendations.
2. Coordinate and meet with the Department of Education regarding oversight and implementation of recommendations.
3. Recommend improvements to the efficiency, effectiveness, and coordination of existing federal disability programs and offices.

**Strategies:**

* 1. Assign an Attorney Advisor with expertise to work via cooperative agreement.
  2. Develop a detailed preliminary framing paper and outline.
  3. Develop an initial draft of the report using research methodologies selected during development of the scope of work.
  4. Utilize only methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
  5. Develop a final draft of the report which will incorporate the findings, conclusions, and recommendations that can be drawn from the examination and incorporating recommended revisions derived from NCD staff, Council members, and external peer reviews.
  6. Develop a 2-3 page “Report Highlights” document, which succinctly and in plain language encapsulates the report’s scope and purpose, major findings, and recommendations.
  7. The inclusion of people with disabilities must be integral to the planning, development, and execution of this project. The report 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:**

1. Collaborate across the government with Cabinet level agencies on technical review of findings and recommendations.
2. Coordinate and meet with Cabinet level agencies regarding oversight and implementation of recommendations.
3. Develop materials and recommendations regarding findings of research on the use of subminimum wages in for-profit supply chains and highlight best practices used by providers that transitioned away from the use of subminimum wage.

**Strategies:**

* 1. Assign an Attorney Advisor with expertise to work via cooperative agreement.
  2. Develop a detailed preliminary framing paper and outline.
  3. Develop an initial draft of the report using research methodologies selected during development of the scope of work.
  4. Utilize only methodologies to obtain stakeholder input that allow for open-ended discussions between stakeholders, as opposed to soliciting answers to specific, predetermined questions.
  5. Develop a final draft of the report which will incorporate the findings, conclusions, and recommendations that can be drawn from the examination and incorporating recommended revisions derived from NCD staff, Council members, and external peer reviews.
  6. Develop a 2-3 page “Report Highlights” document, which succinctly and in plain language encapsulates the report’s scope and purpose, major findings, and recommendations.
  7. The inclusion of people with disabilities must be integral to the planning, development, and execution of this project. The report 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:**

1. Collaborate with the U.S. Department of Labor (DOL) on technical review of findings and recommendations.
2. Coordinate and meet with DOL regarding oversight and implementation of recommendations.

## **Goal 3: Engage policymakers and respond to their requests for assistance accurately and efficiently and impartially.**

### Objectives:

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

**Strategies:**

* 1. 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.
  2. Regularly solicit feedback from congressional offices regarding ideas for content for policy briefings.
  3. Introducing the agency as their advisors, offer to brief newly appointed leadership of key Cabinet-level agencies (and their staff) regarding NCD past, current, and envisioned policy recommendations.

**Cross-Agency Collaborations:**

1. Introducing the agency as their advisors, offer to brief newly appointed leadership of key Cabinet-level agencies (and their staff) regarding NCD past, current, and envisioned policy recommendations.
2. Regularly provide congressional leadership and members of the Administration written briefing materials on policy priorities of the disability community.

**Strategies:**

* 1. At the start of new congressional sessions, develop a high-level written primer on disability policy, targeting staff of new members’ offices for distribution.
  2. 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.
  3. Widely disseminate all new NCD policy reports to appropriate congressional and agency staff and offer to brief staff on the contents.
  4. When appropriate, offer specific legislative language for consideration by congressional staff in the drafting of legislation.

**Cross-Agency Collaborations:**

1. Collaborate across the government with Cabinet level agencies on technical review of briefing materials as appropriate.
2. Coordinate and meet with Cabinet level agencies regarding oversight and implementation of NCD policy advice.
3. Increase time of NCD staff and appointed Council members spent in direct engagement of congressional and Administration policymakers with NCD’s policy advice; and/or of radio, television, print, and online media regarding topics NCD has engaged.

**Strategies:**

* 1. 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.
  2. Invite participation of congressional state delegations at Council meetings that take place three times a year in geographically diverse locations.
  3. Provide annual media training for the Council members in best practices of

**Cross-Agency Collaborations:**

1. 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.
2. 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 to help inform policymakers’ work.**

### Objectives:

1. Engage the disability community beyond Washington, DC, soliciting their views regarding timely policy matters and providing the input of the disability community for policymakers to weigh in their decision making.

**Strategies:**

* 1. Leverage agency social media platforms to conduct agency “Twitter chats” on issues that are the topic of past or upcoming NCD reports.
  2. 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.
  3. Identify and bring members of the disability community to Washington, DC to provide testimony at congressional hearings and NCD briefings and meetings.
  4. Enhance community participation at NCD quarterly meetings.

**Cross-Agency Collaborations:**

1. 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.
2. 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.
3. 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.
4. Develop information partnerships with subject matter experts inside and outside the disability community to generate effective intelligence for policymakers to use in weighing issues.

**Strategies:**

* 1. 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.
  2. 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.
  3. 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.
  4. 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:**

1. 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.
2. 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.
3. 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 in order to effectively service execution of statutory duties.**

### Objectives:

1. Evaluate and update agency information technology (IT) infrastructure.

**Strategies:**

* 1. Collaborate with agency cyber leadership and Department of Homeland Security (DHS) program managers to discuss proven practices, successes, challenges, and recommended mitigations.
  2. Participate in conference calls with OMB Cyber, the Small Agency CISO Council and Federal Network Resilience (FNR) Agency Support Coordination to discuss the Cybersecurity National Action Plan (CNAP).
  3. Enter into an agreement with DHS to deploy EINSTEIN capabilities which will look for network traffic indicating known or suspected malicious cyber activity.
  4. Enter into an agreement with DOI to perform Security Authorization and Assessment (SA&A) services
  5. Update Microsoft platform to advance services for meetings, email, file sharing, analytics, compliance, IT management, and cloud PBX

**Cross-Agency Collaborations:**

1. Collaborate across the government with Representatives from DHS Federal Network Resilience and US-CERT to obtain answers about the Binding Operational Directive 16-02 (BOD) and Federal Cybersecurity Coordination, Assessment, and Response (C-CAR) and discuss Agency next steps.
2. Participate with OMB in discussing OPM Cyber Incidents.
3. Coordinate with DHS in deploying E3A to enhance cybersecurity analysis, situational awareness, and security responses.
4. Comply with new BOD 18-02 reporting requirements and complete all required remediation.
5. Enhance planning and evaluation of all agency projects to ensure continual improvements.

**Strategies:**

1. 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.
2. 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.
3. Examine outcome measures and the impact of the project to inform future agency project decisions.

**Cross-Agency Collaborations:**

1. 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:**

1. Implement best practices by thoroughly reviewing all financial documents and processes annually.
2. Document reasons for unusual/significant changes.
3. Clearly document reconciliations and manual adjustments.
4. Accounting policies will be clear and readily available to the council and management
5. Develop policies to prevent errors.
6. Develop policies and procedures to detect and correct errors.

**Cross-Agency Collaborations:**

1. Partner with GSA Office of the Chief Financial Officer (OCFO) to ensure timely and accurate processing of all financial transactions.
2. Partner with GSA Office of the Chief Financial Officer (OCFO) to ensure compliance with all federal financial reporting requirements.
3. Update all agency internal policies and procedures.

**Strategies:**

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

**Cross-Agency Collaborations:**

* 1. Collaborate with the General Services Administration Commissions and Boards (GSACABS) and the Office of Personnel Management (OPM) on technical review of policies and procedures as appropriate.
  2. Collaborate with the Office of Management and Budget’s (OMB) and the Government Accountability Office (GAO) 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. Enhance new staff orientation materials and process.

**Strategies:**

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

**Cross-Agency Collaborations:**

1. 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 (ADA)
2. Coordinate with GSACABS on Federal orientation procedures and administering the Oath of Office.
3. Perform a SWOT analysis and identify best practices from select agency projects from the prior fiscal year.

1. Identify professional development opportunities to support improvement in areas identified as weaknesses or signifying skills gaps by project analysis.

**Strategies:**

1. Align employee training and development efforts with the organization's mission, goals, and objectives.
2. Supervisors develop an understanding of their employees' professional goals, strengths, and development needs.
3. 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:**

1. Management participate in Small Agency Groups as a resource for training opportunities.
2. Coordinate across the government to obtain training opportunities.

# Major Management Priorities and Challenges

NCD is proud to present this five-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 reduced 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 million, 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.

For the FY18 – FY22 time period, as reflected in particular in Goal 5 – Enhance agency operational and programmatic internal controls in order to effectively service execution of statutory duties – and in support of all the other goals, NCD management has chosen to prioritize enhancements to managing its projects (planning and evaluation) in an effort to deliver even greater impact.

# 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 developed the objectives to strategic goals 1 and 2 with a 1-2 year timeframe in mind (with new objectives to replace completed ones during annual strategic reviews) as a result of surveying congressional priorities as expressed in congressional leadership statements and platforms; national trends, as outlined through data collected by the U.S. Census Bureau, the Bureau of Labor Statistics, the Social Security and Medicare Board of Trustees’, the Government Accountability Office, and other federal sources; and priorities of the Administration as communicated through the President’s Budget. 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 3 and 4 in consideration of written and verbal feedback received by NCD stakeholders and congressional staff, 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 FY18-FY22 time period to inform updates to the strategic plan each year.

1. <http://www.gao.gov/assets/690/682776.pdf>. [↑](#footnote-ref-1)
2. <https://www.ssa.gov/oact/tr/2017/index.html>. [↑](#footnote-ref-2)
3. <https://www.gao.gov/fiscal_outlook/federal_fiscal_outlook/overview#t=0>. [↑](#footnote-ref-3)
4. <http://www.ncsl.org/research/education/school-choice-and-charters.aspx>. [↑](#footnote-ref-4)
5. 29 U.S.C. 781, Duties of National Council. [↑](#footnote-ref-5)
6. Ibid. [↑](#footnote-ref-6)
7. Hearing of the Senate Special Committee on Aging, “Trust Betrayed: Financial Abuse of Older Americans by Guardians and Others in Power,” December 1, 2016. [↑](#footnote-ref-7)
8. U.S. Census Bureau, “An Aging Nation: The Older Population in the United States” (May 2014), at: <https://www.census.gov/prod/2014pubs/p25-1140.pdf>. [↑](#footnote-ref-8)
9. 29 U.S.C. 781, Duties of National Council. [↑](#footnote-ref-9)
10. Social Security and Medicare Boards of Trustees, “A Summary of the 2017 Annual Reports,” at: <https://www.ssa.gov/oact/trsum/>. [↑](#footnote-ref-10)
11. 29 U.S.C. 781, Duties of National Council. [↑](#footnote-ref-11)
12. Ibid. [↑](#footnote-ref-12)
13. Executive Order 13781, ““Presidential Executive Order on a Comprehensive Plan for Reorganizing the Executive Branch,” at: <https://www.whitehouse.gov/the-press-office/2017/03/13/presidential-executive-order-comprehensive-plan-reorganizing-executive>. [↑](#footnote-ref-13)
14. 29 U.S.C. 781, Duties of National Council. [↑](#footnote-ref-14)
15. 29 U.S.C. 781, Duties of National Council. [↑](#footnote-ref-15)
16. Executive Order 13781, ““Presidential Executive Order on a Comprehensive Plan for Reorganizing the Executive Branch,” at: <https://www.whitehouse.gov/the-press-office/2017/03/13/presidential-executive-order-comprehensive-plan-reorganizing-executive>. [↑](#footnote-ref-16)
17. U.S. Government Accountability Office, 2017 High Risk List, at: <https://www.gao.gov/highrisk/overview>. [↑](#footnote-ref-17)
18. 29 U.S.C. 781, Duties of National Council. [↑](#footnote-ref-18)
19. 29 U.S.C. 781, Duties of National Council. [↑](#footnote-ref-19)
20. 29 U.S.C. 781, Duties of National Council. [↑](#footnote-ref-20)
21. Ibid. [↑](#footnote-ref-21)
22. Ibid. [↑](#footnote-ref-22)
23. Ibid. [↑](#footnote-ref-23)
24. Ibid. [↑](#footnote-ref-24)
25. Available at: <https://www.whitehouse.gov/the-press-office/2017/05/11/presidential-executive-order-strengthening-cybersecurity-federal>. [↑](#footnote-ref-25)
26. Available at: <https://www.dhs.gov/einstein>. [↑](#footnote-ref-26)
27. Public Law No. 114-264. [↑](#footnote-ref-27)