

American Association on Health and Disability
110 N. Washington Street, Suite 328J
Rockville, MD 20850
301-545-6140
www.aahd.us

July 27th, 2011

Garth Graham, M.D., M.P.H.
Deputy Assistant Secretary for Minority Health
The Office of Minority Health
US Department of Health and Human Services
Washington, DC 20013-73337

SUBJECT: Proposed Data Collection Standards for Race, Ethnicity, Primary Language, Sex and Disability Status Required by Section 4302 of the Affordable Care Act

Docket ID Number: HHS-OMH 2011-0013

Dear Dr. Graham,

The American Association on Health and Disability (AAHD) is commenting on the Department's notice of proposed rulemaking on proposed *Data Collection Standards for Race, Ethnicity, Primary Language, Sex and Disability Status required by Section 4302 of the Affordable Care Act*.

AAHD (www.aahd.us) is the only national organization specifically dedicated to advancing health promotion and wellness initiatives. The official publication of AAHD is the *Disability and Health Journal* (www.disabilityandhealthjnl.com) a scholarly, peer-reviewed, Medline-indexed journal that focuses on health promotion and wellness initiatives for people with disabilities.

AAHD thanks you for including the six disability-related questions from the ACS in the Proposed Data Collection Standards mandated by the ACA. However, AAHD has the following comments specific to refining the questions and adding new questions to better capture people with disabilities.

AAHD strongly supports the Department's proposal to use a standard set of questions on disability that span all federal surveys that seek to obtain demographic data. Further, we agree with many of our colleagues and support the position that the same standard set of questions be used by federally conducted or supported health care or public health programs or activities in

order to collect accurate data on disability status, as required by Section 4302 of the ACA.

AAHD contends that the use of the six proposed questions only be used as a beginning, as the ACS six questions **do not accurately** identify people with certain mental health, speech, developmental or learning impairments as well as those with limitations associated with certain neurological conditions. AAHD urges the Department to develop **additional** questions that will increase the capacity to identify people with activity limitations that may be underrepresented by the current ACS specific to mental health, learning, development, speech and neurological challenges. Additional questions are necessary because otherwise people who experience health disparities and healthcare access barriers associated with their functional limitations are likely not to be counted.

Best regards,

Roberta Carlin, MS, JD
AAHD Executive Director