



November 1, 2021

Dr. Marcella Nunez-Smith
Chair, COVID-19 Health Equity Task Force
Office of Minority Health
U.S. Department of Health and Human Services

Re: Disability and Rehabilitation Research Coalition Comments on Final Health Equity Task Force Report and Recommendations

On behalf of the Disability and Rehabilitation Research Coalition (DRRC), we thank the COVID-19 Health Equity Task Force for its work over the past ten months and for the opportunity to comment on the Task Force's final report and recommendations. We greatly appreciate the Task Force's efforts to advance health equity for underserved populations, including people with disabilities, and congratulate the members of the Task Force on the completion of the final report.

The DRRC is a coalition of more than 25 national research, clinical, and consumer non-profit organizations committed to improving the science of rehabilitation, disability, and independent living. The DRRC seeks to maximize the return on the federal investment in these areas with the goal of improving the ability of Americans with disabilities to live and function as independently as possible following an injury, illness, disability, or chronic condition. The coalition plays a leadership role in coordinating the activities of stakeholders to increase and leverage federal resources devoted to research and development in these domains.

Earlier this year, members of the DRRC Steering Committee had the opportunity to meet with Dr. Nunez-Smith and other representatives from the Task Force and discuss recommendations for the Task Force's mission from a disability perspective. We are glad to see that many of these concepts are incorporated throughout the final report. In particular, we appreciate the Task Force's recognition of the importance of robust demographic data collection, especially disability status data.

As the members of the Task Force well know, demographic data collection is critical to advancing equity, not only to support traditional research endeavors, but to better identify and understand the disparities and inequities faced by people with disabilities and underserved populations. Furthermore, accurate and comprehensive data, disaggregated by disability status and other demographic factors, allows policymakers and other stakeholders to more appropriately develop and evaluate policy solutions addressing the needs of people with disabilities and other underserved populations.

The COVID-19 pandemic has laid bare and, in many cases, exacerbated not only the health disparities and inequities that these populations face, but the inadequacies of the current data

collection regime at the federal, state, and local levels. For too long, there has been a lack of reliable information on how people with disabilities are impacted by any number of factors. During the pandemic in particular, it has been incredibly difficult to accurately gauge the extent to which people with disabilities are facing disproportionately higher risks of COVID-19 exposure, infection, serious and life-threatening symptoms, hospitalization, and death. The gaps in disability data collection are replicated to varying degrees across other demographic categories as well. It is also critical to understand the intersectionality of race, age, disability, geography, chronic illness, and other identities; without improved data collection including disability status, the impact of these intersections will remain opaque.

We have also seen that the Biden Administration has led the charge in placing a greater focus on equity and social determinants in health policy discussions, which we strongly support. The President's Executive Order 13985 made it a goal across the federal government to advance equity and support for underserved communities, including people with disabilities. We fully support the recognition that the government's goal in advancing equity is "to provide everyone with the opportunity to reach their full potential," and recognize that the Task Force's recommendations are essential to carrying out this charge. This Order also established an Interagency Working Group on Equitable Data. We believe that that mandating and standardizing the collection of disability status data along with other demographic data regarding the COVID-19 pandemic and public health efforts more broadly would be an important first step towards fulfilling the mission of this Executive Order.

Unfortunately, we have seen that too often disability communities are omitted from these discussions or only included as an afterthought, despite the inclusion of people with disabilities in the Executive Order. Disability status must be explicitly recognized as a mandatory category for demographic data collection across all federal efforts. We thank the Task Force for recognizing this need and hope the recommendations in today's report are taken into consideration by other federal agencies.

Between the Task Force's report and the ongoing work of the Interagency Working Group on Equitable Data, the Administration's commitment to improving and standardizing demographic data is clear, and we look forward to seeing these recommendations implemented throughout the federal government. Today's report is an important first step, but policymakers and external stakeholders need to continue working together to ensure they are appropriately acted upon. The inclusion of the Implementation Plan and Accountability Framework in the report is crucial to accomplishing this goal, and we look forward to working with your colleagues across the Administration and Congress to help ensure these recommendations are implemented.

We greatly appreciate your consideration of our comments and our recommendations as the Task Force conducted its work. The DRRC stands ready to serve as a resource for the members of the Task Force and the rest of the Biden Administration to answer any questions that may arise and provide technical expertise on behalf of the field as the implementation process for the Task Force's recommendations unfolds. If we can be of any further assistance, please do not hesitate

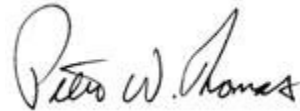
to contact the DRRC coordinators, Peter Thomas, Joe Nahra, and Bobby Silverstein, at 202-466-6550 or by email at Peter.Thomas@PowersLaw.com, Joseph.Nahra@PowersLaw.com, and Bobby.Silverstein@PowersLaw.com.

Sincerely,

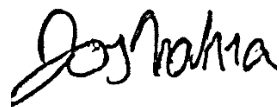
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