April 7, 2017

Veronica Hogan  
U.S. Department of Health and Human Services: Administration for Community Living  
330 C Street, Room 1133D  
Washington DC, 20201

RE: Agency Information Collection Activities; Proposed Collection; Public Comment Request; Revision of a Currently Approved Information Collection (ICR-REV); Centers for Independent Living Annual Program Performance Report (CILPPR)


Dear Ms. Hogan,

The Fenway Institute submits this letter in response to the Notice published in the Federal Register on February 23, 2017, which seeks comments regarding revisions to a previously approved collection, the Centers for Independent Living Program Performance Report (CILPPR). In particular, we are commenting to emphasize the importance of retaining sexual orientation and gender identity (SOGI) questions on the CILPPR.

Research has shown higher rates of mental and physical disability among the lesbian, gay, and bisexual population compared to the rest of the general population.¹ In a sample of 2,560 lesbian, gay, bisexual, and transgender (LGBT) older adults aged 50 – 95 receiving services from LGBT aging organizations in 11 U.S. cities, researchers found that 47% of these LGBT elders have a physical disability.² Aggregate data from 2003 – 2010 from the Washington State Behavioral Risk Factor Surveillance System showed that 41% of lesbian, gay, and bisexual people aged 50 or older in Washington state had a physical disability compared to 35% of heterosexuals in the same age group.³ This difference was statistically significant.

Collection of SOGI data on the CILPPR is essential to understanding the extent to which LGBT people access disability services, and whether there are any differences in access to services for this population. This collection of data on LGBT program participants ensures that programs meet the needs of LGBT citizens, who experience high rates of economic insecurity, social isolation and discrimination.
LGBT people experience discrimination in employment, housing, and public accommodations. They also experience discrimination in health care, which takes the form of healthcare providers using harsh or abusive language, blaming patients for their health status, being physically rough or abusive, or refusing care outright. A growing body of research has documented lesbian, gay, bisexual, transgender (LGBT) health disparities in health and disease outcomes, risk behaviors and factors, rates of insurance coverage, access to preventive care, and access to culturally competent care. We strongly believe that inclusion of the SOGI questions on this survey is crucial to ensuring that LGBT individuals access disability services, such as those provided by the Centers for Independent Living. We therefore urge the Administration for Community Living (ACL) to modify the proposed survey to preserve the SOGI questions in order to collect data on the effectiveness and equity of critical safety net programs for LGBT Americans. We stand ready to assist in this effort.

Through research and evaluation, education and training, policy analysis, and public health advocacy, The Fenway Institute strives to improve the health of LGBT people and people living with HIV/AIDS. The LGBT Aging Project is a program of The Fenway Institute dedicated to ensuring that lesbian, gay, bisexual, and transgender older adults have equal access to life-prolonging benefits, protections, services and institutions that their heterosexual neighbors take for granted.

Sincerely,

Kenneth Mayer, MD, FACP
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Director of HIV Prevention Research, Beth Israel Deaconess Medical Center
Professor of Medicine, Harvard Medical School

Sean Cahill, PhD
Director of Health Policy Research, The Fenway Institute

Lisa Krinsky, MSW, LICSW
Director, LGBT Aging Project
References


7 Lambda Legal. 2010. When Health Care Isn’t Caring: Lambda Legal’s Survey of Discrimination against LGBT People and People with HIV. New York: Lambda Legal.


9 Lambda Legal, 2010.


12 Committee on Lesbian, Gay, Bisexual, and Transgender Health Issues and Research Gaps and Opportunities; Board on the Health of Select Populations; Institute of Medicine. 2011. The Health of Lesbian, Gay, Bisexual, and Transgender (LGBT) People.


