

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

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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)

Submitted online at

<https://www.federalregister.gov/documents/2017/02/23/2017-03486/agency-information-collection-activities-proposed-collection-public-comment-request-revision-of-a>

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,⁴ housing,⁵ and public accommodations.⁶ They also experience discrimination in health care,^{7,8} 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.⁹ A growing body of research has documented lesbian, gay, bisexual, transgender (LGBT) health disparities in health and disease outcomes,^{10,11} risk behaviors and factors,^{12,13} rates of insurance coverage,^{14,15} access to preventive care,^{16,17} and access to culturally competent care.¹⁸ 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
Co-chair and Medical Research Director, The Fenway Institute
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Professor of Medicine, Harvard Medical School

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References

- ¹ Fredriksen-Goldsen, K., Kim, H., Barkan, S. 2012. "Disability Among Lesbian, Gay, and Bisexual Adults: Disparities in Prevalence and Risk." *American Journal of Public Health*. 2012 January; 102(1): e16 – e21. doi: 10.2105/AJPH.2011.300379.
- ² Fredriksen-Goldsen, K. et al. 2011. *The Aging and Health Report: Disparities and Resilience among Lesbian, Gay, Bisexual, and Transgender Older Adults*. Seattle: Institute for Multigenerational Health.
- ³ Fredriksen-Goldsen, K. et al. 2011. *The Aging and Health Report: Disparities and Resilience among Lesbian, Gay, Bisexual, and Transgender Older Adults*. Seattle: Institute for Multigenerational Health.
- ⁴ Sears B, Mallory C (2011, July). *Documented evidence of employment discrimination and its effects on LGBT people*. Los Angeles: The Williams Institute, UCLA School of Law. <https://williamsinstitute.law.ucla.edu/wp-content/uploads/Sears-Mallory-Discrimination-July-2011.pdf>
- ⁵ Cahill, S. & Tobias, S. (2007). *Policy Issues Affecting Lesbian, Gay, Bisexual and Transgender Families*. Ann Arbor: University of Michigan Press. 42-43.
- ⁶ Reisner SL, White Hughto JM, Dunham E, Heflin K, Begenyi JB, Coffey-Esquivel J, Cahill S (2015). Legal protections in public accommodations settings: A critical public health issue for transgender and gender nonconforming people. *Milbank Quarterly*. 1-32.
- 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.
- ⁸ Smith, D., and W. Matthews. 2007. "Physicians' Attitudes toward Homosexuality and HIV: Survey of a California Medical Society-Revisited (PATHH-II)." *Journal of Homosexuality* 52(3-4):1-9.
- ⁹ Lambda Legal, 2010.
- ¹⁰ 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: Building a Foundation for Better Understanding*. Washington, DC: National Academies Press.
- ¹¹ Boehmer U, Bowen DJ, Bauer GR. 2007. "Overweight and Obesity in Sexual Minority Women: Evidence from Population-Based Data." *American Journal of Public Health* 97:1134-40. doi:10.2105/AJPH.2006.088419.
- 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*.
- ¹³ Lee J, Griffin G, Melvin C. 2009. "Tobacco Use among Sexual Minorities in the U.S.A., 1987 to May 2007: A Systematic Review." *Tobacco Control* 18(4):275-82. doi:10.1136/tc.2008.028241.
- ¹⁴ Ponce N, Cochran S, Pizer J, et al. 2010. "The Effects of Unequal Access to Health Insurance for Same-Sex Couples in California." *Health Affairs* 29:1539-48. doi:10.1377/hlthaff.2009.0583.
- ¹⁵ Ranji U, Beamesderfer A, Kates J, et al. 2014. *Health and Access to Care and Coverage for Lesbian, Gay, Bisexual, and Transgender Individuals in the U.S.* Menlo Park, CA: Henry J. Kaiser Family Foundation. <http://kff.org/report-section/health-and-access-to-care-and-coverage-for-lgbt-individuals-in-the-u-s-health-challenges/>.
- ¹⁶ Valanis, BG, Bowen DJ, Bassford T, et al. 2000. "Sexual Orientation and Health: Comparisons in the Women's Health Initiative Sample." *Archives of Family Medicine* 9:843-53. PMID: 11031391.
- ¹⁷ Grant JM, Mottet LA, Tanis J, et al. 2011. *Injustice at Every Turn: A Report of the National Transgender Discrimination Survey*. Washington, DC: National Center for Transgender Equality and National Gay and Lesbian Task Force.
- ¹⁸ 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. Available at: http://www.lambdalegal.org/sites/default/files/publications/downloads/whcic-report_when-health-care-isnt-caring.pdf