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April 26, 2022

Office of the National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
330 C St SW, Floor 7  
Washington, DC 20201

*Comments on: Disability Status measures; UNCDI v3 (Measure of Hearing Loss)*

To the Office of the National Coordinator:

The Hearing Loss Association of America (HLAA) is the nation's largest organization representing people with hearing loss. Founded in 1979 as a national, grassroots self-help group, HLAA is an influential, impartial and informed voice. HLAA members and staff represent Americans with hearing loss before the Congress, Federal Trade Commission, Food and Drug Administration, the Federal Communication Commission and other policymaking bodies.

HLAA enthusiastically endorses the proposal to include disability status as a standard element in EHRs. Hearing loss is a leading cause of poor communication in health care settings. Poor hearing has been linked with lower health care quality, misunderstandings and risk for unsafe care in numerous research studies. At the same time, few health care organizations routinely collect information about patients' ability to hear. By mandating the collection of information about hearing status, the ONC takes a critical step toward improving medical care for our community.

Our understanding is that under the proposal, disability status will be captured using the six items from the American Community Survey used by the Census Bureau, including whether the respondent is "Deaf or [has] serious difficulty hearing." While we very much welcome and endorse the use of the ACS question as an initial effort to capture hearing difficulties, we note that this item will capture only those with the most severe hearing loss (see note below, following my signature). Others with less-severe hearing loss also struggle to understand speech in medical care settings. We strongly encourage the ONC to consider questions which capture those additional vulnerable disabled Americans in future iterations.

Yours truly,

A handwritten signature in blue ink that reads "Barbara Kelley".

Barbara Kelley  
Executive Director

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The CDC estimates that 5.9% of American adults respond affirmatively to the ACS question "Are you deaf or [have] serious hearing difficulty hearing," based on an analysis Behavioral Risk Factor Survey (BRFS) data – see CDC "Disability impacts all of us" and the associated analysis by Okoro et al. in MMWR.

Analysis of the National Health Interview Survey (NHIS) data finds that 23% of Americans aged 12 years or older have clinically significant hearing loss, based on objective audiometric criteria (Goman and Lin 2015).