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December 19, 2023

**SUBMITTED ELECTRONICALLY**

Dameka Reese  
Assistant Division Chief of Data Collection  
American Community Survey Office  
U.S. Census Bureau  
4600 Silver Hill Road  
Washington, DC 20233

Re: **American Community Survey and the Puerto Rico Community Survey  
[USBC-2023-0009]**

Dear Assistant Division Chief Reese:

On behalf of the more than 9,000 physiatrists of the American Academy of Physical Medicine and Rehabilitation (AAPM&R), I am writing to share our concerns with the proposed changes to the 2025 American Community Survey (ACS) questions measuring disability, and to request that the U.S. Census Bureau halt implementation on the proposed changes in order to ensure that the disability community can be fully and properly included in this process.

AAPM&R is the national medical specialty organization representing physicians who are specialists in physical medicine and rehabilitation (PM&R). PM&R physicians, also known as physiatrists, treat a wide variety of medical conditions affecting the brain, spinal cord, nerves, bones, joints, ligaments, muscles, and tendons. PM&R physicians evaluate and treat injuries, illnesses, and disability and are experts in designing comprehensive, patient-centered treatment plans. Physiatrists utilize cutting-edge as well as time-tested treatments to maximize function, quality of life, and independence for their patients, and as such are leaders in the field of providing care to the disability community.

Studies frequently show that the largest and most diverse underserved community in the U.S., people with disabilities, are consistently undercounted when it comes to surveying the national population. Unfortunately, it seems likely that the currently proposed changes to the ACS will further undercount the population of people living with disabilities – potentially reducing national disability prevalence estimates by 41% (from 13.9% to 8.1%). The public policy consequences of this potential undercount would be severe. Considering the importance of the data collected by the ACS, it is critical that these estimates accurately represent the population of people with disabilities to appropriately plan, fund, and track trends over time.

**AAPM&R requests that the U.S. Census Bureau halt the implementation of the currently proposed changes to the ACS questions measuring disability and engage stakeholders in the disability community in an open process to develop better methods for future data collection efforts.**

Moving forward, AAPM&R also requests the U.S. Census Bureau work to develop and implement a replicable inclusion plan for comprehensive input from the disability community and key interested parties, both for the current process and for other matter in the future.

AAPM&R also wishes to associate itself with comments submitted on this important matter by the Disability and Rehabilitation Research Coalition (DRRC) and the American Medical Association (AMA), two organizations that have long been engaged in ensuring that the concerns of the disability community, as well as the physicians who are responsible for providing treatment to this community, are properly considered when public policy impacting the disability community is being developed.

AAPM&R greatly appreciates the fact that the U.S. Census Bureau is choosing to focus on disability issues during the necessary process of updating the ACS, however it is imperative that the disability community is fully included in this process. Please halt the proposed changes to the ACS and engage with the disability community to develop a stakeholder-informed approach for developing new, and improved, questions regarding disability on the ACS going forward.

Thank you for engaging with AAPM&R and other stakeholders on this important issue and thank you for your consideration of these comments. Please consider AAPM&R a resource in your efforts moving forward, and if the Academy can be of further assistance please contact Chris Stewart, Director of Advocacy and Government Relations at AAPM&R at [cstewart@aapmr.org](mailto:cstewart@aapmr.org) or 202.256.6580.

Sincerely,



Prakash Jayabalan, MD, PhD, FAAPMR  
Chair, AAPM&R Health Policy & Legislation Committee