

Attn: Request for Public Information  
Office of Management and Budget  
725 17th St., NW  
Washington, DC 20503

**Re: Methods and Leading Practices for Advancing Equity and Support for Underserved Communities through Government**

Submitted via: <https://www.regulations.gov/>

To Whom It May Concern:

My name is Veralucia Mendoza, and I am a Disability Rights Advocate. I am writing to offer comment on behalf of The Ability Center of Greater Toledo, responding to sections 2 and 5.

The Ability Center is a Center for Independent Living that serves Northwest Ohio. Our mission is to assist people with disabilities to live, work, and socialize within a fully accessible community. Thus, we have great interest in making sure that services are accessible for people with disabilities so that they may reside and participate in activities in the setting of their choosing and have full and necessary supports in place for them to live independently.

Barriers to accessing services for people with disabilities are many. A barrier often mentioned by our stakeholders and consumer is administrative requirements. In a publication titled "*The Current State of Healthcare for People with Disabilities*"<sup>1</sup> the National Council on Disability stated, "Much of the Federal research effort remains focused on disability and disease prevention rather than on improving access to, and quality of, health care for people with disabilities, reducing their incidence of secondary health problems, and promoting healthy living." This bias has a direct impact on people with disabilities and their ability to access services. In reality, most people will become disabled at some point in their lifetime, whether temporarily or permanently.

The data is clear that agencies that serve people with disabilities are underfunded. Underserved communities do not happen naturally without human input, they are historically underserved and marginalized systemically. Resources should be allocated specifically for those who fall within these populations to ensure equity in services. One such example is transportation.

In a study conducted by the Ohio Developmental Disabilities Council titled "*Transportation Challenges for Ohioans with Disabilities*," it reported that "Riders did not believe they could make spontaneous or flexible travel decisions, limiting or preventing their participation in a variety of activities and inhibiting integration in their community. For their part, transportation providers indicated they struggled to balance meeting the needs of their clients with budget constraints and regulatory and documentation requirements. Different stakeholders – Ohioans with disabilities, transportation providers, and other professionals – were often in agreement when identifying issues, if not in full agreement on the best solutions."<sup>2</sup> The Ohio Developmental Disabilities Council also included in that report, "Transportation

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<sup>1</sup> *The Current State of Healthcare for People with Disabilities*:  
<https://www.ncd.gov/publications/2009/Sept302009#Disability%20Community%20Advocacy>

<sup>2</sup> *Transportation Challenges for Ohioans with Disabilities* (2017): <https://ddc.ohio.gov/Portals/0/transportation-challenges-7-17.pdf>

providers reported a variety of reasons for not being able to provide services. The most common response (29%) had to do with lack of funding, or with lack of flexibility in using existing funding sources.”<sup>3</sup> A copy of the study is attached to this letter.

Approaches and methods for accessible agency engagement with underserved communities have expanded since the covid-19 pandemic. Engagement with policymakers at federal, state, and local levels increased as we moved to virtual meetings. However, there is no requirement for legislators to allow virtual testimony. In Ohio, several organizations have petitioned for virtual testimony options<sup>4</sup>, as it allows people with disabilities, and those with limited time for travel, an opportunity to make their concerns known to their representatives.

**Conclusion:**

It is imperative that policymakers and legislators continue to invite impacted communities to present on the structural barriers they face daily, including that of administrative hurdles and physical barriers that delay access to services and an increased quality of life. The topics listed in this document are merely part of a larger list of issues people with disabilities are facing, and we hope this small introduction is helpful.

Thank you for the opportunity to submit public comment. Please see my contact information below, and do not hesitate to contact me if you have any additional questions.

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<sup>3</sup> *Transportation Challenges for Ohioans with Disabilities* (2017): <https://ddc.ohio.gov/Portals/0/transportation-challenges-7-17.pdf>

<sup>4</sup> *75 ORGANIZATIONS SIGN ON TO LETTER URGING OHIO LAWMAKERS TO PROVIDE VIRTUAL TESTIMONY OPPORTUNITIES AS PANDEMIC PERSISTS*: <https://www.acluohio.org/en/press-releases/75-organizations-sign-letter-urging-ohio-lawmakers-provide-virtual-testimony>