



April 18, 2022

Dr. Anjali Forber-Pratt  
Director  
National Institute on Disability, Independent Living, and Rehabilitation Research  
330 C St SW  
Washington, DC 20201

ELECTRONIC SUBMISSION VIA [www.regulations.gov](http://www.regulations.gov)

**Re: Proposed Rule Updating NIDILRR Peer Review Criteria (RIN: 0985-AA16)**

Dear Director Forber-Pratt,

On behalf of the Disability and Rehabilitation Research Coalition (DRRC), we appreciate the opportunity to comment on the Administration for Community Living's (ACL) proposed rule change for the National Institute on Disability, Independent Living, and Rehabilitation Research's (NIDILRR), with the purpose of improving the grant application process to encourage inclusion of underserved and underrepresented populations in project staff. **DRRC strongly supports NIDILRR's efforts to encourage outreach and include people with disabilities in peer reviewed research and urges the agency to finalize the proposed rulemaking.**

The DRRC is a coalition of 26 national research, clinical, and consumer non-profit organizations committed to improving the science of rehabilitation, disability, and independent living. The DRRC seeks to maximize the return on the federal research investment in these areas with the goal of improving the ability of Americans with disabilities to live and function as independently as possible following an injury, illness, disability, or chronic condition.

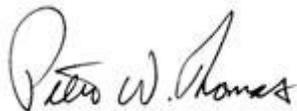
As outlined in the Proposed Rule, NIDILRR's current application review process for research grants includes a criterion to evaluate applicants' diversity in project staff positions. This criterion is "based on race, color, national origin, gender, age or disability," and combines underrepresented groups into a single list. As it stands now, the process does not provide an opportunity for the grant applicant to elaborate on their hiring practices, particularly for individuals with disabilities, with regards to project staff. Under the Proposed Rule, outreach to and hiring practices for people with disabilities and individuals from other underserved communities will be separated into two independent review criteria.

While the federal government has long recognized that people with disabilities are a distinct minority group, the current peer reviewed grant framework does not distinguish between

minority populations and people with disabilities. Creating a distinct group in the process will allow reviewers to evaluate and accurately assess the outreach to and inclusion of those with disabilities in research. Advancing inclusion of this population will enable greater research workforce participation by individuals with disabilities and will not only encourage broader representation across NIDILRR grantees, but also improve and enhance research into programs and care models that can be utilized to improve health access and outcomes. **As such, DRRC strongly supports the proposed adjustment to the grant application process.**

We appreciate the opportunity to provide comments on this matter. If the DRRC can be of any assistance during this rulemaking process, please do not hesitate to contact the DRRC Coordinators at 202-466-6550 or by email at [Peter.Thomas@PowersLaw.com](mailto:Peter.Thomas@PowersLaw.com), [Joseph.Nahra@PowersLaw.com](mailto:Joseph.Nahra@PowersLaw.com), and [Bobby.Silverstein@PowersLaw.com](mailto:Bobby.Silverstein@PowersLaw.com).

Sincerely,



Peter W. Thomas, J.D.  
DRRC Coordinator



Bobby Silverstein, J.D.  
DRRC Coordinator



Joseph Nahra  
DRRC Coordinator

CC: Phillip Beatty, Director, NIDILRR Office of Research Sciences