

July 24, 2023

SUBMITTED ELECTRONICALLY VIA
<https://www.regulations.gov>

Christopher Kuczynski
General Counsel
Architectural and Transportation Barriers Compliance Board
ATTN: ATBCB–2023–0001
Mail Stop
1331 F Street NW, Suite 1000
Washington, DC 21244-1850

Re: [ATBCB–2023–0001] Standards for Accessible Medical Diagnostic Equipment

Dear General Counsel Kuczynski:

The American Geriatrics Society (AGS) greatly appreciates the opportunity to comment on the Architectural and Transportation Barriers Compliance Board (Access Board) Standards for Accessible Medical Diagnostic Equipment (ATBCB–2023–0001). The AGS is a nationwide, not-for-profit society of geriatrics healthcare professionals dedicated to improving the health, independence, and quality of life of older people. Our 6,000+ physician and non-physician practitioners (NPPs) are pioneers in serious illness care for older individuals, with a focus on championing interprofessional teams, eliciting personal care goals, and treating older people as whole persons. The AGS believes in a just society – one where we all are supported by and able to contribute to communities and where ageism, ableism, classism, homophobia, racism, sexism, xenophobia, and other forms of bias and discrimination no longer impact healthcare access, quality, and outcomes for older adults and their caregivers. The AGS advocates for policies and programs that support the health, independence, and quality of life of all of us as we age.

Geriatricians provide care for older adults, usually over the age of 65, with complicated medical issues and social challenges. The AGS appreciates the Access Board’s efforts to ensure access to medical diagnostic equipment and improve provider and patient safety, including for the older population. Considering the unique healthcare needs of older adults, access to medical services and proper medical diagnostic care by transferring onto exam and procedure tables, imaging equipment, weight scales, and other medical diagnostic equipment safely and effectively is critically important for this growing population.

The older adult population is projected to increase dramatically in the coming years. According to the U.S. Census Bureau, the number of people aged 65 and older is estimated to climb from 61.6 million today to more than 94.7 million by 2060, while those 85 and older is projected to more than

double from 7.1 million today to 19 million by 2060.¹ As our aging population increases, so too will the prevalence of diseases disproportionately that affect older people as well as the use of mobility assistive devices. Nearly 10 percent of older adults 65 and older living in the community adopt mobility devices each year.² Older people with chronic illnesses and complex conditions often do not receive optimal care which reduces overall well-being and contributes to disproportionately high healthcare costs for these individuals. Given the increasing number of older Americans with multiple chronic and complex conditions, the quality of care delivered—including medical diagnostic care—must be improved.

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We appreciate the opportunity to share our support for the development of technical criteria to increase accessibility to medical diagnostic equipment which would help to better serve the needs of the older adult population, particularly those using assistive devices. For additional information or if you have any questions, please do not hesitate to contact, Anna Kim at akim@americangeriatrics.org.

Sincerely,



Nancy E. Lundebjerg, MPA
Chief Executive Officer

¹ U.S. Census Bureau. International Database (IDB). Accessed July 21, 2023. https://www.census.gov/data-tools/demo/idb/#/pop?COUNTRY_YEAR=2023&COUNTRY_YR_ANIM=2023&FIPS_SINGLE=US&FIPS=US&popPages=BYAGE&POP_YEARS=2023,2060&menu=popViz&ageGroup=0

² Sharmin F, Sands L. Older adults' adoption of mobility devices: interplay of predisposing factors and precipitating health events. *Innovation in Aging*. 2020;4(1):484-485. [doi:10.1093/geroni/igaa057.1567](https://doi.org/10.1093/geroni/igaa057.1567)