



*For people with intellectual  
and developmental disabilities*

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Office of Technical and Informational Services  
United States Access Board  
1331 F Street, NW, Suite 1000  
Washington, DC 20004-1111

RE: Docket No. ATBCB-2012-0003- Proposed Accessibility Standards for Medical Diagnostic Equipment

Dear Members of the US Access Board:

The Arc appreciates the opportunity to comment on the Access Board's proposed Accessibility Standards for Medical Diagnostic Equipment. The Arc is a membership organization of over 700 state and local chapters made up of people with intellectual, developmental and other disabilities, their families, friends, interested citizens, and professionals in the disability field. The Arc has represented individuals with disabilities for nearly 60 years.

The Arc supports the comments provided by the Disability Rights Education and Defense Fund (DREDF). We especially concur with and would like to emphasize DREDF's strong suggestion that the Access Board include in the standards recommendations that medical staff receive comprehensive training on ensuring access for a wide range of disabilities.

In order to make medical diagnostic equipment accessible for people with intellectual and developmental disabilities (I/DD), staff must receive training. Staff will need training in how to communicate effectively with people with I/DD (clear language, visual prompts, demonstrations, etc.) and in how to work with individuals with I/DD so that they understand what is going to happen. People with intellectual and developmental disabilities (I/DD) may need additional time to receive information and instructions about equipment. Some individuals with I/DD will need hands-on assistance in order to use equipment that communicates instructions or other information to the patient. Longer appointment times may be necessary for individuals with I/DD.

For some individuals with I/DD, experiences with the health care system have not been positive. Individuals might be fearful and need extra time and staff attention to help them overcome those fears. Staff will need to understand that for some individuals, several

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appointments might be necessary before the individual is comfortable enough to undergo a medical diagnostic exam. For individuals with I/DD, staff training is an essential component in making medical diagnostic equipment accessible.

Thank you, again, for the opportunity to offer comments.

Sincerely,

Maureen Fitzgerald  
Director Disability Rights