



NATIONAL STUTTERING ASSOCIATION
CHANGING THE LIVES OF PEOPLE WHO STUTTER

January 28, 2021

Vanessa Countryman, Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Via Email: rule-comments@sec.gov

Re: Notice of Filing of Proposed Rule Change to Adopt Listing Rules Related to Board Diversity
Release No. 34-90574

Dear Ms. Countryman:

I am writing to you on behalf of the National Stuttering Association, representing the millions of people who stutter, their families, and subject matter experts across the United States.

On behalf of the National Stuttering Association, we respectfully submit this letter in connection with the public comment period concerning Nasdaq's proposed listing rules related to board diversity. Without alteration, the changes referenced above would require all companies listed on Nasdaq's U.S. exchange to publicly disclose diversity statistics regarding their board of directors.

We applaud the U.S. Securities and Exchange Commission's progress toward equity in board composition; however, we remain concerned that the rule change excludes people with disabilities, including people who stutter.

Millions of Americans experience stuttering in their lifetimes. While employers are highly likely to encounter people who stutter among job applicants and within their workforce, however, people who stutter often experience difficulty being hired and advancing within their careers. Research indicates that negative perceptions of stuttering and false associations between stuttering and limited capacity manifest as a significant disparity in earnings between people who stutter and people who do not stutter. Unfortunately, the stuttering community has also been

witness to numerous instances of mocking, misunderstanding, and misinformation about stuttering, perpetuating challenges in the workplace.

The public's widespread false assumptions and myths about stuttering and what it implies about people who stutter are harmful and lead to unjust discrimination despite a person who stutters' ability to perform the responsibilities of a job.

As such, the National Stuttering Association encourages the SEC to add language identifying people with disabilities, as described in the American Disabilities Act, to the proposed rule changes, general reporting requirements, and board disclosure requirements.

To eliminate the many workplace stigmas necessary to improve employment outcomes for people who stutter requires representation in leadership positions and recognition of the value of the contributions of the stuttering community, which includes physicians, attorneys, corporate executives, and leaders in public office, among others.

The Americans with Disabilities Act took a step in this direction, prohibiting discrimination on the basis of disability. We implore further progress, including the requirement of inclusion of qualified people with disabilities in board leadership. Societal perception of disabilities often prevents the full participation of those who self-identify as disabled to a greater extent than the disability itself. Efforts to embrace inclusion of the disability community will improve employment outcomes for those with disabilities, diversifies the corporate workforce, and improves connection with the consumer base.

If you have any questions about stuttering, the impact stuttering can have on people in the workplace and/or leadership positions, or our request to include disability as a diversity statistic, I would be happy to provide additional information at your convenience. You may reach me at [REDACTED] or [REDACTED].

Thank you for your consideration of our request to improve inclusion of all underrepresented groups, including those who identify as disabled.

Sincerely,

Tammy Flores
Executive Director
National Stuttering Association