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## **DECLARATION OF INGRID M. ALLARD**

I, Ingrid M. Allard, hereby declare the following:

UNITED STATES DISTRICT COURT

- 1. I am over the age of eighteen. I reside in Albany, New York.
- 2. I am a pediatrician at a hospital in the City of Albany. I attended medical school at Mount Sinai School of Medicine and completed my residency at Montefiore Medical Center, Albert Einstein College of Medicine. I completed a Masters of Science in medical education at the University of Southern California, Keck School of Medicine.
- 3. The figures below are from The 2009 Community Health Profile: A Compendium of Public Health Data for Albany Rensselaer and Schenectady Counties, prepared by the Healthy Capital District Initiative. Attached hereto as Exhibit 1 is a true and correct copy of that report.
- 4. The following figures are based on data provided by the New York State Department of Health Vital Statistics, 2001-2005, and are age adjusted.
- 5. In Albany County, the AIDS mortality rate per 100,000 is 32.6 for blacks, compared with 0.9 for whites. See Exhibit 1, at 73.

- 6. In Albany County, the asthma mortality rate per 100,000,000 is 41.2 for blacks, compared with 10.2 for whites. See Exhibit 1, at 73.
- 7. In Albany County, the diabetes mortality rate per 100,000 is 29.5 for blacks, compared with 14.3 for whites. See Exhibit 1, at 73.
- 8. In Albany County, the homicide mortality rate per 100,000 is 16.1 for blacks, compared with 1.3 for whites. See Exhibit 1, at 74.
- 9. The Loudonville and Latham areas of Albany County are comprised mostly of non-minority residents.
- 10. The North Albany and Menands area, the West End area, and the West Hill and South End area have a high concentration of minorities relative to other areas of Albany County. The following figures represent the frequencies for populations in these areas, and are not adjusted for state and national comparison purposes.
- 11. In the North Albany and Menands area, the coronary heart disease mortality rate per 100,000 is 587, which is 132% above the Albany County rate. See Exhibit 1, at 79.
- 12. In the North Albany and Menands area, the chronic lower respiratory disease mortality rate per 100,000 is 103, which is 115% above the Albany County rate. See Exhibit 1, at 79.
- 13. The following figures are based on data provided by the New York State Department of Health, SPARCS 2001-2005, and are age adjusted.
- 14. In Albany County, the asthma hospitalization rate per 10,000 is 23.7 for blacks, compared with 6 for whites. See Exhibit 1, at 81.
- 15. In Albany County, the assault hospitalization rate per 10,000 is 12.6 for blacks, compared with 1.5 for whites. See Exhibit 1, at 81.

- 16. In Albany County, the coronary heart disease hospitalization rate per 10,000 is 28.6 for blacks, compared with 19.4 for whites. See Exhibit 1, at 81.
- 17. In Albany County, the chronic obstructive pulmonary disease hospitalization rate per 10,000 is 35.2 for blacks, compared with 16.3 for whites. See Exhibit 1, at 81.
- 18. In Albany County, the diabetes (of any Dx) hospitalization rate per 10,000 is 271.7 for blacks, compared with 90.5 for whites. See Exhibit 1, at 81.
- 19. In the West End, West Hill and South End areas, the rate of hospitalization per 10,000 is more than 150% of the Albany County rate in asthma hospitalization (more than 160% higher), assault hospitalization (300% higher), and, for the South End, chronic obstructive pulmonary disease (100% higher). See Exhibit 1, at 83.
- 20. In the North Albany/Menands, West End, and West Hill/South End areas, the hospital admissions as a percentage of the expected rate are 154%, 136%, and 165%, respectively. These figures demonstrate how a given area's rate of hospital admissions, after being adjusted for age and sex, compares to that of the state as a whole (hereafter referred to as "admissions compared to the expected rate"). The admissions compared to the expected rate for the Latham and Loudonville areas, on the other hand, are 64% and 93%, respectively. See Exhibit 1, at 91.
- 21. In the North Albany/Menands, West End, and West Hill/South End areas, the hospital admissions for bacterial pneumonia compared to the expected rate are 194%, 104%, and 146%, respectively. The admissions compared to the expected rate for the Latham and Loudonville areas, on the other hand, are 65% and 115%, respectively. See Exhibit 1, at 92.
- 22. In the North Albany/Menands, West End, and West Hill/South End areas, the hospital admissions for acute conditions compared to the expected rate are 218%, 116%, and

136%, respectively. The admissions compared to the expected rate for the Latham and Loudonville areas, on the other hand, are 75% and 133%, respectively. See Exhibit 1, at 93.

- 23. In the North Albany/Menands, West End, and West Hill/South End areas, the hospital admissions for congestive heart failure compared to the expected rate are 128%, 112%, and 118%, respectively. The admissions compared to the expected rate for the Latham and Loudonville areas, on the other hand, are 72% and 108%, respectively. See Exhibit 1, at 94.
- 24. In the West End and West Hill/South End areas, the hospital admissions for diabetes long-term complication compared to the expected rate are 156% and 248%, respectively. The admissions compared to the expected rate for the Latham and Loudonville areas, on the other hand, are 21% and 33%, respectively. See Exhibit 1, at 96.
- 25. In the West End and West Hill/South End areas, the teen (15-17) birth rate per 1,000 females is over 200% more than the rate for Albany County. See Exhibit 1, at 100.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 14, 2011

Ingrid M. allard, MD