

Testimony on the Importance of an Adequate Public Comment Window for Changes to DDA Policies and Manuals (SB0583)

An adequate public comment window for changes to Developmental Disabilities Administration (DDA) policies and manuals is not a procedural formality, it is a necessary safeguard to ensure that policies are effective, equitable, and aligned with the real-world needs of the people they affect.

DDA policies directly shape the lives of individuals with developmental disabilities, their families, and the professionals who support them. Changes to these policies can impact eligibility, service access, provider operations, health and safety outcomes, and individual rights. Because of this, policy and manual development must be informed by those with lived experience and operational knowledge. A meaningful comment period is the primary mechanism through which this input can be gathered.

Adequate time for review is essential due to the complexity of DDA policies and manuals. These documents are often lengthy, technical, and interconnected. Stakeholders—including individuals with disabilities, families, advocates, providers, and case managers—need sufficient time to understand proposed changes, assess their implications, consult with others, and provide thoughtful, accurate feedback. Short or rushed comment windows limit participation to only those with significant resources and capacity, effectively excluding many of the people most impacted by the changes.

A robust comment period also improves policy quality. Stakeholders routinely identify unintended consequences, implementation barriers, conflicts with existing regulations, and clarity issues that may not be apparent during internal drafting. Incorporating this feedback before policies are finalized reduces the need for later corrections, emergency guidance, or costly revisions. In this way, public comment is not an obstacle to efficiency, it is a tool for getting policies right the first time.

Transparency and trust are additional critical considerations. When stakeholders are given adequate notice and time to comment, it signals that DDA values collaboration and accountability. Conversely, abbreviated or perfunctory comment periods can erode trust and create the perception that decisions have already been made without meaningful input. Trust is especially important in systems serving vulnerable populations, where confidence in the fairness and responsiveness of the agency directly affects engagement and compliance.

In Colorado, HCPF sends policy changes to all stakeholders via email. They explain each policy and provide stakeholders a spot to be able to provide their response after each policy (see attached). Recently, DDA updated a 200+ page policy manual, provided no comment window, and gave us only 3 weeks to adjust to all of the upcoming changes (see attached). The amount of money wasted by DDA on the confusion they created must be astronomical.

Finally, an adequate comment window supports equity. Individuals with disabilities and their families often face barriers related to communication access, health needs, caregiving responsibilities, and limited resources. Sufficient time allows for accommodations, plain-language explanations, and community discussion, ensuring that participation is not limited to a narrow subset of stakeholders.

For these reasons, providing an adequate and consistent public comment window on DDA policy and manual changes is essential. It strengthens policy outcomes, protects the interests of those served, promotes transparency, and upholds the integrity of the DDA system. Meaningful engagement requires meaningful time, and DDA policies deserve nothing less.

Thank you,



Kaylee Cooper: Mother to DDA Participant and Hayden Cooper: DDA Participant

Medicaid Innovation and Sustainability Opportunities: Policy Options Feedback Request

From Colorado Dept. of Health Care Policy and Financing

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To unity.ed@proton.me

Date Thursday, February 5th, 2026 at 12:01 PM



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Department of Health Care
Policy & Financing

Your input will help us shape short and long-term policy decisions!

[Provide feedback](#) by Feb. 9 on the ideas shared on our recent webinar.

Thank you for your continued interest in the Medicaid Innovation and Sustainability Opportunities (MISO) project. Please [complete the feedback form](#) by 5 p.m. on **Monday, Feb. 9.**

This feedback opportunity is a follow-up to the MISO webinar on Jan. 27, 2026, which covered policy actions developed by Manatt Health Strategies and the Colorado Department of Health Care Policy and Financing (HCPF). Manatt recently conducted an analysis of Colorado's Medicaid and Child Health Plan Plus (CHP+) program cost drivers and compared these trends to several states. Following the analysis, Manatt analyzed options for potential short and long-term policy changes to improve the affordability and sustainability of the Medicaid and CHP+ programs.

If you weren't able to join us, recordings of the January webinar in English, Spanish, and American Sign Language (ASL) are posted to the [HCPF Sustainability webpage](#), where you can also find recordings from the December MISO webinar.

Please contact HCPF_stakeholders@state.co.us with any questions or concerns.

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**Developmental
Disabilities Administration**

Self-Directed Services Manual

201 West Preston Street, 4th Floor
Baltimore, Maryland 21201

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