

SB0583/HB1953 FAV

Developmental Disabilities Administration - Self-Directed Services Manual - Public Comment

Martha Gabler, District 20
10125 Markham St., Silver Spring, MD, 20901
February 20, 2026

Dear Respected Members of the Senate Finance Committee:

I am FAVORABLE in regard to this bill and respectfully request your support.

My family is directly affected by the concerns raised in this bill. My name is Martha Gabler. I am the Mother and Legal Guardian of Douglas Gabler, a profoundly nonverbal 29-year-old man with severe autism. Douglas has participated in Self-Directed Services under the DDA Community Pathways Waiver since 2017.

We appreciate Douglas's opportunity to participate in Self-Direction because he is thriving with this personalized approach. He has an excellent daytime Direct Support Professional who has been supporting him for 5.5 years! As a result, Douglas has the opportunity to participate in community activities and volunteer work that truly bring joy and accomplishment to his life and to others.

Self-Direction is a complex program for Participants and families to navigate. Many of the rules are excellent, because they set out the rights and responsibilities of the many parties involved in each Participant's plan. We welcome rules and procedures that support accountability and reporting requirements, and we take pains to comply with them.

However, we do not welcome sudden, unexplained policy changes that are imposed with no notice, no reason or explanation, and no opportunity to collaborate. These constant changes have made the system feel oppressive, and result in constant chaos as we jump through hoop after hoop trying to comply with confusing requirements. Alas, this has been the pattern for the last two years.

The first big example of this was the surprise release of the Self-Directed Policy Manual in 2024. On Thursday, October 24, 2024, the Self-Directed community was surprised to learn that the DDA had issued a new 23 page Self-Directed Services Comprehensive Policy and a new 115 page Self-Directed Services Manual. The DDA announced that this manual would take effect on Thursday, November 7, 2024, just 13 days later! This time period exactly straddled the Presidential election on November 5, 2024, thus creating a massive disruption just when our entire nation was intensely focused on our quintessential American passion: voting.

As you may recall, the Maryland General Assembly was inundated with calls and emails from constituents during this important time period, and finally a conference call was organized for November 4, 2024, just one day before the election!

It also turned out that the DDA had included an erroneous provision in the Policy Manual that attempted to tap into Participants' ABLE accounts and Special Needs Trusts. This attempt was a violation of law, and the Maryland ABLE people contacted them within a day to tell them that this was illegal, hence that provision was removed. There should have been a 90-day comment period for these documents.

This is a sad track record that shows disrespect not only for the Participants, but for the other important partners in Self-Direction such as the Support Brokers, Coordinators of Community Services, Financial Management and Counseling Services (FMCSs), vendors, and even for the Maryland General Assembly.

For these reasons, please support this bill. The DDA should be required to provide advance notice of proposed changes and offer a 90-day comment period. Further changes should not be implemented until this procedure has been completed.

However, I would like to request that more information be required of the DDA prior to the 90 day comment period:

The DDA should provide information about whatever "problem" it has uncovered and why their "change" is the "solution" to the "problem". This would include:

- A specific description of the "problem"
- A detailed description of a consultation process to include all interested parties in addressing the "problem"
- Serious collaboration with all interested parties to continue until all facts relating to the issue are available, including:
 - Data describing the extent and frequency of the "problem"
 - A description and explanation of the "solution" the DDA wishes to implement
 - Consideration of "solutions" developed by other parties
 - Data describing whether this "problem" has occurred in other states, to what extent, and how well this "solution" addressed the problem in other states
 - A cost-benefit analysis of the costs, in both time and money for all parties, involved to implement this "solution"
 - Description of a trial period to see if the "solution" actually solves the "problem"

- Full and complete consideration of all these points should be completed and published before any changes are implemented.
- The implementation process should be carefully designed and monitored to ensure the “solution” actually does resolve the “problem.”

Furthermore, the DDA should focus on stabilizing the rules and regulations so Participants and families can plan for the future. The DDA regulations are hundreds of pages long. The Policy Manual is 100+ pages long. There should be no more specious changes. Participants need the rules to be stable because we families are trying very hard to figure out long term care for our Adult Children. Families have many important decisions to make that may involve huge sums of money, such as whether to move, whether to buy a different type of property, whether to buy a certain type of vehicle, etc.

If the rules and regulations change constantly, we cannot make decisions, and we cannot take action. If we risk taking an action based on one set of rules, we might find our innocent Participants in big trouble after yet another unannounced rule change. This is untenable and cruel.

Families want to provide for their Adult Children to the extent possible, or at least be able to start the planning process. At the present time, this is impossible.

In conclusion, please support this bill. Please support the goals of Participants and their families to have stability and transparency for their programs in the short term, and the ability to plan for the long term.

Thank you for your consideration.

Sincerely,

Martha Gabler

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