



DEPARTMENT OF HEALTH

Wes Moore, Governor · Aruna Miller, Lt. Governor · Meena Seshamani, M.D., Ph.D., Secretary

March 17, 2026

The Honorable Heather Bagnall
Chair, House Health Committee
240 Taylor House Office Building
Annapolis, MD 21401-1991

RE: House Bill 1593 – Developmental Disabilities Administration - Self-Directed Services Manual - Public Comment – Letter of Support with Amendments

Dear Chair Bagnall and Committee Members:

The Maryland Department of Health (the Department) respectfully submits this letter of support with amendments for House Bill (HB) 1593 – Developmental Disabilities Administration - Self-Directed Services Manual - Public Comment. HB 1593 establishes a new requirement that the Developmental Disabilities Administration (DDA) provide at least 90 days of public comment before making any changes to the Self-Directed Services (SDS) Manual.

The Department respectfully presents amendments that would instead require the Department to adopt regulations for the Community Pathways Waiver program. Existing regulations for DDA services are a part of Medicaid regulations under [COMAR 10.09.26](#) and have not been updated since 2013. Since then, the Community Pathways Waiver has been renewed twice (2018 and 2023) and amended 14 times with the Centers for Medicare and Medicaid Services (CMS), including the most recent amendment implemented beginning in October 2025. As such, DDA's regulations should be updated to reflect the changes that have taken place in the waiver over the last 13 years.

The Department has been planning comprehensive regulatory updates for DDA regulations, including creating a new subtitle specifically for DDA Waiver Services. The planned regulatory revisions will also include an entire chapter focused on Self-Directed Services. The Department believes these amendments will accomplish the intent of the legislation by providing significant stakeholder and advocate input in the Department's procedures through the State's existing regulatory process, governed by the Administrative Procedures Act in State Government Article, Title 10, Subtitle 1.

The SDS Manual is an operational guidance document for DDA's SDS delivery model. It is intended as a resource to help people involved with SDS—including participants, families, Coordinators of Community Services, and DDA regional staff—understand the ways participants can receive services and DDA's guidance and standards related to those services. It does not

establish law or regulation.¹ For these reasons, the Department believes that the proposed regulatory process would be a more meaningful opportunity for stakeholder and advocate input.

As part of the proposal, the Department is committed to a thorough, transparent regulatory process with significant stakeholder engagement. Prior to submitting any regulations to the Joint Committee on Administrative, Executive, and Legislative Review, the Department will share draft regulatory text with stakeholders, advocates, and other interested individuals through a new dedicated webpage and targeted stakeholder meetings of existing DDA workgroups. Following submission to AELR and publication in the Maryland Register, these regulations would have a 30-day formal comment period in accordance with [State Government Article, §10–111\(a\)\(3\), Annotated Code of Maryland](#).

For these reasons, the Maryland Department of Health respectfully supports HB 1593 as amended. If you would like to discuss this further, please do not hesitate to contact Meghan Lynch, Director of Governmental Affairs at Meghan.Lynch@maryland.gov.

Sincerely,



Meena Seshamani, M.D., Ph.D
Secretary of Health

¹ More information can be found in DDA's October 2025 report describing the history and impact of the SDS Manual. See, Maryland Department of Health, Developmental Disabilities Administration. (2025, Oct.). *Self-Directed Services Manual - Impact*. [https://mlsd.ent.sirsi.net/client/en_US/default/search/detailnonmodal/ent:\\$002f\\$002fSD_ILS\\$002f0\\$002fSD_ILS:56857/one](https://mlsd.ent.sirsi.net/client/en_US/default/search/detailnonmodal/ent:$002f$002fSD_ILS$002f0$002fSD_ILS:56857/one).

AMENDMENTS TO HOUSE BILL 1593

(First Reading File Bill)

On page 3, strike in their entirety lines 2 through 12, inclusive, and substitute:

“THE SECRETARY SHALL ADOPT REGULATIONS FOR THE COMMUNITY PATHWAYS WAIVER, INCLUDING REGULATIONS PERTAINING TO THE DELIVERY OF SELF-DIRECTED SERVICES.”

Rationale: The Department suggests requiring the adoption of regulations for the Community Pathways Waiver program. This amendment would ensure that the Department undertakes a process to update and modernize DDA’s regulations, which would include opportunities for meaningful public and stakeholder input through the State’s existing regulatory process, governed by the Administrative Procedures Act in State Government Article, Title 10, Subtitle 1. Stakeholders would have the opportunity to provide input on changes across all DDA waiver services, including, but not limited to, those provided under the self-directed services delivery model.