

Chair, Vice Chair, and Members of the Committee,

Thank you to Del. Guyton, and the sponsors of SB0583 in the Senate for these bills.

I am Cody Stevens and I am speaking on behalf of Shari Dexter and the leaders of Concerned Citizens of Self-Direction Maryland, parents of participants in Self-Directed Services. Shari and I are representatives on the MIDSEC Committee.

You may recall we sat before legislators last year following the release of the Self-Direction Manual and proposed budget reductions. Here we are again.

Since then, the Self-Direction Manual has undergone four additional editions, expanding from 116 to 192 pages, often effective immediately or within days.

Last summer, DDA released a 623-page Community Pathways Waiver Amendment with only 30 days for comment. More than 260 recommendations were submitted; roughly 40 were approved.

Earlier this month, 28 cross-model policies totaling 291 pages were posted to PolicyStat as “effective upon posting.”

Then days ago, came the DDA’s waiver amendment proposal number 4, adding another 52 to comment before April 1.

Together, these total approximately **1,727 pages of documented policy change in one year**, which averages the need to read and thoroughly comprehend approximately five pages per day with no exceptions since we last appeared before you.

That does not include procedural changes that surfaced without formal notice.

Families and providers are not policy analysts. Yet they are expected to interpret and operationalize dense, highly technical changes almost overnight, while handling their family affairs, and their duties as a direct caregiver to their participant.

This is not collaboration. It is unilateral implementation.

As MIDSEC members and as parents of Luke and Timmy, we have participated in advisory processes in good faith.

Yet major decisions surrounding the \$155 million in proposed cuts have advanced without consensus and without meaningful incorporation of stakeholder input.

Each of the revisions, there is required staff time, legal review, administrative restructuring, and in some cases litigation and corrective amendments.

In a year defined by a \$155 million savings conversation, it is fair to question whether the fiscal cost of repeated policy shifts have been fully considered.

HB1593 is a necessary safeguard. We respectfully request that it be amended to require **90-day public notice and opportunity for comment whenever DDA changes the terms, scope, or delivery of services, whether through regulation, policy, practice, or procedure; at any time.**

We also urge that proposed changes be described in plain language so families can understand them before they are expected to comply with them.

Notice is not obstruction. Transparency is not a threat. Accountability is not opposition.

When policy can change overnight without notice, stability turns into uncertainty, and uncertainty undermines safety, planning, and trust that is expected and required.

Marylanders with disabilities deserve governance that is predictable, transparent, and participatory.

HB1593 restores that standard.

We respectfully urge a favorable report with this amendment. Thank you.