

## **HB1593**

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

**POSITION:** Favorable with Amendments

**COMMITTEE:** Health Committee

**ORGANIZATION:** Self-Directed Advocacy Network of Maryland (SDAN)

**SUBMITTED BY:** Jessica Gallatin, Representative of SDAN

**DATE:** March 17, 2026

### **TESTIMONY**

Chair and Members of the Health Committee:

The Self-Directed Advocacy Network of Maryland (SDAN) respectfully submits this testimony in support of House Bill 1593 (HB1593) with amendments.

SDAN is a statewide advocacy organization committed to protecting and advancing participant choice, control, flexibility, and the long-term sustainability of self-directed services and supports in Maryland. Our work centers the experiences and rights of people who rely on Maryland's developmental disabilities service system and the teams that support them.

HB1593/SB583 takes an important step toward transparency by requiring public notice and a minimum 90-day public comment period before changes are made to the Self-Directed Services Manual. SDAN strongly supports this intent.

#### **Why SDAN Supports SB583/HB1593**

Policies contained in the Self-Directed Services Manual are not merely operational guidance; they influence real-world access to services, participant autonomy, and the consistency of service delivery. Changes to definitions, requirements, or interpretations can have wide-reaching impacts on individuals and families who depend on stable, predictable rules.

#### **Why Amendments Are Necessary**

SDAN urges amendments because transparency protections should not depend on where policy language is housed.

Maryland's developmental disabilities service system operates through two parallel service delivery models (traditional and self-directed) that are intended to provide comparable services and supports. Yet, policy guidance for these models is not consistently handled:

- The Self-Directed Services Manual was described as a consolidation effort, bringing policy into one accessible reference point, yet its implementation has, at times, contributed to major disruption when policies were not aligned, clear, or workable in practice.
- The Self-Directed Services Manual has also become a place where implementation can be more prescribed, limiting the flexibility that is otherwise preserved in the traditional model, where

provider organizations are typically permitted to determine implementation design within policy parameters.

- Most importantly, recent updates to PolicyStat and other guidance sources have occurred with little or no public visibility (sometimes seemingly “overnight”) despite the fact that such changes can redefine terms, shift access thresholds, and move expectations for services already in operation.

When rules and definitions change without notice and stakeholder engagement, it undermines trust, disrupts planning, and can function as a “moving goal post” for participants and their teams. Changes of this significance must be balanced, transparent, and public; not quietly implemented through whichever platform is used at the time.

### **SDAN’s Requested Amendments**

SDAN requests amendments to ensure the transparency and public comment requirements apply to all policy vehicles that govern services under the Developmental Disabilities Administration, including but not limited to:

1. PolicyStat (the statewide archive for DDA-related policies), and
2. Any other formal policy guidance used by the Administration that affects eligibility, access, definitions, service parameters, or implementation requirements.

SDAN also recommends amendments to require:

- Public posting and broad dissemination of proposed changes;
- Accessible notice (plain language and accessible formats);
- Publication of a summary of public comments received and how they were considered; and
- Clear standards to distinguish “substantive” policy changes from administrative or technical edits.

### **Conclusion**

SB583/HB1593 is a strong step toward rebuilding transparency and accountability in how policies are changed within Maryland’s developmental disabilities service system. With amendments extending these protections to PolicyStat and all formal policy guidance used by the Administration, SB583/HB1593 can ensure consistency, fairness across service models, and meaningful public participation.

For these reasons, SDAN respectfully urges the Committee to issue a Favorable Report with Amendments on HB1593.

Respectfully submitted,

Jessica Gallatin

Board Member, Self-Directed Advocacy Network of Maryland (SDAN)

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