

Testimony on the Importance of an Adequate Public Comment Window for Changes to DDA Policies and Manuals (SB0583/ HB1593)

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 and chaos they create multiple times each year must be astronomical.

I also request that DDA be required to limit the amount of changes they make per year. The amount of changes each year is too much for a non intellectually disabled person to keep up with. These manuals are over 200 pages long. Policies get changed en masse at one time. Then we are told in an email buried at the bottom. If DDA is sending out multiple emails per month, as are the FMCS', as are the CCS', how is this group of people supposed to be able to keep up with that? The stakeholders that utilize this agencies services need time to be able to adapt. This destabilizes these participants which happens multiple times through the year.

DDA must also actually consider the feed back by collecting data and posting the results PUBLICLY. Otherwise, DDA will continue to pay lip service and holding meetings to check a box without actually listening to stakeholders. DDA needs to remember that their job/ role is to serve the people, not act as an authoritarian agency of unelected bureaucrats.

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,

A handwritten signature in black ink, appearing to be 'Kl' with a large loop at the end.A handwritten signature in black ink, appearing to be 'H' followed by a horizontal line.

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