



People On the Go Maryland

In the House - Hearing 3/17 at 1:00 p.m.

TESTIMONY ON HB 1593

Sponsored by Delegate Guyton

Developmental Disabilities Administration - Service Manuals - Public Comment

POSITION: FAVORABLE WITH AMENDMENT

Testimony Written by Mat Rice on Behalf of People on the Go Maryland

To the Honorable Members of the Health Committee:

People on the Go Maryland respectfully submits this testimony regarding House Bill 1593, sponsored by Guyton. We recommend a FAVORABLE WITH AMENDMENT recommendation to strengthen this bill's positive impact on the developmental disability's community.

About People on the Go Maryland:

Our mission is to promote advocacy and civil rights throughout the state. We are a self-advocacy organization made up entirely of people with developmental disabilities. We believe strongly in the principle of 'Nothing About Us Without Us' - meaning that people with disabilities must be meaningfully included in all decisions that affect our lives, our services, and our communities.

Statement of Support:

People on the Go Maryland supports House Bill 1593 and believes it represents an important step forward in promoting transparency, accessibility, and meaningful participation for people with developmental disabilities in the policymaking process. Public comment opportunities are essential because they ensure that decisions affecting our lives are informed by those who experience their impact firsthand.

The Need for Amendment:

While we strongly support the intent of this bill, we respectfully recommend an amendment to ensure that ALL people with developmental disabilities benefit equally from its provisions, regardless of how they receive their services.

Currently, House Bill 1593 only requires public comment for changes to the Self-Directed Services Manual. According to the Maryland Developmental Disabilities Administration, there are two primary service delivery models:

- Self-Directed Services - where individuals have employer and budget authority over their services
- Agency-Directed (
- Provider supported) Services - where provider agencies coordinate and deliver services on behalf of individuals

Additionally, many people receive supports through specialized waivers and programs including residential habilitation, day habilitation, supported employment, and community living options. All individuals deserve equal opportunity to participate in shaping the policies that govern their services.

PROPOSED AMENDMENT TO HOUSE BILL 1593:

On page 3, line 2, strike 'SELF-DIRECTED SERVICES MANUAL' and substitute 'SERVICE MANUALS, POLICIES, PROCEDURES, AND WAIVER AMENDMENTS OF THE DEVELOPMENTAL DISABILITIES Administration.'

On page 3, line 3, after 'ADMINISTRATION' insert ', INCLUDING BUT NOT LIMITED TO ALL MANUALS, POLICIES, PROCEDURES, AND GUIDANCE DOCUMENTS RELATED TO BOTH SELF-DIRECTED AND PROVIDER-DIRECTED SERVICES.'

On page 3, line 6, strike 'THE SELF-DIRECTED SERVICES MANUAL' and substitute 'ANY SERVICE MANUAL, POLICY, PROCEDURE, OR GUIDANCE DOCUMENT.'

ADDITIONAL CLARIFYING LANGUAGE:

After the amended subsection, add the following:

'For purposes of this section, policies, procedures, manuals, and waiver amendments includes any written guidance, operational instructions, rate-setting methodologies, eligibility criteria, and procedural requirements that directly impact the delivery of services to individuals with developmental disabilities, regardless of the service delivery model utilized.'

PROPOSED PLAIN LANGUAGE ACCESSIBILITY AMENDMENT:

People on the Go Maryland further recommends the following additional language to ensure that all documents are fully accessible to the individuals they are intended to serve:

'(1) PLAIN LANGUAGE REQUIREMENT. The Developmental Disabilities Administration shall provide plain language versions of all policies, procedures, manuals, and waiver amendments alongside the original technical/legal versions to ensure meaningful participation in the public comment process by individuals with developmental disabilities.'

'(2) DEFINITION OF PLAIN LANGUAGE. For purposes of this section, plain language means communication that is designed so that readers can:

- (A) Find the information they need;
- (B) Understand what they find the first time they read or hear it; and
- (C) Use the information to understand their rights, make decisions, and take action regarding their services.'

Plain language shall include: short sentences using common, everyday words; active voice; clear organization with headings; visual supports such as bullet points, numbered lists, and examples; and explanations of technical terms.

'(3) USE OF ACRONYMS AND ABBREVIATIONS. Plain language does not require the complete elimination of acronyms. Documents shall ensure:

- (A) All acronyms are defined in full upon first use, with the acronym in parentheses;
- (B) A glossary of acronyms and key terms is included with all policies and guidance documents; and
- (C) Commonly recognized acronyms (e.g., DDA, CCS, SDS) may be used after initial definition.'

Research-Based Justification for Plain Language and Acronym Provisions:

These provisions are grounded in federal law and supported by peer-reviewed research. The Plain Writing Act of 2010 mandates that federal agencies use 'clear government communication that the public can understand and use.' Research published by RTI International demonstrates that creating effective materials for adults with disabilities requires language at approximately a sixth-grade reading level with relevant, concrete examples that connect to real-life situations.

Regarding the strategic use of acronyms, research published in the Global Journal of Intellectual & Developmental Disabilities shows that acronyms serve as effective mnemonic devices for people with intellectual and developmental disabilities. Studies demonstrate that properly introduced acronyms can improve information recall by up to 200%. Familiar acronyms like 'DDA' become valuable reference points that reduce cognitive load while maintaining technical precision.

What This Amendment Means in Plain Language:

Right now, the bill only lets people comment on changes to the self-directed services manual. Our expanded amendment would mean:

- People who get help from agencies would have the same rights as people who self-direct
- People in group homes and day programs would get to comment on policy changes
- People receiving employment services, respite care, or other DDA support would be heard
- Changes to waiver programs would require public input before implementation
- ALL policies affecting people's services would go through public comment
- DDA would write easy-to-understand versions of all important documents

Everyone deserves a voice, no matter how they receive their supports.

A Note About Acronyms:

When we say documents should be in 'plain language,' we do NOT mean getting rid of all acronyms. Some acronyms actually help people understand and remember information better. For example, acronyms like 'HOMES' help people remember the Great Lakes (Huron, Ontario, Michigan, Erie, Superior). Similarly, 'DDA' is much easier to say and remember than 'Developmental Disabilities Administration.' Research shows that when acronyms are clearly taught and explained, they can help people remember important information better. What matters is that acronyms are always explained the first time they appear, and that a complete glossary of acronyms is included in every document.

Why This Expanded Amendment Is Essential:

Policies, procedures, and waiver amendments can have just as much impact on people's lives as service manuals. Furthermore, requiring plain language versions of all documents ensures that the public comment process is truly accessible to all individuals with developmental disabilities, not just those with strong reading skills or professional advocates.

IMPORTANT:

It is the position of People on the Go that even if the amendment is not adopted, the bill should pass as originally drafted. HB 1593, with or without our proposed amendment, represents meaningful progress toward greater transparency and public participation in the policymaking process.

People on the Go Maryland hopes for the Health Committee to adopt this amendment and issue a favorable report on House Bill 1593.

Respectfully submitted,

Mat Rice

On Behalf of People on the Go Maryland

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