

Dear Delegate

I am writing to you about HB1593, requires the Deputy Secretary for Developmental Disabilities

- to provide notice to the public before making changes to the Self-Directed Services Manual;
- to require the Deputy Secretary to receive and consider comments on the proposed changes from the public for at least 90 days after the date on which the notice is provided;
- and prohibiting the Deputy Secretary from adopting the proposed changes until the public comment period has ended.

From personal experience as the parent of 2 children with disabilities, I can tell you that the way the DDA has rolled out and implemented policy changes, procedures, changes to the waivers over the past 3 years has inflicted tremendous stress and anxiety on disabled individuals, their parents and their service providers.

- DDA policy changes come one after the other (there's been so many of them in the past 3 years),
- The instability and upheaval experienced by support workers amount to work place abuse and cause many supporters to leave the field.
- We are all experiencing shortage of skilled, qualified direct support persons, excessive, irrational billing regulations are causing Support Brokers and Nurses to leave in droves. This in particular, is gutting Self-Direction Program which, by DDA's own regulations, require Support Brokers and Nurses for many Self-directing individuals
- Just in 3 years, this constant roll-out of changes has been to erode Self-Direction Program and remove budget authority and choice from disabled individuals.

Furthermore, more relevant to this bill,

- Language used in the policies is opaque and prevents ordinary people from understanding what is going on,
- DDA webinars explaining these changes are verbatim quotations from the proposed opaquely written policy manuals,
- DDA webinars, which ostensibly explain the proposed changes, come a week to 10 days **after** the comment period begins which leaves very little time for working people, individuals with disabilities and their supporters to provide meaningful, written feedback,
- Public feedback is left unanswered and ignored in the adoption of proposed changes,
- Public feedback is distorted and misrepresented in Waiver Amendment applications;

Given all this, we ask that DDA provide sufficient notice to individuals who would be impacted by changes, and the people and entities that provide the necessary supports. **We suggest that timely notice not just apply to the self-directed services manual, but also policies, procedures, waiver amendments, etc., that relate to both models of service under DDA, AND that changes are accompanied by a plain language guide**, so people may have a greater opportunity to understand what is proposed and what the changes will do.

This would be great way for legislature to begin to exert some oversight over DDA.

Kind regards,

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