



**VIA EMAIL**

June 6, 2025

**To: Members of the Senate Intergovernmental Operations Committee**

**RE: Senate Bill 657, Removing Regulatory Barriers for Housing and Work Opportunities for Individuals with I/DD**

Disability Rights Pennsylvania (DRP) is the federally mandated, state designated Protection and Advocacy (P&A) system for persons with disabilities in Pennsylvania, and it has been providing legal and advocacy services to Pennsylvanians with disabilities for over 45 years. DRP works to ensure that individuals with disabilities are able to live the lives they choose, free from abuse, neglect, discrimination and segregation. DRP's clients include children and adults with disabilities across Pennsylvania who receive or are in need of services administered by the Department of Human Services so that they can live and work in the community.

The Intellectual disability system is complex, serving tens of thousands of people with varying needs and desires. While improvements should continue to be made to the system, we are concerned that this bill is the wrong approach. **We write today in opposition to Senate Bill 657.**

**Group Home Size Limitation:** The current limits on sizes for group homes is not random. The size limitation has been in place for over 25 years in response to issues in getting group homes opened. At the time the rules were put into place, human services providers had difficulty in opening group homes when municipalities were rejecting applications for NIMBY issues and concerns about compliance with local regulations. The four person limitation was implemented as a way to ensure that new homes could be open with less pushback from municipalities so that more people could be moved into the community. This change has proven successful, with the amount of people being served in the community expanding over time.

**ODP Regulations and CMS Final Rule:** The regulations that govern ID/A services were developed over a five year period. They are the result of robust stakeholder engagement, and while no perspective got all of the changes that they sought it is clear in reviewing the comments submitted to the IRRC that all perspectives respected the process.

ODP and the stakeholder community discussed and negotiated on how to implement the Final Rule into the regulations. This was not done by ODP in a vacuum. Some advocates wanted more stringent rules, some preferred less stringent rules, and the regulations are the result of compromise. The Rule also allows states to implement the Rule in a way that works locally. States have adopted different approaches based on what is best for their state. If Pennsylvania wants a discussion about changing the approach, then robust stakeholder engagement must happen again. These changes should not occur through legislation and without hearing from a variety of perspectives.

**Threats to Medicaid:** Finally, we note that we are at a pivotal moment regarding Medicaid funding. There are substantial proposed cuts to Medicaid funding that would impact Pennsylvania's ability to provide home and community based services. The Medicaid entitlement to services is to provide institutional based care. The proposed cuts to Medicaid would reduce the funding available for Home and Community Based services and supports. Optional services such as employment, person driven services and home and community based long-term supports would not be required to be provided by the state. Pennsylvania will need to determine what services will continue to be available and who will be eligible. Long-term supports and services are already managed to allow as many people as possible to participate in services. This is simply not the time to be considering this bill.

For these reasons, DRP opposes the bill. We welcome discussion around these issues and how to serve people with ID/A. Please contact Jennifer Garman us with questions.

Sincerely,

Jennifer Garman  
Chief Executive Officer  
Disability Rights Pennsylvania