



Pennsylvania Advocates and Resources for Autism and Intellectual Disabilities

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Chairman Coleman,

Pennsylvania Advocates and Resources for Autism and Intellectual Disabilities (PAR) is the largest statewide trade association exclusively representing providers of services to individuals with intellectual disabilities and autism. We write to share our comments and concerns regarding Senate Bill 657.

First, we appreciate your interest in exploring solutions that expand options and choices for individuals and families seeking residential and community-based services. For years, PAR has advocated for programmatic and policy reforms to improve the efficiency of the ID/A system and increase access to meaningful service options. With a significant waiting list to be granted a waiver, additional, less-visible waiting lists for waiver services, we must work collaboratively to find ways to serve more individuals.

The ID/A system is highly complex, and its stakeholders are diverse. Crafting policy that works for all individuals within the system is inherently challenging. That's why, when the federal settings rule was introduced, it required a five-year stakeholder engagement process before final regulations were finalized.

Regarding SB 657, we are concerned about the substantial policy shift that would result from completely eliminating Pennsylvania's implementation of the settings rule. While PAR agrees that aspects of the settings rule could be reconsidered, revised, or even repealed to improve service access, we believe thoughtful changes—not wholesale repeal—are needed.

There are meaningful ways to revise existing policy to increase provider flexibility and enhance the delivery of residential services. These could include:

- Increasing the number of small Intermediate Care Facilities (ICFs) for individuals with complex needs
- Adjusting the ratios of living arrangements within buildings
- Increasing the number of affordable non-provider housing options
- Promoting shared staffing models to create more residential options.

PAR would welcome the opportunity to participate in a work group or stakeholder process aimed at encouraging innovation and recommending improvements to state policy. We strongly believe such collaboration is essential to expanding access to residential services. However, we do not

believe that eliminating the settings rule or pursuing a new interpretation of it is the most effective or efficient path forward.

Sincerely,

A handwritten signature in black ink that reads "Mark Davis". The signature is written in a cursive, flowing style.

Mark Davis,
President & CEO