

Public comment for PA Senate Intergovernmental Operations Committee public hearing on Monday, June 9 2025

Good afternoon. My name is Desiree Kameka Galloway, and I appreciate the opportunity to share my expertise in neuro-inclusive community development:

I serve as the lead consultant for Neuro-Inclusive Housing Solutions and have directed the [Autism Housing Network](#) for the past 18 years. Over the years, I have engaged with residents at more than 120 residential communities developed to support adults with intellectual and developmental disabilities (I/DD). I am also the author of [A Place in the World: Fueling Housing and Community Options for Adults with Autism and Other Neurodiversities](#).

The Autism Housing Network documents 57 neuro-inclusive multi-family properties where residents receive HCBS waiver services. Through direct observation and interaction with residents, I have witnessed firsthand how neuro-inclusive housing can transform lives by fostering the emergence of latent independent living skills, giving people confidence from living independently, and overcoming the extreme loneliness so many with I/DD face. Over and over, I've heard how residents have grown in ways that they and their families did not expect. Unfortunately, these housing choices and subsequent outcomes would not be permissible for adults with I/DD who use a waiver in PA.

Neuro-inclusive housing is not just a viable choice, but desperately needed as one of the options to prevent the displacement or homelessness of adults with I/DD. Yes, I have even conducted focus groups of adults with I/DD who were experiencing homelessness – the majority due to the loss of the caregiver. The need for more housing options cannot be understated and regulatory barriers currently impeding such development are, therefore, both unnecessary and counterproductive.

Other states are proactively addressing the housing crisis of adults with I/DD. Florida Housing Finance Corporation has a dedicated funding stream for the development of affordable housing targeting adults with I/DD. At minimum, the property must set-aside 50% of units for adults with I/DD. The Arc Village of Jacksonville Florida sets aside 80% of units for adults with I/DD. Indiana also provides incentives through prioritization points in applications for developers who want to use Low-income Housing Tax Credits. Arizona provides a supportive housing stipend to adults with I/DD who live in neuro-inclusive housing. Colorado provides technical assistance to any landowner who owns or controls a piece of property and would like to explore the development of neuro-inclusive housing.

I am [currently conducting research for the Colorado Developmental Disabilities Council](#) on why Coloradans with I/DD desire intentional communities for adults with I/DD and what policy recommendations can act as guardrails and accelerators for future developments. In the focus groups I have conducted thus far, over 80 self-advocates with a variety of disabilities have participated. Many self-advocates prefer that the *majority* of units be for adults with I/DD or other disabilities because of their experience with discrimination, insufficient support, bullying and

predatory behaviors by others. Residents of *existing* intentional communities in Colorado report that the ability to live among other people with disabilities is profoundly relieving, feels safe, and eliminates the need for constant explanation of their circumstances- their neighbors “just get it.” Based on direct feedback from self advocates, not their families or providers, density limits are a poor policy strategy or metric for promoting integration. Such density limits have proven to be an ineffective measure for promoting integration, as geographic location does not necessarily equate to personal engagement, meaningful relationships, or wide community acceptance.

Federal Medicaid regulations relating to Home and Community-Based Services (HCBS) settings also do not include any restrictions on density of persons with disabilities in a setting for this very reason. Pennsylvania code § 6100.444. [Size of service location] and § 6100.445. [Locality of service location] is a state-imposed limitation that is unnecessary, undesired by many and halts the development of desperately needed housing solutions for adults with I/DD. Moreover, Pennsylvania’s reliance on [redacted federal Medicaid guidance](#)—overturned in 2019 for being overly restrictive and insufficiently outcome-oriented—underscores the problematic nature of these policies, particularly given that only 23 public comments were received on the draft PA State Transition Plan.

Based on nearly two decades of national experience, I have observed that Pennsylvania’s regulations are among the most restrictive impacting HCBS waiver recipients in the country. The current implementation of these policies places the state at considerable risk for future Fair Housing litigation related to discrimination against individuals with disabilities. In contrast to PA, nearly every other state adheres to federal requirements without imposing additional state-specific restrictions that limit where and how people with I/DD may reside in unlicensed housing settings. While the intentions behind these density limits may have been positive, their implementation has proven to be counterproductive. I respectfully urge the removal of sections § 6100.444 and § 6100.445 from the Pennsylvania Code. This change is essential to facilitate the development of more housing options that can help prevent the displacement and homelessness of Pennsylvanians with intellectual and developmental disabilities.

Thank you for your attention to this critical matter.