



**CONSORTIUM FOR CITIZENS  
WITH DISABILITIES**

Lance Robertson  
Administrator  
Administration for Community Living  
330 C St, SW  
Washington, DC 20201

June 7, 2019

Dear Administrator Robertson:

The undersigned members of the Consortium for Citizens with Disabilities (CCD) write to express our concern over the Notice Statement on the reorganization of the Administration for Community Living (ACL) published in the Federal Register on May 9. The Consortium for Citizens with Disabilities (CCD) is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of children and adults with disabilities in all aspects of society.

We believe the stated goal of the proposed reorganization to “improve efficiency and effectiveness of the organization; strengthen infrastructure; and improve the connections between the organization and its stakeholder, grantees and consumers at the national, state and local levels” may not be advanced by many of the plan’s elements. In fact, we believe that some parts of the plan could have the opposite effect.

**Authority of Disability Programs**

Several important changes would be made to programs serving the disability community. The plan appears to downgrade the Administration on Intellectual and Developmental Disabilities to the Office of Intellectual and Developmental Disability Programs and the Independent Living Administration to the Office of Independent Living Programs. It would also split the administration of the four Developmental Disabilities and Bill of Rights Act (DD Act) programs – the University Centers for Excellence in Developmental Disabilities (UCEDDs), Developmental Disabilities (DD) State Councils, Protection and Advocacy (P&A) agencies, and Projects of National Significance (PNS) – between two new offices. The UCEDDs and DD Councils would fall under the apparently downgraded Office on Intellectual and Developmental Disability and the P&As and PNS programs would be placed under a new Office of Disability Services Integration. No such comparable changes are proposed for programs serving the aging community. This imbalance does not adhere to the parity for aging and disability programs that has been promised.

**Collaboration**

The DD Act’s requirement for its programs to collaborate at the state and local levels to advance their collective roles was clearly intended to ensure efficiency and effectiveness of these programs. They are

charged to advocate, educate, and train policymakers and the service delivery system to accomplish positive systems change in order to “promote self-determination, independence, productivity, and integration and inclusion in all facets of community life,” and should work together as envisioned in the law.

DD Act partners have been collaborating effectively for decades at the state and local level. For instance, DD Councils, P&As, and UCEDDs work together to increase the quality and availability of Medicaid home and community-based services (HCBS). In Wisconsin, they helped to create a new Medicaid waiver that greatly reduced the risk of children with disabilities being forced into institutional placements; In Pennsylvania, they developed an “End the Waiting List” project; and in Iowa, they worked together to create a Money Follows the Person program that helps people with developmental disabilities to move from institutional placements back into the community. Such collaboration has been mirrored at the federal level through a number of efforts, including ensuring personal safety in group homes for persons with developmental disabilities and addressing the service needs of children exposed in utero to opioids. We believe that ACL should actively support the continued collaboration of DD Act partners by retaining their administration under a single office or agency.

Given the Administration’s proposed funding cuts for the DD Act and Independent Living programs in the Fiscal Year 2020 President’s Budget Request below, coupled with the proposed elimination of 9 FTEs in ACL despite numerous unfilled vacancies, we are very concerned that ACL’s proposed reorganization could limit the effectiveness of programs for people with developmental disabilities and their families.

- DD state Councils -26%
- P&A -5%
- UCEDDs -19%
- PNS -92%
- Independent Living -6%

### **Expertise**

The intent of the transfer of the Independent Living Program from the Rehabilitation Services Administration (RSA) to the Administration for Community Living with the 2014 reauthorization of the Rehabilitation Act (in the Workforce Innovation and Opportunity Act) was to strengthen the national Independent Living network and better allow the program to fulfill its goals of independent living, consumer control, and inclusion. To that end, the law requires that the Director of the Independent Living Administration must be an individual with “substantial knowledge of independent living services.” The apparent downgrading of the Independent Living Administration to the Office of Independent Living Programs, coupled with the combining of the Director of the ILA position with the Commissioner of the Administration on Disabilities into one position, virtually ensures that the intent of the law cannot be met. We are very concerned that the lack of a full-time director for the ILA will have a very negative impact on the Independent Living Program.

As the principal agency in the department designated to lead aging and disability programs, ACL must have sufficient resources, support, and clarity in its goals to be successful in this role and avoid unnecessary disruption. We call on ACL leadership to work with stakeholders to safeguard necessary supports and services and advance community living. We look forward to meeting with you at your earliest convenience to further discuss our concerns.

Sincerely,

American Association on Health and Disability  
American Association of People with Disabilities  
American Network of Community Options and Resources  
American Physical Therapy Association  
Autistic Self Advocacy Network  
Autism Society of America  
American Therapeutic Recreation Association  
Council of State Administrators of Vocational Rehabilitation  
National Council on Independent Living  
National Disability Rights Network  
National Down Syndrome Congress  
RespectAbility  
TASH  
The Advocacy Institute  
The Arc of the United States  
United Spinal Association