



Alliance for the Betterment of
Citizens with Disabilities

Empowering People: Providers Shaping Policies

PUBLIC HEARING & PUBLIC COMMENT

**ALLIANCE FOR THE BETTERMENT OF CITIZENS WITH DISABILITIES (ABCD)
EARLY INTERVENTION ASSOCIATION (EIPA)**

**NEW JERSEY EARLY INTERVENTION SYSTEM
PROPOSED NEW RULES: N.J.A.C. 8:17-19**

SEPTEMBER 9, 2025

The Early Intervention Provider Association of ABCD appreciates the opportunity to provide testimony as to the necessity for and the content described in the “new proposed rules” identified in N.J.C.A. 9:17-19.

The historical documentation and alignment with the annual application for Federal Part C funds submitted to the United States Secretary of Education in 34 CFR 303.208, offers a clear path of regulatory authority and accountability in the distribution of Federal Part C resources.

Regarding the new rules proposed in Subchapter 19 of N.J.A.C. 8:17, the membership of EIPA fully supports the adoption of the following:

- N.J.A.C. 8:17-19.1 Procedures for Public Notice, Public Hearing, and Public Comment for all new or revised policies or procedures
- N.J.A.C. 8:17-19.2 Procedures and standards for a public hearing on new or revised policy, procedure or rule
- N.J.A.C. 8:17-19.3 Public comment procedures on a proposal to implement a new or revised policy or procedure
- N.J.A.C. 8:17-19.4 Public notice of availability for IDEA Part C funding

In addition, EIPA has reviewed the required Impact Statements (Social Impact, Economic Impact, Federal Standards Statement, Jobs Impact, Agriculture Industry Impact, Regulatory Flexibility Statement, Housing Affordability Impact Analysis, Smart Growth Development Impact Analysis, and Racial and Ethnic Community Criminal Justice and Public Safety Impact) and respectfully withholds any contrary comments or suggestions to the Impact Statements.

The ABCD Early Intervention Provider Association (EIPA) has been in existence since 2006 and has been a tireless advocate for improving the Early Intervention System (EIS) and making recommendations to the NJDOH that foster provider sustainability in a competitive and changing environment. The fourteen member organizations of ABCD EIPA operate independent of one another and collectively provide services to more than 60% of the total number of children served in the State of New Jersey.

