



Alliance for the Betterment of  
Citizens with Disabilities

---

**Empowering People: Providers Shaping Policies**

Legislation which has shortcomings in design, application, outcome, fairness and scope

S3752/A5637 establishes certain governance and service standards of DDD providers.

Flawed and impractical.

By requiring independent volunteers with no fiduciary responsibility, duty of loyalty or altruism to be members of an agency board of directors and audit committees, an effort to increase transparency can amount to exposure for both the agency and the volunteer. In addition, where would agencies find what amounts to hundreds of volunteers statewide to perform these functions?

Short sighted.

Many agencies, particularly the small and medium sized, will be negatively impacted by limiting funds earmarked for indirect costs, overhead and retention because they are less able to operate at internal economies of scale. In addition, these agencies will be less able to save or borrow enough money to expand and grow their programs and services, stunting development. "It seems like the state's goal is to have only a handful of agencies provide services across the state."<sup>1</sup>

Counterproductive and biased

Under FFS our industry has transitioned from medium to high risk. To remain competitive, agencies' executive salaries are based on published salary guides. Capping salaries of DDD providers will mean many will be paid less than what they are worth. Because executive talent (like nursing, direct care, and physical, occupational and speech therapy) is transferable, we risk staff departure to other human services and health care sectors which are not subject to the cap. If the state is wedded to a cap, they should instead consider a level playing field by handicapping all Medicaid providers in DHS, DCF and DOH, not just those which provide DDD services and support.<sup>2</sup>

Ineffective.

Recreating statute which already exists in statute, will not force bad actors to comply with laws governing Workmen's Comp, insurance coverage, board liability, and nepotism.

November 6, 2025

---

<sup>1</sup> ABCD member comment to ED.

<sup>2</sup> This statement is not meant to be construed that ABCD is in support of salary caps for human and health care service sectors. We use it merely to highlight that the proposed policy is biased against DDD service providers.