



Alliance for the Betterment of
Citizens with Disabilities

Empowering People: Providers Shaping Policies

Assembly Health Infrastructure Committee

Testimony on A2705

For Discussion Only

Respectfully Submitted September 14, 2026

Good morning, Chairperson Stanley, Vice Chairperson Speight and members of the Assembly Health Infrastructure Committee. My name is Cathy Chin, and I am the Executive Director of ABCD, a trade association representing over 60 agencies which provide services in the community for individuals with intellectual and developmental disabilities. Thank you for this opportunity to discuss the policy of requiring certain group homes to install electronic monitoring devices in common areas. Since most of you are relatively new to this issue, I am very grateful for having the opportunity to provide essential information to ensure understanding in the matter at hand.

History

Since the summer of 2019, the policy of cameras in group homes has been discussed, written about and testified too; exposing the depth of the deadlock on the proposed compromise of a compromise. The solution is not to tear up the current compromise but to renew it.

Home and Community Based Services for individuals with intellectual and developmental disabilities is rooted in the disability rights movement, not in the hierarchical medical model of treatment. Civil rights include not only ensuring safety and health, but physical access, freedom of expression, choice and thought as well as the right to privacy, education, and work. The mission of our agencies is to attain all the above.

Common areas in private homes are neither public spaces open to the public nor institutional settings, they are homes where a degree of individual and communal privacy is to be expected and protected in the same manner as any home in the community.¹

¹ <https://abcdnj.org/wp-content/uploads/2023/04/Camera-Surveillance-in-Group-Homes.-An-Update.-April-2023.pdf>

As we have been stating for over 6 years and believe it bears constant repeating, there is no definitive evidence that establishes the truth of the claim that cameras in a congregate setting prevent abuse. In fact, there are concerns that they might make people less safe by creating a false sense of security.² Despite cameras in their residences, Bellwether's license for 62 group homes was revoked by the State of NJ in 2019 following extensive reports of abuse, neglect, dangerous staff shortages, and unapproved restraints.

The Current Compromise

In spite of this, NJ regulations continue to permit cameras in licensed group homes (LGH). The agency must have an approved DDD/DHS policy which clarifies provider responsibilities, protects the rights of the individual and the minority, follows best practice guidelines, and neither violates federal policy nor jeopardizes federal funding, unlike the proposed bill and its antecedents. Almost one-third of agencies with LGH have met or are in the process of meeting the strict criteria for cameras in communal areas. Today individuals and their guardians consider this option before choosing a group home, which means that they can make the choice freely, without pressure from housemates or their guardians. There are over 11,000 people living in licensed settings and approximately 1,100 additional beds are projected to come online on FY27/28/29.

Definitive Evidence Must be the Standard for Care and Abuse Prevention

The recent white paper by the NCSA-NJ Chapter contains misleading statements about proof that cameras can deter abuse in our state's group homes.^{3 4} As a result, this paper undermines the integrity of government procedure and decision making and conveys a lack of respect for the policy making process and all like yourselves who take that process seriously and operate in good faith.

A2705 pertains only to individuals with intellectual and developmental disabilities who are assessed as "Tier C and Beyond." This provision implies that while living in licensed group homes individuals who are "Tier C and Beyond" are more vulnerable to abuse than individuals who are in tiers A and B. Please consider that one can just as easily posit that "Tier C and Beyond" may be less likely subjects of abuse in DDD licensed residential settings because they have more eyes-on care. Despite this well-intended qualification, considering the risk of abuse, neglect, and exploitation it may be ill-advised to parse this historically disempowered group of individuals in addition to being an ethically fraught response which may violate the ADA.

We continue to support the current compromise which enables us to manage the need to provide the security and safety individuals require without abandoning the dignity and independence they rightly demand. The current compromise concedes that both groups have

² <https://abcdnj.org/wp-content/uploads/2021/09/Additional-Resources-9-21-ABCD-Position-on-Camera-Surveillance-in-Group-Homes.pdf>

³ *Cameras in Group Homes for People with Disabilities*, June 2026 National Council on Severe Autism- New Jersey Chapter, p.4.

⁴ *ABCD Response to NCSA-NJ Chapter June 2026 White Paper.* www.abcdnj.org/advocacy

weight and standing. Until the data changes, we believe it wrong to allow this one possibly minority position to define policy for everyone else.

To build and maintain cultures of safety, providers must remain vigilant, consistently operationalizing, reinforcing, measuring and validating their prevention policies and efforts. Agencies must protect those in their care while preserving trust in their organizations.

Following are some ideas to improve health and safety without jeopardizing the rights of individuals with intellectual and developmental disabilities.

1. A policy evaluation to determine the effectiveness of the OPIA Report Card in preventing and unearthing actual safety and risk.
2. Give DDD the enforcement authority and the resources to ensure service provider applicants obey all laws, regulations and rules before they are entitled to receive payment for services. This protocol is currently in place for CSOC in DCF.
3. Establish permanent Abuse, Neglect, Exploitation Prevention Best Practices Roundtable in DDD.
4. Reframe the two-year Disability Mortality and Abuse Prevention Review Board into a standing committee.
5. Update the Central Registry statute, to mirror the applicability standards of the Child Abuse Record Information background check (CARI).
6. Update the Stephen Komninos Law to include unlicensed group homes receiving Medicaid funding for services.

Position

This issue represents a philosophical and policy tug of war between safety and liberty. Until the data changes and there is definitive evidence for abuse prevention, we believe it wrong to allow this one possibly minority position to define policy and impinge on the rights and possibly the safety of everyone else.