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October 18, 2021

Reports Clearance Director
3100 West High Rise
6401 Security Blvd.
Baltimore, MD
21235

RE: Docket ID Number [SSA-2021-0029] – Continuing Disability Reviews

To Whom It May Concern:

The Association of Regional Center Agencies (ARCA) represents the network of 21 community-based non-profit regional centers that coordinate services for, and advocate on behalf of, over 350,000 Californians with developmental disabilities. On behalf of ARCA, I wish to express our concerns with the proposed increase of the frequency of Continuing Disability Reviews, and suggest a modification that remains within the intent of this proposal.

People with developmental disabilities are among the many Americans whose lives are improved by benefits provided by the Social Security Act. As with all governmental programs, a variety of oversight mechanisms – at both the state and federal level – ensure that only individuals eligible for benefits receive them. The federal government’s interest in better monitoring benefit recipients’ status so as to avoid benefits being received after eligibility ends is understandable.

However, developmental disabilities are definitionally life-long. There are, of course, degrees of improvement that therapeutic interventions can yield, but the core expectation of a service system interacting with a person with autism, epilepsy, cerebral palsy, or intellectual disability is that this condition is expected to be lifelong. In California, this expectation is even codified in state law.

Given this, there should be no anticipated positive fiscal benefit in more frequent Continuing Disability Reviews. They will only pose an undue burden on individuals and families. In the worst case, this may be a barrier to access, leading otherwise (still) eligible individuals to decline benefits to which they are entitled, and from which they would benefit. Should this proposal be adopted, we urge an exemption for individuals with developmental disabilities, who should remain subject to the current requirements.

If you have any questions regarding our position, please do not hesitate to contact Daniel Savino in our office at dsavino@arcanet.org or (916) 446-7961.

Sincerely,

/s/Amy Westling
Executive Director