

May 8th, 2025

Senate Health, Education, Labor & Pensions (HELP) Committee 428 Dirksen Senate Office Building Washington, DC 20510-6300

Senate Finance Committee 219 Dirksen Senate Office Building Washington, DC 20510-6200

To Chairs Cassidy and Crapo, Ranking Members Sanders and Wyden, and all Members of the Senate HELP Committee and the Senate Finance Committee:

The Collaboration to Promote Self-Determination (CPSD) strongly supports the preservation of and adequate funding for the programs and services within the Administration for Community Living (ACL), as well as the staff necessary for its operation. CPSD recommends the safeguarding of ACL in its entirety because ACL promotes workforce participation for people with disabilities.

#### **About CPSD**

The Collaboration to Promote Self-Determination (CPSD) is an advocacy coalition of organizations including and representing people with disabilities, with a particular focus on those with intellectual/developmental disabilities (IDD), their families, the professionals who support them, and disability service agencies. We have come together to advocate for comprehensive, innovative public policy reform that eliminates barriers to employment and financial security, and promotes opportunities for people with IDD to be able to lead independent, self-determined lives in the community.

## Requests

CPSD urges the Committees to refuse the dismantling of ACL in the congressional budget proposal and in the presidential budget. After the upcoming congressional hearing on the restructuring of the Department of Health & Human Services (HHS), CPSD asks the Committees to schedule follow-up hearings with HHS Chair about the HHS agencies subject to the most concerning restructuring, including ACL, the Administration for Children & Families (ACF), the Centers for Disease Control & Prevention (CDC), and others. At both of these hearings, CPSD and the public deserve answers to the following questions:

- Which ACL programs and services will be overseen by which agency: Administration for Children and Families (ACF), Assistant Secretary for Planning and Evaluation (ASPE), Centers for Medicare and Medicaid Services (CMS), and others?
- How will the leadership guarantee that funds continue to be delivered in a timely manner to ACL grant recipients? Can the HHS Chair guarantee that services and supports to disabled people and older adults will not be disrupted?

- Disabled people include both children and adults. In fact, more than 1 in 4 American adults are disabled, and ACL serves millions of these adults.<sup>1</sup> Given this reality, what is the justification for putting ACL programs and services into the Administration for Children & Families (ACF)?
- What is the plan to ensure effective coordination among ACL programs and the entities with which ACL coordinates, including the Departments of Labor, Education, Health & Human Services, and others?
- Given the insufficient staffing, what is the plan to ensure that these agencies are equipped to take on additional responsibilities under ACL's new organizational structure?
- Who will be the point people overseeing the federal, state, and local coordination of aging and disability services?

# **Overview of ACL's Necessity**

The Administration for Community Living oversees the provision of the following:

- Independent-living services to nearly 250,000 people with disabilities;
- Assistance such as respite care to more than 1.5 million family caregivers;
- More than 261 million meals to older adults.<sup>2</sup>

ACL is necessary because it gives choices to people with disabilities and older adults. ACL ensures this population has a choice in one's own services and supports, employment, and housing. ACL's choice-centered mandate strengthens the pathways toward independence and self-determination for disabled youth, disabled adults, and all older adults.

## **ACL Promotes Workforce Participation of People with Disabilities**

The Administration for Community Living oversees programs and services that help disabled people find and keep a job. Carving out ACL's composite parts into different agencies, freezing its programmatic grants, and implementing reductions in force (RIFs) will have downstream harms to people with disabilities. Specifically, gutting ACL threatens the workforce readiness, employment rates, and livelihood of disabled people. These changes will amount to life-and-death consequences for people with disabilities if Congress does not defend ACL.

### **ACL Leads Interagency Coordination**

The Administration for Community Living leads federal interagency coordination between the Departments of Labor (DOL), Education (Ed), Health & Human Services (HHS), and many other agencies in their joint efforts to oversee the provision of in-home services for disabled and older Americans. For example, ACL leads the Multi-Agency Task Force on Disability Employment, the Pathways to Partnership Initiative, and the Federal

<sup>&</sup>lt;sup>1</sup> CDC finds 1 in 4 adults in US has disability. (2018, August 20). American Network of Community Options and Resources (ANCOR). <a href="https://www.ancor.org/capitol-correspondence/cdc-finds-1-4-adults-us-has-disability/">https://www.ancor.org/capitol-correspondence/cdc-finds-1-4-adults-us-has-disability/</a>

<sup>&</sup>lt;sup>2</sup> Urban Institute: Popkin, S. J., Russell, N., Butrica, B., Ferrante, D.(2025, April 7). Sweeping HHS cuts will put disabled and older Americans' right to live in their communities at risk. Urban Wire.

Partners in Transition.<sup>3</sup> The latter two have a particular focus on preparing youth with disabilities to make the switch from school to the workforce.

### ACL Oversees the Quality of Home and Community-Based Services (HCBS)

The Administration for Community Living develops the quality standards and measures for the provision and accessibility of Home and Community-Based Services (HCBS).<sup>4</sup> HCBS offers the skills training and supports that enable millions of disabled adults to achieve gainful employment. In particular, HCBS services include job coaches, employment support staff, and life-saving habilitation support for activities of daily living, like eating, dressing, transportation, and bathing. Without ACL holding HCBS accountable, the efficiency and cost-effectiveness of HCBS will decline, as will the workforce participation of disabled adults.

### ACL Oversees the Centers for Independent Living (CILs)

The Administration for Community Living awards grants to, as well as monitors and evaluates the performance of, more than 400 Centers for Independent Living (CILs) across the county.<sup>5,6</sup> CILs provide independent living skills training and other services necessary for disabled people to self-direct their lives. Without ACL's supervision and funding of CILs, the independent living infrastructure of this country will crumble, leaving the cost burden on state governments to fill in the gaps.

# ACL Awards Grants to The University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDDs)

There are sixty-eight University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDDs) across the country, with at least one in every state. UCEDDs facilitate information sharing about disability-related best practices between academia and people with disabilities, their families, state and local government agencies, and community providers. The Administration for Community Living awards grants to UCEDDs. One of the UCEDDs is called the Institute for Community Inclusion (ICI), housed with the University of Massachusetts, and ICI is representative of the technical assistance and research that UCEDDs provide thanks to ACL. The Institute for Community Inclusion works directly with disabled people to assist them in career success. ICI also works with state and federal agencies to develop and implement public policies that enhance employment opportunities for people with disabilities, as well as the field research that monitors the outcome of these policies. None of this would be possible without ACL's grants.

<sup>&</sup>lt;sup>3</sup> Administration for Community Living (ACL). (n.d.). Addressing Employment for People with Disabilities. https://acl.gov/programs/youth-transitions/employment

<sup>&</sup>lt;sup>4</sup> Administration for Community Living (ACL). (n.d.). *Improving Quality Services*. <a href="https://acl.gov/programs/strengthening-aging-and-disability-networks/improving-quality-services">https://acl.gov/programs/strengthening-aging-and-disability-networks/improving-quality-services</a>

<sup>&</sup>lt;sup>5</sup> Administration for Community Living (ACL). (n.d.). *Centers for Independent Living*. https://acl.gov/programs/aging-and-disability-networks/centers-independent-living

<sup>&</sup>lt;sup>6</sup> National Council of Independent Living. (2024, November 22). *Independent Living - National Council on Independent Living*. National Council on Independent Living. <a href="https://ncil.org/about/independent-living/">https://ncil.org/about/independent-living/</a>

<sup>&</sup>lt;sup>7</sup> University Centers for Excellence in Developmental Disabilities (UCEDD). (n.d.). Association of University Centers on Disabilities (AUCD). https://www.aucd.org/about-ucedds

<sup>&</sup>lt;sup>8</sup> National Network of University Centers for Excellence in Developmental Disabilities Education, Research, and Service. (n.d.). The Administration for Community Living (ACL). <a href="https://acl.gov/programs/aging-and-disability-networks/national-network-university">https://acl.gov/programs/aging-and-disability-networks/national-network-university</a>

<sup>&</sup>lt;sup>9</sup> UMass Boston. (n.d.). *Areas of Emphasis: Employment*. Institute for Community Inclusion (ICI). https://www.communityinclusion.org/about/areas-of-emphasis/employment/

### ACL Administers Programs within Protection & Advocacy (P&A) Agencies

Protection & Advocacy (P&A) agencies provide disabled people with legal services, remedies, and advocacy in instances of exploitation, segregation, abuse, neglect, violation of rights, and discrimination, which often act as barriers to both physical safety and equal opportunities for employment. ACL administers programs within P&As that operationalize those aforementioned services. For example, there are P&A programs focused on assistive technology, voting accessibility, people with developmental disabilities more broadly, and individuals with traumatic brain injuries. Without ACL's administration of these P&A programs, many people with disabilities will die waiting for legal recourse. Those privileged enough to survive will not be thriving. They will be without the supports necessary to fully participate in their communities. ACL must continue administering and funding P&A programs.

### **Additional ACL Functions**

The Administration for Community Living is responsible for a host of additional programs that promote workforce participation:

- ACL administers technical assistance for the provision of accessible transportation, which is necessary to ensure disabled and older Americans can even arrive at their jobs. 12
- ACL houses the federal government's primary disability research organization, National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR), which establishes best practices for promoting disabled people's participation in their community, including in the workforce.<sup>13</sup>
- ACL is responsible for the State Councils on Developmental Disabilities, which gives power to the states by having them lead the charge of identifying and addressing their state's unique needs. ACL supports the State Councils on Developmental Disabilities as they decide what is best for their disabled constituents through a variety of initiatives, such as ones that seek to address financial literacy for people with disabilities.<sup>14</sup>
- ACL funds many additional initiatives that address barriers to employment for people with disabilities.
   For example, ACL's Inclusive Talent Pipeline for American Businesses creates the opportunity for businesses to "compete for cash prizes to help them expand their recruiting and retention programs to be inclusive of people with disabilities."<sup>15</sup>

In sum, no other federal agency can successfully do what ACL does. Breaking it up into parts will deteriorate ACL's offerings. Maintaining the existence of and funding for ACL is imperative to the wellbeing of people with disabilities and older adults.

## Personal Testimonies from People With Disabilities Who Succeeded Because of ACL

CPSD encourages the Committees' leadership and members to read through the personal success stories of disabled people who have benefited from ACL programs: <a href="https://acl.gov/programs/success-stories">https://acl.gov/programs/success-stories</a>

<sup>&</sup>lt;sup>10</sup> NDRN Member Agencies - Protection and Advocacy (P&A) Systems and Client Assistance Programs (CAP). (2025, February 27). National Disability Rights Network. <a href="https://www.ndrn.org/about/ndrn-member-agencies/">https://www.ndrn.org/about/ndrn-member-agencies/</a>

<sup>&</sup>lt;sup>11</sup> Administration for Community Living. (n.d.). *Protection & Advocacy Systems*. https://acl.gov/programs/pa-programs

<sup>&</sup>lt;sup>12</sup> Administration for Community Living. (n.d.). *Inclusive Transportation*. <a href="https://acl.gov/programs/transportation/transportation">https://acl.gov/programs/transportation/transportation</a>

<sup>&</sup>lt;sup>13</sup> Administration for Community Living. (n.d.). About the National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR). https://acl.gov/about-acl/about-national-institute-disability-independent-living-and-rehabilitation-research

<sup>&</sup>lt;sup>14</sup> Administration for Community Living. (n.d.). *State Councils on Developmental Disabilities*.

https://acl.gov/programs/aging-and-disability-networks/state-councils-developmental-disabilities

15 Administration for Community Living. (n.d.). ACL Awards Grand Prize in the "Inclusive Talent Pipeline for American Businesses" Challenge. https://acl.gov/programs/acl-seeks-business-partners-increase-hiring-workers-disabilities

The organization Youth Voice, Youth Choice—which is funded, in part, through ACL—published personal testimonies of people with disabilities who benefit from the practice of supported decision making, which is something ACL champions: <a href="https://youth-voice.org/stories-of-supported-decision-making/">https://youth-voice.org/stories-of-supported-decision-making/</a>

### Conclusion

The programs overseen by the Administration for Community Living are congressionally mandated, both in existence and in funding.<sup>16</sup> ACL is vital for the efficiency of federal interagency coordination of in-home service provision for disabled and older adults. Transferring ACL's program into different agencies, freezing its programmatic grants, and implementing RIFs will worsen services. These losses will damage national workforce readiness and participation, as well as the health of people with disabilities. The costly consequences of ACL's dismantling will be transferred to and paid for by states.

CPSD urges the Senate Committees on Finance and HELP to preserve the cohesion of and adequate funding for ACL, including its programs, services, and staff.

Should you have questions, or if you would like to set up a meeting with CPSD, please contact the co-chairs: Nina Stoller, Policy Coordinator at the Autistic Self-Advocacy Network (ASAN) at <a href="mailto:nstoller@autisticadvocacy.org">nstoller@autisticadvocacy.org</a> and Stephanie Flynt McEben, Public Policy Analyst at the National Disability Rights Network (NDRN) at <a href="mailto:Stephanie.McEben@ndrn.org">Stephanie.McEben@ndrn.org</a>.

### Sincerely,

The Collaboration to Promote Self-Determination (CPSD)

Applied Self-Direction

Association of People Supporting Employment First (APSE)

The Association of Programs for Rural Independent Living (APRIL)

Association of University Centers on Disabilities (AUCD)

Autism Society of America

Autistic Self Advocacy Network (ASAN)

Center for Public Representation

Microsoft

National Alliance for Direct Support Professionals, Inc. (NADSP)

National Disability Institute (NDI)

National Disability Rights Network (NDRN)

National Down Syndrome Congress (NDSC)

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<sup>&</sup>lt;sup>16</sup> The Administration for Community Living. (n.d.). History. https://acl.gov/about-acl/history