



State Council on Developmental Disabilities

• website • www.scdd.ca.gov • email • council@scdd.ca.gov

1507 21st Street, Suite 210
Sacramento, CA 95811



STATE OF CALIFORNIA
Edmund G. Brown Jr.
Governor

(916) 322-8481
(916) 443-4957 fax
(916) 324-8420 TTY

March 21, 2016

Andrew Morris
Office of the Commissioner
Administration on Disabilities
U.S. Department of Health and Human Services
330 C Street S.W.
Washington, D.C. 20201

Sent via email to AIDDformula@acl.hhs.gov

Dear Mr. Morris:

The California State Council on Developmental Disabilities (SCDD) respectfully submits the following comments regarding the Notice of Guidance with respect to the New Funding Formula for State Councils on Developmental Disabilities and Protection and Advocacy Systems. As you are aware, SCDD is the council established in California under the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (DD Act) Section 125. SCDD undertakes advocacy, capacity, building, and system change activities in a multi-layered complex delivery system serving approximately 39 million Californians and 618,000 people with an intellectual and/or developmental disability.

SCDD applauds the Administration on Disabilities (AOD) efforts to clarify the funding formula. The current formula was last adjusted decades ago, uses unreliable data, and is so complicated that it largely cannot be validated. SCDD appreciates AOD's efforts to update and simplify the formula while creating transparency.

SCDD supports the formula as drafted for the following reasons.

The draft formula follows the DD Act intentions

The formula is concise, transparent, and consistent with Congressional intent to provide funds based on greatest need. The draft formula follows Congressional intent for population, need for services, and financial need.

"The Council advocates, promotes & implements policies and practices that achieve self-determination, independence, productivity & inclusion in all aspects of community life for Californians with developmental disabilities and their families."

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The draft allocation selects the appropriate amount for the minimum allocation for states and territories

It is important that small states and territories have a minimum allocation to execute the DD Act's mission throughout the country. The draft allocation strikes the right balance. California has 12.2% of the population and need, is a high poverty state, yet would likely receive 9.49% of the funding under the formula. An additional allocation to minimum needs states would dilute the DD Act priorities of population, needs for services, and financial need.

The draft formula uses the correct data sources

July census estimates, the National Health Interview Survey on Disability prevalence rate of 1.58% and poverty and unemployment counts are reliable and verifiable. These sound data sources increase the validity of the formula.

SCDD appreciates the work of the formula workgroup for creating a sound draft formula. 63% of states and territories are largely unaffected by this formula, showing the draft strikes the right balance of correcting inequities without over adjusting more than what needs to be addressed.

Thank you for the opportunity to provide comment on this proposed funding formula. SCDD urges you to support the formula as drafted.

Sincerely,



Dr. April Lopez
Chairperson