The DC Developmental Disabilities Council (DDC) is pleased to submit these comments to the Office of Disability Rights (ODR) and partner agencies on DC’s Olmstead Community Integration Plan. The DDC’s role is to strengthen the voice of people with developmental disabilities and their families in support of greater independence, inclusion, empowerment, and the pursuit of life as they choose. Through advocacy and education, we create change that eliminates discrimination and removes barriers to full inclusion in DC.

Overall, we commend the efforts of ODR and its partner agencies in planning together to ensure that DC residents can live their lives to the fullest in the community, and not in institutions. Because the DDC staff sit within ODR, the DDC Council’s Designated State Agency, we have seen firsthand the expanded and ongoing collaboration with DC government entities that play a role in community integration. Additionally, we are encouraged by the enthusiasm of those who worked on the plan to find solutions and try to respond to the concerns of the community.

We believe that a viable Olmstead Plan should establish a vision for community living in DC and identify measurable goals for government agencies to achieve in service of that vision. There are some areas of the Olmstead Plan, as currently written, that we think fall short in this regard. We would like to see a more comprehensive analysis of where the District currently stands in terms of providing services in the most integrated setting possible. The plan lists many services and programs that may be available to District residents, but it does not meaningfully analyze the efficacy of those services and programs. It also does not discuss institutional environments such as jails, juvenile detention centers, segregated day programs, or DC-funded residential placements outside of the District. Including these elements would better establish a baseline from which to measure progress.

Relatedly, we believe the plan as written lacks clarity on how the District will measure progress. It is not clear what the overall vision and commitment to community integration is, and there is a lack of measurable goals associated with many of the metrics listed. Meaningful goals with associated metrics will help to clearly show improvement or decline and thus highlight areas that need more attention. Further, meaningful goals should identify if and where additional funding is necessary, and if so, how the District is investing in those goals so they can be fully achieved.
The inter-agency process put in place to arrive at the current plan will, we hope, serve as the basis for continued efforts by the administration to work toward more meaningful and widespread community integration. Even though the current plan leaves a good number of questions unanswered, working together, the team that has been formed can continue to make headway between now and 2024, and the DDC and its partners look forward to assisting the administration in those efforts.

We thank you for your consideration of these comments. If you have any questions, please contact the DDC Executive Director, Alison Whyte, at alison.whyte@dc.gov or 202-340-8563.