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April 10, 2025

Amy Whiting, Staff Counsel

California Department of Developmental Services

1215 O Street

Sacramento, CA 95814

**RE: Modified Text -Special Incident Reporting Requirements - Proposed Regulations (17 CCR sections 54327, 54327.1, 56002, 56026, 56038, 56059, and 56093)**

Dear Ms. Whiting:

California’s regional centers are a network of 21 community-based non-profits, represented by the Association of Regional Center Agencies (ARCA). The regional centers coordinate services for, and advocate on behalf of approximately 450,000 Californians with developmental disabilities.

ARCA welcomes the opportunity to comment on the modified text proposed by the Department of Developmental Services (DDS) related to Special Incident Reporting (SIR) Requirements.

ARCA acknowledges and supports the work of DDS in amending sections 54327, 54327.1, 56002, 56026, 56038, 56059, and 56093 of Title 17, California Code of Regulations (CCR). These amendments are crucial for enhancing transparency, accountability, and, most importantly, ensuring the protection, health, safety, and welfare of individuals served.

ARCA appreciates the shift towards "people-first" language, notably replacing the term "consumers" with "individuals served" throughout the regulations. This change reflects a commitment to dignity and respect for those receiving services and aligns with best practices in disability advocacy. By using inclusive and person-centered language, DDS fosters a culture of respect and reinforces the importance of recognizing individuals for who they are, beyond the services they receive.

**Highlights of Key Provisions:**

**Section 54327(a)(14)** **Definition of Individual Served**: ARCA supports the redefinition of “consumer” to “individual served” as it mirrors the values of person-centered planning and promotes the Department's mission to cultivate a respectful and inclusive environment.

**Clarification in Incident Reporting:** ARCA believes that the updated definitions and reporting guidelines, including the more detailed descriptions of incidents such as emotional, financial, and physical abuse, as well as the inclusion of incidents like human trafficking, isolation, and verbal abuse, provide a clearer framework for consistent reporting across regional centers. This will enable better tracking of incidents and improve the overall quality of care.

ARCA appreciates the opportunity to provide comments to the Department of Developmental Services regarding the proposed amendments to Special Incident Reporting (SIR) Requirements. We commend DDS for its dedication to improving the regulations in ways that enhance the safety and well-being of individuals served by California's regional centers.

If you have any questions regarding our position or require further clarification, please do not hesitate to contact Darline Dupree in our office at [ddupree@arcanet.org](mailto:ddupree@arcanet.org) or (916) 877-8119. ARCA looks forward to ongoing collaboration with DDS to ensure that the proposed amendments are effectively implemented.

Sincerely,

/s/

Amy Westling

Executive Director