



STATE OF HAWAII
KA MOKU'ĀINA O HAWAII
STATE COUNCIL ON DEVELOPMENTAL DISABILITIES
'A'UNIKE MOKU'ĀPUNI NO KA NĀ KĀWAI KULA
PRINCESS VICTORIA KAMĀMALU BUILDING
1010 RICHARDS STREET, Room 122
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TELEPHONE: (808) 586-8100 FAX: (808) 586-7543

February 27, 2026

The Honorable Senator Karl Rhoads, Chair
Senate Committee on Judiciary
The Thirty-Third Legislature
State Capitol
State of Hawai'i
Honolulu, Hawai'i 96813

Dear Chair Rhoads and Committee Members:

SUBJECT SB2340, SD1 - Relating to Community Care Foster Family Homes

The Hawai'i State Council on Developmental Disabilities (SCDD) is in **STRONG SUPPORT** of **SB2340 SD1**.

This measure is important because it removes a systems barrier that currently forces some individuals with intellectual and developmental disabilities (I/DD) to make an unnecessary choice between where they live and which Medicaid waiver funds their services. SB 2340, SD1 clarifies a simple principle: a person who meets an intermediate care facility (ICF) or nursing facility level of care should not be denied residency in a licensed Community Care Foster Family Home (CCFFH) solely because of disability status or waiver enrollment.

Why this bill is a practical, person-centered clarification

This measure does not require that everyone in the 1915(c) waiver move into CCFFHs. It simply opens an option for people and families who are seeking a small, home-like setting, especially on the Neighbor Islands, where choices are limited and "one-size-fits-all" residential models are not realistic. The underlying issue is not whether CCFFHs can be safe for people with I/DD, Hawai'i already operates diagnosis-neutral residential models that safely serve mixed populations. For example, Adult Residential Care Homes (ARCH) routinely serves residents with a range of disabilities and age-related conditions. The concept of mixed populations is not new in Hawai'i; what is new is being explicit that waiver enrollment cannot be used as a categorical exclusion.

What is missing from the discussion: capacity growth can be unlocked

A key benefit of SB2340, SD1 is its potential to increase capacity without building a new system.

- Existing Adult Foster Homes (AFHs) and similar providers may choose to transition to a CCFFH model when appropriate, which can allow a home to lawfully serve up to three residents under CCFFH standards.
- That practical pathway creates the possibility of adding meaningful capacity statewide, potentially hundreds of additional beds over time, by enabling willing providers to operate under the licensing structure that matches the level-of-care needs of their residents.

In other words, this measure is not just about “moving people between waivers.” It is also about unlocking provider flexibility so Hawai’i can grow community-based options, particularly in rural areas.

Populations are more similar than the current silos suggest

In real-world settings, the support needs of individuals in AFHs and CCFFHs can overlap significantly. Many adults with I/DD in community settings:

- take multiple medications,
- need assistance with activities of daily living,
- and may require intermittent nursing tasks (such as medication administration support and health monitoring).

This bill supports the reality that individuals with I/DD are living longer and often experience age-related health changes. People should be able to age in place rather than being forced into disruptive transitions simply because their health needs evolve or because the funding stream is treated as a gatekeeper to housing.

Choice includes how services are used, not only where someone lives

SB 2340, SD1 also supports another practical reality: not every person uses Medicaid-funded services in the same way. Some individuals may live in a licensed home setting supported primarily by their own income (for example, SSI and the State Supplementary Payment) and still rely on the 1915(c) waiver for day services, community participation, employment supports, or other out-of-home services. This bill helps preserve continuity and allows services to be tailored to the person, rather than forcing an “all-or-nothing” waiver shift tied to the address where they live.

This is not “for everyone”, and that is exactly the point

The Council agrees this option will not be appropriate for every individual. That is not a flaw; it is the purpose of person-centered policy. Hawai’i needs a menu of community options so individuals and families can choose what fits, particularly when the alternative can be institutional placement, unnecessary transitions, or avoidable crises.

Addressing concerns about system capacity

Concerns have been raised about the limited number of CCFFHs and the potential for increased demand. It is our understanding that there are over twenty-five vacant slots in Adult Foster Home (AFH) on O’ahu and a waitlist of more than two hundred individuals seeking to open AFHs. This demonstrates that the constraint is not solely the number of homes, but the regulatory silos between residential models. SB 2340, SD1, does not simply shift individuals into CCFFHs; it creates flexibility that may allow appropriate AFH providers to transition to the CCFFH model and open an additional bed where appropriate. Rather than overloading CCFFHs, this measure can expand total community capacity by better aligning level of care, and person-centered placement.

Request

For these reasons, the Hawai’i State Council on Developmental Disabilities respectfully urges the Committee to pass SB 2340, SD1. This measure advances equity, continuity of care, and community integration by ensuring waiver enrollment is not misused as a barrier to housing choice.

Thank you for the opportunity to submit testimony in **support of SB2340 SD1**.

Sincerely,



Daintry Bartoldus
Executive Administrator



DISABILITY AND COMMUNICATION ACCESS BOARD

Ka 'Oihana Ho'oka'a'ike no ka Po'e Kīnānā

1010 Richards Street, Rm. 118 • Honolulu, Hawai'i 96813
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February 27, 2026

TESTIMONY TO THE SENATE COMMITTEE ON JUDICIARY

Senate Bill 2340 Senate Draft 1 – Relating to Community Care Foster Family Homes

The Disability and Communication Access Board (DCAB) supports Senate Bill 2340 Senate Draft 1 – Relating to Community Care Foster Family Homes. This bill clarifies that individuals with intellectual and developmental disabilities who meet an intermediate care facility or nursing facility level of care shall not be denied residency in a licensed community care foster family home solely because of their disability or enrollment in a specific medicaid waiver program.

Community care foster family homes provide an important service for individuals who need twenty-hour support. Currently, individuals with intellectual and developmental disabilities who are enrolled in a HCBS I/DD waiver program who wish to reside in a community care foster family home must disenroll from and transition into the Medicaid Section 1115 Waiver Program. This requirement disrupts continuity of care and may result in the loss of essential, individualized services.

Senate Bill 2340 Senate Draft 1 will eliminate this requirement and allow them to remain in the HCBS I/DD waiver program.

Thank you for the opportunity to testify.

Respectfully submitted,

KRISTINE PAGANO
Acting Executive Director

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



RYAN I. YAMANE
DIRECTOR
KA LUNA HO'OKELE

JOSEPH CAMPOS II
DEPUTY DIRECTOR
KA HOPE LUNA HO'OKELE

STATE OF HAWAII
KA MOKU'ĀINA O HAWAI'I
DEPARTMENT OF HUMAN SERVICES
KA 'OIHANA MĀLAMA LAWELAWE KANAKA
Office of the Director
P. O. Box 339
Honolulu, Hawaii 96809-0339

TRISTA SPEER
DEPUTY DIRECTOR
KA HOPE LUNA HO'OKELE

February 25, 2026

TO: The Honorable Senator Karl Rhoads, Chair
Senate Committee on Judiciary

FROM: Ryan I. Yamane, Director

SUBJECT: **SB 2340 SD1 – RELATING TO COMMUNITY CARE FOSTER FAMILY HOMES.**

Hearing: February 27, 2026, 10:30 a.m.
Conference Room 016 & via Videoconference, State Capitol

DEPARTMENT'S POSITION: The Department of Human Services (DHS) appreciates the intent of the bill to allow individuals with Intellectual and Developmental Disabilities (I/DD) enrolled in the 1915(c) waiver to reside in Community Care Foster Family Homes (CCFFH) without losing access to other 1915(c) services and offers comments. DHS respectfully requests any appropriation not reduce or replace priorities identified in the executive budget.

DHS appreciates the SD1 amendments.

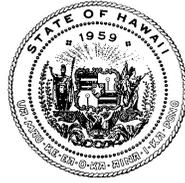
DHS agrees that there is a great need to increase community capacity and skill of care home providers to meet the needs of Hawaii's residents who require residential care and delay the use of more costly institutional care. DHS is actively working to expand access to Adult Foster Homes (AFH), which offer community placement options for individuals with developmental or intellectual disabilities, and notes that it has already requested Centers for Medicare and Medicaid Services (CMS) approval to increase AFH compensation on the Neighbor Islands to support the retention of existing providers and expand capacity.

The bill would require updating CCFFH licensure standards to accommodate individuals at the ICF/ID level of care, and the 1915(c) waiver would need to be amended to include CCFFH services. DHS defers to the Department of Health (DOH) on CCFFH licensure standards and is willing to seek approval from CMS to add CCFFH services to the 1915(c) waiver.

Also, funding is likely needed to train CCFFH operators and their staff to support the placement of individuals with I/DD and DHS defers to DOH regarding their resource needs.

Thank you for the opportunity to provide comments on this measure.

JOSH GREEN, M.D.
GOVERNOR OF HAWAII
KE KIA'AINA O KA MOKU'AINA 'O HAWAII



KENNETH S. FINK, M.D., M.G.A., M.P.H.
DIRECTOR OF HEALTH
KA LUNA HO'OKELE

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. Box 3378
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**WRITTEN
TESTIMONY ONLY**

**Testimony COMMENTING on SB2340 SD1
RELATING TO COMMUNITY CARE FOSTER FAMILY HOMES**

SENATOR KARL RHOADS, CHAIR
SENATOR MIKE GABBARD, VICE CHAIR
COMMITTEE ON JUDICIARY

Hearing Date and Time: February 27, 2026, 10:30 a.m. Location: Room 016 & Video

1 The Department of Health, Developmental Disabilities Division (DOH-DDD) appreciates
2 the intent of this bill and offers comments. The DOH-DDD agrees that there is a need for
3 increased residential options for individuals with intellectual and developmental disabilities
4 (IDD), especially in rural areas of the State. DOH-DDD is collaborating with the Department of
5 Human Services (DHS) to improve access to residential settings for individuals with IDD. DOH-
6 DDD appreciates the amendments made by the Committee on Health and Human
7 Services. However, DOH-DDD still believes the approach in this bill raises some concerns, but
8 prefers SB2340 SD1 to its companion, HB1731 HD1.

9 SB2340 SD1 intends to allow individuals with IDD participating in the Medicaid 1915(c)
10 HCBS waiver to reside in CCFFHs, which are currently available to individuals enrolled in the
11 Medicaid 1115 HCBS waiver. The DOH-DDD appreciates the intent to expand residential options
12 for individuals with IDD and reduce transitions out of the 1915(c) waiver. The DOH-DDD is
13 already actively working to explore and implement other pathways to increase residential
14 capacity for individuals with IDD through a current waiver renewal and is committed to ongoing
15 collaboration with DHS and other stakeholders to discuss the requirements and implications of
16 allowing 1915(c) participants to reside in CCFFHs.

1 The Medicaid 1915(c) HCBS waiver for individuals with IDD is authorized under Section
2 1915(c) of the Social Security Act. The DOH-DDD and the DHS Med-QUEST division (MQD) work
3 in partnership to design and implement the 1915(c) waiver in compliance with requirements,
4 laws, and waiver standards. Individuals in the 1915(c) waiver needing residential habilitation
5 services may receive them in various licensed or certified settings, such as Adult Foster Homes
6 (AFHs) for individuals with IDD, DD Domiciliary Homes, and Adult Residential Care Homes. To
7 increase options for individuals with IDD, DOH-DDD has partnered with MQD to propose
8 additional services through a 1915(c) waiver renewal. The waiver renewal proposal includes
9 supplemental payments for agencies to establish new adult foster homes for individuals with
10 IDD. These efforts promise to increase housing capacity for individuals with IDD without
11 competing for limited resources intended for the current CCFFH beneficiaries. Furthermore,
12 these new services and incentives allow individuals with IDD to continue receiving services from
13 caregivers trained in supporting the needs of individuals with IDD through a wide array of
14 1915(c) waiver services.

15 The DOH-DDD recognizes the importance of ensuring continuity of care for 1915(c)
16 participants. Although the total number of individuals transitioned to the 1115 waiver remains
17 very low, the DOH-DDD is working in partnership with MQD to reduce this number further. The
18 renewal adds waiver services such as personal care assistance and residential care supports to
19 promote participants with IDD to age-in-place while continuing to receive 1915(c) services and
20 avoid transfer to the 1115 waiver.

21 As many of these efforts are contingent on waiver approval, DOH-DDD appreciates the
22 statutory changes in this bill taking effect upon approval of the waiver. This allows for public
23 comment and stakeholder engagement and acceptance in which issues can be vetted and
24 addressed.

25 Similarly, making the statutory changes effective upon revision of CCFFH standards by
26 the Office of Health Care Assurance (OHCA) who has regulatory authority over CCFFHs is

1 extremely beneficial. Placement in a CCFFH must comply with OHCA's regulations, which
2 include, among other requirements, case management oversight which is different than the
3 case management currently provided by DOH-DDD. In addition, if a participant in the 1915(c)
4 waiver were residing in a CCFFH concurrently with an individual(s) in the 1115 waiver,
5 coordination would be required between the DOH-DDD administering the 1915(c) waiver and
6 health plans administering the 1115 waiver to avoid duplication of services and ensure
7 appropriate services are delivered. Allowing any regulatory changes to occur prior to these
8 statute changes ensures proper public input and that standards are in place.

9 DOH-DDD notes that challenges regarding training, contracting, and implementation
10 remain. Training CCFFH caregivers, contracting with CCFFH agencies, and implementing service
11 requirements also present challenges. Caregivers in CCFFHs are certified nursing assistants or
12 registered nurses trained to support individuals with Nursing Facility level of care (LOC) needs.
13 The CCFFH caregivers and agencies that support them are not contracted as providers for
14 1915(c) services and are not trained to support individuals with Intermediate Care Facility for
15 Individuals with Intellectual Disability level of care needs. CCFFH caregivers would be required
16 to receive additional training to support individuals with IDD and the agencies they serve would
17 be required to contract as 1915(c) waiver service providers.

18 The LOC determinations were created to ensure individuals in specific populations
19 received targeted services. For example, many people with IDD do not have skilled nursing or
20 complex medical needs and instead require habilitative supports to meet their life goals in
21 home and community settings. In contrast, elderly people with advancing medical needs
22 require skilled nursing support, not habilitative support, and may be better served in a setting
23 that provides skilled nursing to address those needs. Allowing individuals in the 1915(c) waiver
24 to access the limited number of CCFFHs will reduce CCFFH access for populations such as the
25 elderly and those with nursing home level of care in the 1115 waiver. The impact and cost of
26 this is unknown.

1 The DOH-DDD will continue to work closely with DHS, OHCA, and stakeholders to
2 consider the implementation of the outlined regulatory and administrative pathways to allow
3 individuals with IDD to reside in CCFFHs to ensure the timeline and scale is feasible, data driven,
4 collaborative, and does not compromise access and quality of services for vulnerable
5 populations.

6 Thank you for the opportunity to provide comments.



The Honorable Karl Rhoads, Chair
Senate Committee on Judiciary
The Thirty-Third Legislature
State Capitol
State of Hawai'i
Honolulu, Hawai'i 96813

Dear Chair Rhoads and Committee Members:

The Hawai'i Self-Advocacy Advisory Council(SAAC) strongly supports SB2340 SD1. The bill makes sure that people with intellectual and developmental disabilities cannot be denied a place in a Community Care Foster Family Home just because of their disability or because they use a specific Medicaid waiver.

Right now, some people with I/DD are kept out of these homes for administrative reasons—not because of safety or care needs. SB2340 SD1 fixes this by clarifying that waiver enrollment cannot be used as a reason to exclude someone. This allows people to keep their services, stay in appropriate licensed homes, and avoid unnecessary moves.

For these reasons, the Hawaii Self-Advocacy Advisory Council strongly supports SB2340 SD1.

Timothy Renken,

A handwritten signature in black ink, appearing to read 'Timothy Renken', written in a cursive style.

President, Hawaii Self-Advocacy Advisory Council



www.AlohaILHawaii.org

Feb 24, 2026

MISSION

Aloha Independent Living Hawaii (AILH) dedicated to providing independent living programs and services for persons with disabilities in Hawaii.

We work together with the community and consumers to improve the quality of life through individual choices and access to services.

EXECUTIVE DIRECTOR

Roxanne U. Bolden

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The Honorable Senator Karl Rhoads, Chair
Senate Committee on Judiciary
The Thirty-Third Legislature
State Capitol
State of Hawaii
Honolulu, Hawaii 96813

SUBJECT: SB 2340 SD1, Relating to Community Care Foster Family Homes

Chair and Members of the Committee:

Aloha Independent Living Hawaii (AILH) respectfully submits testimony in **support of SB2340 SC1 with recommendations.**

SB2340 SD1 clarifies that individuals who meet an intermediate care facility or nursing facility level of care and are eligible for services under either the 1915(c) Medicaid waiver or the Medicaid section 1115 demonstration waiver shall not be denied residency in a certified community care foster home solely based on disability status of waiver enrollment. This clarification removes a statutory ambiguity that has functioned as a barrier to housing choice and continuity of services.

Under the current framework, individuals with intellectual and developmental disabilities (I/DD) who wish to reside in a community care foster family home have been required to disenroll from the HCBS I/DD waiver and transition to the 1115 waiver. This requirement disrupts continuity of care and may result in the loss of individualized supports. Housing eligibility should not be conditioned on relinquishing legally authorized waiver services.

From a civil rights perspective, SB2340 SD1 reinforces the principle that individuals with disabilities have the right to live in the least restrictive setting appropriate to their needs. When waiver enrollment becomes a disqualifying factor for residency in a licensed community-based home, it creates a structural inequity between similarly situated individuals. Clarifying that waiver status shall not be used to deny residency advances fairness, equal access, and statutory consistency.



www.AlohaILHawaii.org

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We work together with the community and consumers to improve the quality of life through individual choices and access to services.

EXECUTIVE DIRECTOR

Roxanne U. Bolden

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AILH respectfully offers the following recommendations:

First, implementation must preserve person-centered planning and informed choice. Individuals must retain meaningful autonomy in deciding where and with whom they live, consistent with the broader principles of community integration.

Second, oversight and quality assurance safeguards should remain robust to ensure that community care foster family homes maintain home-like, non-institutional characteristics and uphold residents' rights.

Third, AILH encourages the Legislature to examine whether this clarification can be extended beyond individuals served exclusively under the I/DD waiver. Individuals with other disabilities who meet intermediate care facility or nursing facility level of care and receive services under alternative Medicaid pathways may face similar structural barriers. Housing access and continuity of care should not depend on disability category or waiver enrollment.

Finally, alignment between the Department of Health and the Med-QUEST Division to harmonize waiver language and provider qualifications will be essential to ensure consistent application and prevent administrative inconsistencies that could undermine legislative intent.

SB2340 SD 1 strengthens statutory clarity, protects housing access, and promotes equitable treatment under Medicaid waiver programs. AILH respectfully urges the Committee to advance this measure with consideration of the above recommendations.

Thank you for the opportunity to testify.

Aloha,

Roxanne Bolden
Executive Director

SB-2340-SD-1

Submitted on: 2/23/2026 6:52:30 PM

Testimony for JDC on 2/27/2026 10:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Louis Erteschik	Testifying for Hawaii Disability Rights Center	Support	Written Testimony Only

Comments:

We support this Bill. It will expand housing and community integration opportunities for individuals in the ID or DD population. Our understanding is that this is a particular problem on the neighbor islands, where homes that are specially designed for individuals with developmental disabilities are in short supply . Yet there are Community Care Foster Homes that could admit these individuals but for the current maze of regulations that govern different types of care homes. We have seen cases where individuals were forced to relocate to Oahu when they could have remained in their community had they been allowed to be placed in a Community Care Foster Home. The result is they are uprooted from their community and placed further away from their family. The hope is that this measure will provide some flexibility so as to minimize those occurrences. Ultimately, the goal is to increase the capacity, especially on the neighbor islands, to care for this population.

The Honorable Senator Karl Rhoads, Chair
Senate Committee on Judiciary
The Thirty-Third Legislature
State Capitol
State of Hawai'i
Honolulu, Hawai'i 96813

Dear Chair Rhoads and Committee Members:

SUBJECT SB2340, SD1 - Relating to Community Care Foster Family Homes

I am in support of SB 2340, SD1. My name is Deziree Tacub, I am a self-advocate from Kauai.

In the future I might need to live in a community care foster home. To live in one, I would lose my 1915c Waiver services. That would leave me without a direct support professional. I want to be able to live in my community and get the services I need to be independent.

This bill would allow me to have my services and still live in my community.

Thank you for allowing me to speak in support of SB2340, SD1.

SB-2340-SD-1

Submitted on: 2/24/2026 2:46:39 PM

Testimony for JDC on 2/27/2026 10:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Sue Berk	Individual	Support	Written Testimony Only

Comments:

I am the mother of an adult with developmental disabilities. Residential options are limited generally and I am concerned about the right residential placement for my son when I can longer care for him.

In a system and a state where residential options are limited for persons with disabilities this bill will help remove administrative barriers and preserve continuity of care in certain situations.

And If this bill has the potential to increase capacity let's get it done.

I support SB 2340.

Thank You for your consideration.

Sue Berk

SB-2340-SD-1

Submitted on: 2/24/2026 2:45:39 PM

Testimony for JDC on 2/27/2026 10:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Iris Xiao	Individual	Support	Written Testimony Only

Comments:

Aloha Chair Karl Rhoads, Vice Chair Mike Gabbard, and Committee Members.

My name is Iris Xiao.

Thank you for this opportunity to provide testimony in **strong support of SB2340 SD1**.

I am from Honolulu, and I am self-advocate with autism, and I love to learn but sometimes it can be difficult for me.

SB2340 SD1 is important because I think it is important for people with intellectual and developmental disabilities (IDD) to have a choice in where they live. Living in the community is important for people with IDD for being independent, understanding new things, having self-determination, and being your own person, all while still having support. Living in the community is important so that you can be in charge of your own life and be an active member of the community.

One day I would like to live with my boyfriend and maybe get married, and it is uncomfortable to do that when you live at home. By living in the community instead of living at home, this will help us be more independent with our lives together.

I strongly support SB2340 SD1.

Thank you for the opportunity to provide testimony,

Iris Xiao.

SB-2340-SD-1

Submitted on: 2/24/2026 9:36:10 PM

Testimony for JDC on 2/27/2026 10:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Johnnie-Mae L. Perry	Individual	Support	Written Testimony Only

Comments:

I, Johnnie-Mae L. Perry, STRONGLY SUPPORT

2340 SB RELATING TO COMMUNITY CARE FOSTER FAMILY HOMES

To: Senator Karl Rhoads, Chair
Senator Mike Gabbard, Vice Chair
Committee on Judiciary

From: Veronica Moore, Individual Citizen

Date: February 26, 2026

RE: Senate Bill 2340 SD1
Measure Title: RELATING TO COMMUNITY CARE FOSTER FAMILY HOMES.
Report Title: Community Care Foster Family Homes; Individuals with Intellectual
and Developmental Disabilities; Medicaid; Housing Access

To All Concerned,

My name is Veronica Moore and I support Senate Bill 2340 SD1. Thank you for your consideration.

Sincerely,

Veronica M. Moore

SB-2340-SD-1

Submitted on: 2/26/2026 9:55:41 AM

Testimony for JDC on 2/27/2026 10:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Jackie Keefe	Individual	Support	Written Testimony Only

Comments:

Aloha Chair Rhoads, Vice Chair Gabbard, and Members of the Committee,

My name is Jackie Keefe, and I am **in strong support of SB2340 SD1**, which clarifies that individuals with intellectual and developmental disabilities who meet an intermediate care facility or nursing facility level of care cannot be denied residency in a licensed Community Care Foster Family Home (CCFFH) solely because of their disability or Medicaid waiver enrollment.

This measure removes an administrative barrier that forces individuals to choose between stable housing and the services that support their health and safety and is an important step towards equity for our disability community.

Mahalo for the opportunity to testify.

Jackie Keefe, Lahaina