

June 17, 2026

**Statement of the Rehabilitation and Community Providers Association (RCPA)  
in Support of the  
HHS Section 504 Regulations**

TO: **Bazelon Center for Mental Health Law**  
**Advocacy Litigation Dept**  
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The Rehabilitation and Community Providers Association (RCPA) respectfully submits this statement in support of the U.S. Department of Health and Human Services' 2024 regulations implementing Section 504 of the Rehabilitation Act and urges the Court to uphold the rule.

RCPA represents more than 400 health and human service provider organizations that collectively serve over 2.5 million Pennsylvanians annually through programs operated under every major Pennsylvania Department of Human Services program office, including the Office of Long-Term Living, Office of Developmental Programs, Office of Mental Health and Substance Abuse Services, and Office of Children, Youth and Families. Our members support older adults, individuals with intellectual and developmental disabilities, people with physical disabilities, individuals with behavioral health and substance use disorders, children with complex needs, and countless family caregivers throughout the Commonwealth.

At its core, this case is about whether individuals with disabilities will continue to have a clear and enforceable pathway to live, work, learn, and participate in their communities rather than being unnecessarily isolated or segregated from community life. The HHS Section 504 regulations help preserve that pathway.

For millions of Americans, community integration is not an abstract legal concept. It means the ability to live near family, attend school, maintain employment, participate in faith communities, build friendships, and make everyday decisions about how and where to live. It means that an older adult can remain in their home with support rather than entering an institution. It means that a person with a disability can work, volunteer, socialize, and participate in civic life alongside neighbors and peers. It means that families can remain together and that individuals can exercise the same choices and freedoms that others take for granted.

These principles are grounded in Section 504 of the Rehabilitation Act, 29 U.S.C. § 794, and reinforced by the Supreme Court's decision in *Olmstead v. L.C.*, 527 U.S. 581 (1999), which recognized that the unnecessary segregation of individuals with disabilities constitutes discrimination. The HHS regulations build upon these longstanding principles by clarifying the obligations of entities receiving federal financial assistance and reaffirming the nation's commitment to serving individuals in the most integrated setting appropriate to their needs.

Pennsylvania's experience demonstrates the value of this framework. Over the past several decades, the Commonwealth has expanded home and community-based services, behavioral health supports, employment programs, residential alternatives, and long-term services that enable individuals to remain active participants in community life. As a result, thousands of Pennsylvanians who might once have had limited options beyond

institutional settings now live in their own homes, work in their communities, attend local schools, and participate in community life with appropriate supports.

The individuals served by RCPA members have built their lives around these opportunities. Families have made long-term plans based on the availability of community-based services. Individuals have established jobs, housing arrangements, relationships, and support networks that depend on continued access to integrated services. The stability and clarity provided by the Section 504 regulations help protect those opportunities and reinforce the expectation that disability should never be a basis for unnecessary exclusion from community life.

Weakening or invalidating these regulations would create uncertainty regarding the protections that individuals with disabilities and older adults have relied upon for decades. While states and providers would continue their commitment to community-based care, the erosion of the federal framework supporting integration risks slowing progress toward greater inclusion and weakening protections against unnecessary segregation. Providers or government agencies would not feel the greatest impact—it would be felt by the individuals and families whose independence, opportunities, and quality of life depend upon access to community-based supports.

The Court's decision will affect far more than regulatory language. It will help determine whether the nation's disability rights laws continue to provide a strong and reliable foundation for inclusion, opportunity, and equal participation in community life. For the millions of individuals who depend upon these protections, community integration is not merely a policy objective; it is a pathway to dignity, independence, and full citizenship.

For these reasons, RCPA respectfully urges the Court to uphold the 2024 HHS Section 504 regulations and preserve the longstanding federal commitment to equal access, non-discrimination, and community integration for individuals with disabilities and older adults.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Richard S. Edley', is positioned above the typed name.

Richard S. Edley, PhD  
President and CEO