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New Hampshire Developmental Services Quality Council
Systems Review Committee
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Public Comment

**New Hampshire Developmental Services Abuse and Neglect Systems Review
Committee**

Dear Committee:

I submit this public comment as a private citizen and former CEO of a New Hampshire Area Agency, not as a representative of Lakes Region Community Services or any current employer. The perspectives shared here are my own and are informed by nearly two decades working inside New Hampshire's developmental services system.

Like many who spent their careers in this work, I was not surprised by the recent reporting that prompted this Systems Review. Disturbed, yes. Heartbroken, absolutely. But surprised, no. What we are witnessing today, horrific cases, preventable suffering, and loss of life, did not emerge from a single failure or a handful of bad actors. These outcomes are the predictable result of decades of under-resourcing, misplaced priorities, bureaucratic expansion, and political avoidance. The cost of that neglect has been borne by the most vulnerable citizens of New Hampshire.

A Workforce and System Stretched Beyond Its Limits

For years, leaders across the system sounded alarms. They understood the gravity of the risks. What they lacked were the resources, and increasingly, the authority, to address them.

The direct support workforce has been running on fumes for a long time. Many of the most experienced and dedicated staff are themselves aging, burned out, and exhausted, yet they stay because they know there is no one behind them. When wages sit at the bottom of the labor market and unemployment remains low, agencies are forced to fill shifts with applicants who are often not adequately prepared. This reality is not safe, not sustainable, and not fair, to staff or to the people they support.



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Layered on top of this workforce crisis has been a steady expansion of administrative burden under the banner of rooting out “fraud, waste, and abuse.” These efforts did not meaningfully improve quality. Instead, they diverted time and energy away from people and into paperwork, audits, and compliance activities that too often lacked a direct connection to safety outcomes.

When a system becomes this large and this complex, the people it exists to serve are the first to get lost.

Sentinel Events Without System Learning

During my 18.5 years at an Area Agency, I filed numerous sentinel events involving serious incidents affecting the health, safety, and well-being of individuals served. Yet only once, more than a decade ago, was I contacted by the State of New Hampshire to participate in a Sentinel Event Review Board to discuss those events, identify trends, or consider changes to practice or policy to prevent recurrence.

That absence of structured feedback, trend analysis, and system-level learning was not isolated to a single administration or moment in time. Sentinel events too often became paperwork requirements rather than critical opportunities for prevention, improvement, and accountability. Responsibility was diffuse, and meaningful system learning was rare.

Complaint Investigations: Authority Eroded Over Time, Safety Delayed

My frustration deepened as responsibility for complaint investigations was gradually removed from Area Agencies. This did not happen all at once, but over time, through a series of policy and structural changes that steadily narrowed local authority and shifted investigative control away from agencies closest to the individuals and providers involved.

Prior to these changes, Area Agencies deliberately erred on the side of caution. When concerns about abuse, neglect, or serious harm arose, agencies acted immediately to mitigate risk while investigations proceeded. That proximity mattered. Agencies knew the individuals, the providers, the staff, and the context, and they had both responsibility and authority to intervene.

As investigative authority was centralized, that ability diminished. For over a decade investigations were handled at the state level, and by the post-2023 environment, Area Agencies no longer had contractual oversight of vendor agencies, nor the authority to act



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decisively while investigations unfolded. What replaced local action is a drawn-out investigative process that is often neither timely nor rigorous.

It is important to acknowledge that some of the horrific tragedies reported publicly occurred during earlier phases of this transition, when some level of Area Agency oversight still existed. That fact does not negate the concerns raised here. Rather, it underscores them. Oversight weakened gradually, not abruptly, and safety eroded along with it. Each step away from local authority lengthened response timelines, blurred accountability, and increased risk.

Investigations themselves frequently lacked basic standards of quality. Reports contained factual inaccuracies, incorrect names, dates, or locations, and conclusions based more on opinion than evidence. Most troubling of all, these investigations rarely resulted in clear, actionable outcomes that agencies could implement to reduce risk and prevent recurrence.

This shift did not increase safety. It delayed it.

A Broader Structural Failure

None of this exists in isolation. New Hampshire's developmental disability system operates within a flawed federal Medicaid framework, implemented differently in every state and dependent on state match dollars that perpetually place Concord in conflict with Washington. Meanwhile, real people remain trapped in the gaps.

At the same time, New Hampshire is aging faster than almost any state in the country. Without a stable workforce and robust, community-based services at a scale and cost that make sense, we are heading toward an epidemic of unsafe, unsupported aging in place, particularly in rural and lower-income counties. The ripple effects will be felt across healthcare, housing, emergency services, and families statewide.

We continue to treat disability services, aging services, mental health, healthcare, substance use disorder treatment, and education as competing priorities rather than interconnected human needs. Add fragile school funding, long-standing litigation, and rising demand across every sector, and "broken" scarcely captures the reality.



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Acknowledging Harm...and Responsibility

Nothing excuses abuse, neglect, or exploitation. What has happened, and continues to happen, is indefensible.

But allowing responsibility to be fragmented across changing oversight models has made it easier for administrators at every level to assign blame elsewhere rather than confront the cumulative impact of policy decisions made over many years. Responsibility has been redistributed, but accountability has not been strengthened.

New Hampshire is a beautiful state with extraordinary people and immense potential, but we are deeply broken in how we care for our most vulnerable citizens.

This is a “the sky is falling” moment, not rhetorically, but morally. These are human beings.

Choosing a Different Path

We have the knowledge, the experience, and the people needed to build something radically better. What we have lacked is sustained political will: to fund systems adequately, to break down silos, and to design oversight that actually improves safety rather than merely documenting failure.

We can choose a different future, but only if we are willing to confront the truth of the one we have built.

Respectfully submitted,

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