		A	approved	June 26,	1992 Date	- Marian
MINUTES OF THESEI	NATE COMMITTEE ON		EDUCATI	ON		•
The meeting was called to or	der by	SENATOR	JOSEPH Chairperson	C. HARDE	R	at
1:30	Monday, April 6		, 1992	in room 1	23-S	of the Capitol.
All members were present ex	cept:					

Committee staff present:

Mr. Ben Barrett, Legislative Research Department

Ms. Avis Swartzman, Revisor of Statutes

Mr. Dale Dennis, Assistant Commissioner of Education

Mrs. Millie Randell, Committee Secretary

Conferees appearing before the committee:

HB 3113 - Children and adolescents, interagency provision of services.

#### Proponents:

Ms. Carolyn Hill, Acting Commissioner, Youth and Adult Services, State Department of Social and Rehabilitation Services

Opponents:

Representative Darlene Cornfield, representing Ms. Mary Jo Heiland, Wichita, editor of Educational Research Institute's LAMPLIGHTER and "Alerts"

Chairman Joseph C. Harder called the meeting to order and reminded members that the Committee would continue its hearing on <a href="HB 3113">HB 3113</a>, relating to the creation of interagency councils to coordinate services for children and adolescents who receive services from more than one agency. He noted that recent Committee discussion has indicated that the bill is more complex than originally anticipated and may need to be amended. He called upon the first conferee, Ms. Carolyn Hill.

Miss Hill, Acting Commissioner, Youth and Adult Services, State Department of Social and Rehabilitation Services, explained that she is appearing today in strong support of  $\underline{\text{HB 3ll3}}$  on behalf of Ms. Donna L. Whiteman, Secretary, State Department of Social and Rehabilitation Services, who was unable to attend today's meeting.

Ms. Hill stated that "it is in the state's best interest to formalize a system of interagency coordination/collaboration, because it is right for children and their families and because it could lead to eligibility for increased federal revenues available to assist states in their efforts to serve children".

Ms. Hill indicated a need to address those situations wherein groups already exist for the purposes stated in  $\underline{\text{HB 3113}}$ .

Ms. Hill suggested that the Committee amend  $\underline{HB}$  3113, and her recommendations are found in her written testimony ( $\underline{Attachment}$  1).

The Chair recognized Representative Darlene Cornfield, who explained that she is speaking on behalf of a constituent, Mary Jo Heiland, Wichita. Testimony submitted by Ms. Heiland stated opposition to passage of <u>HB 3113</u>. Ms. Heiland cautioned that it would be dangerous to the family and to Western civilization founded on the concept of the family to give SRS such broad control of all people working with a child. (<u>Attachment 2</u>)

Responding to a question, Representative Cornfield acknowledged that she does have concerns with some of the bills coming before the legislature this year which tend to take control of a child away from the family.

#### CONTINUATION SHEET

MINUTES OF THE	SENATE	COMMITTEE ON	EDUCATIO	N
100 C	1 - 20	<b>.</b>	Monday Amila	,
room 123-S Stateh	ouse, at	xaxan./p.m. on	Monday, April	192

Following a call for additional conferees, the Chair reverted Committee attention to a motion on the table from the previous meeting. He explained that a conceptual motion had been made by Senator Parrish and seconded by Senator Montgomery to add "group home" to the definition of either "Agency" or "Parent" and to require that an annual report be made to the Joint Committee on Children and Families (as well as to the Kansas Commission on Children).

Senator Parrish requested that her motion be modified by adding "foster care provider" under the definition of "Parent" (and to require that an annual report be made to the Joint Committee on Children and Families.) Senator Parrish explained that she would like the definition of "Parent" to include both foster parents and group home representatives who are "acting as parents". Senator Karr seconded the amended motion.

When the Chair called for the question, he announced that the motion had carried and the amendment was adopted.

The Chair called Committee attention to amendments which had been recommended by Mr. E. W. Rakestraw, representing the Association of Community Mental Health Centers of Kansas, Inc., at the Committee's last meeting. (Attachment 3)

When the Chair asked the Committee's pleasure, <u>Senator Parrish moved that HB 3113 be amended by adopting item No. 2) on Page 2 in the recommendations suggested by Mr. Rakestraw. (Attachment 3) Senator Frahm seconded the motion. The Chair ruled that the motion had carried and the amendment was adopted.</u>

Senator Parrish moved that the Committee adopt item No. 3), Page 2 (Attachment 3), in the recommendations suggested by Mr. Rakestraw. Senator Karr seconded the motion, and the amendment was adopted.

The Chair called for the Committee's pleasure regarding item No. 4), on Page 2 ( $\underline{\text{Attachment 3}}$ ), but no motions were made.

When the Chair asked the Committee's pleasure on the next item, <u>Senator Parrish moved that HB 3113 be amended as stated in item No. 5), Page 2, of Attachment 3. Senator Kerr seconded the motion, and the amendment was adopted.</u>

When the Chair called for additional discussion and/or action, Senator Parrish moved that HB 3113 be amended on Page 2, line 42, by striking the words "monthly and more" and inserting the words "and" and "as" as indicated on the balloon version of HB 3113 submitted by Ms. Hill. Senator Frahm seconded the motion, and the amendment was adopted.

Senator Parrish moved to amend HB 3113 on page 2, (new) Sec. 3., line 23, and on page 2, (new) Sec. 4., line 31, by striking "provide" and inserting in lieu thereof the words "coordinate or assure delivery of" preceding the word "services". Senator Karr seconded the motion, and the amendment was adopted.

Responding to Committee concern, both Ms. Hill and Mr. Rakestraw indicated that there would be no additional fiscal impact associated with the amendments adopted by the Committee. Ms. Hill indicated there could be a possible monetary reduction.

Committee expressed concern regarding Mr. Rakestraw's first item on his recommended list for amending  $\frac{HB}{O}$  3113, because it may conflict with current law which mandates provision of special education services regardless of available funding.

Senator Parrish moved and Senator Frahm seconded the motion to recommend HB 3113, as amended, favorably for passage. The motion carried.

The Chair adjourned the meeting.

#### SENATE EDUCATION COMMITTEE

TIME: 1:30 p.m.	PLACE: 123-S	DATE: Monday, April 6, 1992
	GUEST LIST	
NAME	<u>ADDRESS</u>	ORGANIZATION
on da Weber	405 N. Sedgwic	K Burton High School Page
Janda BingHam	210 N. Colorado	BURRTON High School Page
ERALD JENDERSON	TOPEXA	USA of LS
TONI WHEELER	Topeka	Sen. Karr's ofc.
Dyb Rakestrim	. 11	ASSOC: of Community Mental Health Contins
Bob Rios	401 S.W. Topeka	KS. DEPT. OF HUMBU KESOUKCES
nartha Hodgesnith	· Topele	Ks. Ass=c Relab Services
Jun Alley		McGille Assec
Betty M. GLOVER	Topek	KANSAS ACTION for Children
Rep Darlene Countrell	,	Representative
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Paul M. Klotz	TOPEKA	ASSED OF CMHCS RE, Inc.
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### DEPARTMENT OF SOCIAL AND REHABILITATION SERVICES Donna L. Whiteman, Secretary

Senate Committee on Education Joseph C. Harder, Chairperson April 6, 1992

An act enacting the interagency provision of services for children, adolescents and families act.

Mr. Chairman, Members of the Committee, I am appearing today in support of House Bill 3113 which creates regional interagency councils to collaborate in the provision of services for children and adolescents who require multiple levels and kinds of specialized services which are beyond the capability of one agency. This testimony is presented jointly by Mental Health and Retardation Services and Youth and Adult Services.

We strongly support the concept of interagency coordination. Local community coordination and cooperation of various services delivery agencies to assist families in meeting the needs of their children fits squarely with the SRS Family Agenda and is an interest held by all of us who are serving families and children and who are sometimes faced with needs beyond our individual capacity to address. The Governor's Mental Health Services Planning Council lends additional support to the concept.

It is in everyone's best interest to have a structure for interagency coordination. At the present time we have a fragmented system that has a tendency to provide services in the most restrictive settings. This fragmentation occurs because the needs of the children described in this bill exceed the capacity of of any single agency. With no formalized mechanism in place to insure coordination, these children often are referred to restrictive, expensive and out-of-home placements. These settings are limited in number and which results in children being "fit-into" vacant bed slots rather than programs adjusting to the individual needs of the children. Failure to address the needs of these children at the local level can only result in the need for increased numbers of restrictive settings and children being removed from their own homes and communities.

It is not, however, in anyone's best interest to create overlapping and duplicating functions. The strong interest of the legislature in providing vehicles for such collaboration is evident by the number of bills introduced in the House and Senate to create planning, oversight, coordinating and service delivery groups, councils and committees. I have attached a chart to your copies of this testimony which lists legislative proposals we have identified that create councils, review boards and committees designed to better serve families and children. Ideally, the best of each of the proposals could be molded into a single over-arching plan that clearly establishes the intent and goals but at the same time allows for the utilization of existing avenues for interagency coordination and collaboration. Our local area staff report that there is a great deal of interest in planning groups at the local community level. This is evidenced by the number of communities (25 to 30) who have formed or who are in the process of forming Multi-diciplinary Child Abuse Teams. In addition at least two communities have foster care review teams.

EDUC . 4/26/92 A1-1 Page 2 HB 3113

It is in the state's best interest to formalize a system of interagency coordination/collaboration because it is right for children and their families and because it could lead to eligibility for increased federal revenues available to assist states in their efforts to serve children. Legislation has been introduced in the U.S. Congress that, if enacted, would make substantial amounts of funds available to states on a competitive basis to compete for the development of children's services. However, states will not be eligible to compete for the funds unless there is a system for interagency coordination in place. Kentucky, Vermont, North Carolina, Ohio and certain counties within California have employed this concept.

The amendment authorizing the SRS area director the flexibility of appointing a designee of the director goes a long way in making this mandate more manageable and we appreciate this consideration. When we discussed the provisions of this bill with our Area Directors they verified that in many rural areas monthly meetings would not be indicated. Therefor we urge that Sec. 4.(c) be changed as follows: Each regional interagency council shall establish its own internal procedures and shall meet  $\frac{1}{2}$ 

We recommend the passage of this bill with amendments to address the concerns expressed.

Donna L. Whiteman Secretary Department of Social and Rehabilitation Services (913) 296-3274

> EDUC 4/6/92 A1-2

PTII	INTRODUCED BY	MEMBERSHIP	SUMMARY
HB 2690 Creates a joint committee con children & families	Special Committee on Children's Initiatives	Five members from senate and eight members from house	Evals progress on implementing rec from 1991 children's initiatives; oversees devel. of outcome measures, rec. minimum income for standard of living of KS families; reviews policies, makes recs. & introduces legislation.
HB 2712 Creates local interagency councils for children with severe emotional disorders	SRS Task Force	1 staff member of SRS area office "to be in charge of working with area children's councils"; parent(s) of child, representatives from CMCCTR, school, court services system and 1 parent of another child and "other".	Determines what services are necessary to maintain the child at home.
HB 2987 (amended) Creates local citizen review boards/duties of C & Y Adv. Comm.	16 Representatives	3-7 members of community that is repr. of SES and ethnicity in each judicial district as appointed by Adm Judge	Reviews CINC Petitions/Adjudications, evals progress, suggests alternatives, recs to judge. Includes duties of C & Y Adv. Comm. Fees from birth certificates/C.Trust Fund
HB 3137 Creates county school attendance review boards	Committee on Judiciary	Parent(s); reps from school districts; county SRS; superintendents of county school, law enforcement, community-based youth svc ctrs; school guidance personnel & "other".	Promotes cooperation between agencies; reduces duplication of svcs for youth with school attendance and behavior problems Can also have local school attendance bds.
SB 655 Creates Children's Comm. svcs planning group per judicial district	Sen. Parrish	Adm Judge responsible for establishment; no guidance on mem.	Develops needs assessment for svcs for CINC's & JO's, identifies local and state svcs avail & promotes collaboration and devment. Submits plans to C & Y/JO Adv Com
SB 660 Creates KS Citizen Review Bd	Committee on Judiciary	15 members appointed by KS Supr. Ct.: 3 from each cong. dis.; 3 from state at large; 1 mem from ea dis.	Rcvs rpts from local citizen review bds rvws effectiveness, approp. data being monitored, rpts to Supr Ct, determines funding for local bds (includes duties of local bds and a local citizen review bd adv committee
HB 2010 Creates KS Children's Servs Planning Comm.	Special Committee of Judiciary	17 members: Sec of SRS, H&E, HR; Com of Ed.; 1 urban dis. judge; 1 rural dis. judge; 4 mem of legis.; 7 public.	Dev. coordinated system of services, reviews current public svcs avail & makes rec and specifies what agenices (public and privace) are best suited to provide svcs
HB 2542 Creates Gov. Comm & local comm on children, youth & families	Comm on Fed & St Affairs	Sec of SRS, H&E, HR, Corr; Comm of Ed.; Chief Justice of KS Supr. Ct.; 5 mem appointed by governor	Rvws policies, studies problems and dev. state policy/plan for svcs to children, youth & families. Identifies needed policy changes, pub. rpts and rvws programs for compliance
HB 3113 Creates regional inter- agency councils	Committee on Education	SRS Area Dir.; reps of other agencies parents; comm. business reps and "other"	Rvws cases, develops plans, identifies svcs needed and plans to develop svcs, est. interagency agreements and rpts

#### As Amended by House Committee

Session of 1992

#### HOUSE BILL No. 3113

By Committee on Education

2-25

AN ACT enacting the interagency provision of services for children, adolescents and families act.

Be it enacted by the Legislature of the State of Kansas:

Section 1. This act shall be known and may be cited as the interagency provision of services for children, adolescents and families act. It is the purpose and intention of this act to provide for regional interagency councils which will collaborate in the provision of services for children and adolescents in this state who require multiple levels and kinds of specialized services which are beyond the capability of one agency. Such services shall be provided in accord with the identified needs of each such child or adolescent, and in the least restrictive environment.

See. 2. The legislature hereby declares that the state is ultimately responsible for meeting the educational, health, mental health, and welfare needs for every child and every adolescent in the state. With the dwindling of resources it becomes imperative that all Kansas agencies coordinate the existing resources so that the needs of Kansas children and adolescents can be met. Therefore, it is the purpose and intention of this act to provide for regional interagency councils which will collaborate in the provision of services for children and adolescents in this state who require multiple levels and kinds of specialized services which are beyond the capability of one agency. Such services shall be provided in accord with the identified needs of each such child or adolescent, and in the least restrictive environment.

Sec. 3 2. As used in this act:

(a) "Children and adolescents who require multiple levels and kinds of specialized services which are beyond the capability of one agency" means children and adolescents who are residents of Kansas, and with respect to whom there is documentation that: (1) Various agencies have acknowledged the need for a certain type of service and have taken action to provide that level of care; (2) various agencies have collaborated to develop a program plan to meet the needs

EDUC 4/6/92 A1-4 

- of the child or adolescent; and (3) various agencies have collaborated to develop programs and funding to meet the need of the child or adolescent, and that existing or alternative programs and funding have been exhausted or are insufficient or inappropriate in view of the distinctive nature of the situation of the child or adolescent.
- (b) "Agency" means and includes county health departments, area offices of the department of social and rehabilitation services, district offices of the department of health and environment, local offices of the department of human resources, boards of education of public school districts, community mental health centers, community facilities for the mentally retarded/developmentally disabled, district courts, county commissions, and law enforcement agencies.
- (c) "Authorized decision makers" means agency representatives who have the authority to commit the resources of the agency they represent in the provision of services to any child or adolescent whose needs are brought before a regional interagency council.
- (d) "District court" means the administrative judge for a judicial district.
- (e) "Parent" means a natural parent, an adoptive parent, a stepparent or a person acting as parent of a child or adolescent for whom services are needed from more than one agency.
- Sec. 4 3. There is hereby established a system of regional interagency councils to provide services for children and adolescents who require multiple levels and kinds of specialized services which are beyond the capability of one agency. The secretary of social and rehabilitation services shall adopt rules and regulations to implement the provisions of this act.
- Sec. 5 4. (a) The director, or an appointed designee of the director, of each area office of the department of social and rehabilitation services shall convene a regional interagency council to provide services at such area office to children and adolescents who require multiple levels and kinds of specialized services which are beyond the capability of one agency. The director, or the appointed designee of the director, shall serve as chairperson of the council convened by such director or designee.
- (b) Each regional interagency council shall consist of: (1) Authorized decision makers who are representative of agencies; (2) parents; (3) community business representatives; and (4) such other as directors of area offices of the department of social and ilitation services may determine.
- (c) Each regional interagency council shall establish its own internal procedures, shall meet / how they and had rejoiten as needed to:
  - (1) Review all cases referred to them by one of the agencies

- represented or by a family member;
- (2) develop a plan, negotiated with a family member and, where appropriate, the child or adolescent, for the provision of services to the child or adolescent and family whose case has been referred. This plan shall include a description of each needed service and shall specify the agency responsible for providing the service within the timeline specified by the council;
- (3) maintain information sufficient to assess the effectiveness of the interagency council in meeting the service needs of children and adolescents and their families;
- (4) make an annual report to the Kansas commission on children, youth and families regarding the local assessment;
- (5) determine what service needs are not being met in their region and develop and plan to meet these service needs;
- (6) make an annual report to the Kansas commission on children, youth and families regarding the service needs which are not being met and the plan to meet these service needs;
- (7) establish interagency agreements as necessary for coordination of services to children and adolescents and their families who are served by more than one agency;
- (8) refer any problems with service coordination to the Kansas commission on children, youth and families; and
- (9) ensure that members of the council receive training in collaborative teaming as needed.
- Sec. 65. This act shall take effect and be in force from and after its publication in the statute book.

April 6, 1992

Senator Harder and Members of the Education Committee

Re: HB3113

My name is Mary Jo Heiland, wife and mother as well as the editor of the Educational Research Institute's LAMPLIGHTER and the weekly "Alerts" you have been receiving with background information on "Children's Legislation."

HB 3113 which would give the Social and Rehabilitation Services chief in each county the ability to draw together a council of all people working with a child-from schools to courts to mental health agencies-for the purpose of coordination, is dangerous to the family and dangerous to Western Civilization, founded on the concept of the family.

The legislature will have created a centralized power that will operate out of its control (as a matter of fact, people who are suffering through commission and omission activities of SRS could appear before you by the thousands with their tales of grief and woe), and the legislature is placing our children in jeopardy.

The Department of SRS has long been involved with agencies of questionable reputation-such as Planned Parenthood and Kansas Action for Children with its U.N. roots. The idea of separating children from their parents using public power and monies is certainly not new, nor is it merely an idea. I have personally debated and appeared on podiums with SRS officials making joint presentations with these questionable groups, and the fact that "Keys for Networking" appeared to testify for HB 3113 in the House during hearings indicates that quasi governmental bodies playing around with public power and monies will be attached to the SRS, if not actually on their Council.

Time and again I and other mothers concerned for their children and their Christian faith have tried to warn you that we have attended seminar and meeting planning that is representative of a state moving to claim and control "its" children. Time and again we have tried to warn you that the meeting attendance reveals to us a Plan for Socialism that will allow mothers and fathers access to their children only if we ourselves "relearn" so that we do not upset what is clearly indoctrination rather than education in the state schools. You either are in favor of a state controlled populace, or else you do not believe because you are blinded

EDUC 4/6/92 A2-1 as it says in Scripture.

Either way, those of you who are mothers and fathers will share in the grief of us all; perhaps your share will be even larger, for you will have handed the children over, and the family unit will no longer exist as the foundation of a Christian order-we will be like the rest of the world that depends on and obeys (not God) but the state for food, jobs and favors. It will not be a state that you know-elected bodies of representatives like yourself, for those who rule out of faceless "councils" are on everyside of you now, and you are passing the laws this very session that will render your own jobs irrelevant.

As a beginner to hold back this "powerlessness to the people" tide the legislature is riding, please do not give SRS this new centralized authority and power over us. Despite the fact that most of us don't believe you are listening or understanding-we would prefer to try and reason with you.

Thank you,

Mary Jo Heiland
5407 Sullivan

Wichita, Ks. 67204

(316)838-1505

EDUC 4/6/92 A2-2



## Association of Community Mental Health Centers of Kansas, Inc.

835 SW Topeka Avenue, Suite B, Topeka, KS 66612 Telephone (913) 234-4773 Fax (913) 234-3189

# TESTIMONY ON H.B. 3113 To: Senate Education Committee By E.W. (Dub) Rakestraw

April 1, 1992

John G. Randolph President Emporia

Eunice Ruttinger President Elect Topeka

Ronald G. Denney Vice President Independence

> Donald J. Fort Secretary Garden City

Don Schreiner Treasurer Manhattan

Dan Watkins Member at Large Lawrence

> Kermit George Past President Hays

Paul M. Klotz Executive Director Topeka Mr. Chairperson and members of the committee, I appreciate the opportunity to provide you with my comments on HB 3113. Because of the rapidity in which the bill was assigned and then heard in the House, we were unable to testify. We had hoped that the recommendations made by SRS to the House committee would all be incorporated and, thus, reduce the need for recommending amendments on this bill. Unfortunately, not all of the SRS recommendations appear to have been incorporated.

We are very supportive of effective measures to reduce the fragmentation of services to children and to enhance collaborative efforts between community agencies. It appears that is the general intent of HB 3113 and, therefore, we support the general intent of the bill.

However, to make the bill truly effective, we believe its current form should be amended in the following ways:

In the original HB 3113, there existed a Sec. 2. which, among other things, stated that the state was ultimately responsible for meeting the educational, health, mental health and welfare needs for every child and adolescent in the state. This section was deleted subsequent to testimony by SRS that this statement created liability implications that may not be comfortable or realistic. We would submit that with this section deleted, the liability has simply been passed to the regional interagency councils as currently expressed in Sec.4-3 and Sec.5-4. More specifically, it appears the specific agencies represented on the council could/would be held responsible for providing "each needed service". There is no recognition anywhere in the bill that it is understood and acceptable "that each needed service" may, in fact, not be available regardless of whether the council meets and determines what services are needed. The difference between services needed and services which realistically could be provided may be vast. To satisfactorily address this potentially very significant liability, we would recommend that at the end of Sec.5-4 (c) (2) the following be added: However, under no circumstances will an agency be held responsible for providing a service for which appropriate funding does not exist.

> EDUC 4/6/92 A3-1

- 2) Sec. 4-3 currently indicates the interagency council is to provide services. We submit that the council is not a service providing entity itself. We recommend that the first sentence of this section be revised to read as follows: There is hereby established a system of regional interagency councils to coordinate or assure delivery of services for children and adolescents who require multiple levels and kinds of specialized services which are beyond the capability of one agency.
- 3) In some communities (such as Topeka) there are already councils or committees serving this purpose. However, their structure may not be exactly the same as that contained in this bill. This bill as currently written could be interpreted to mean efforts we developed with much hard work over the past several years must be abandoned because of this new mandate. We would hope that would not be the case. We would recommend that the following be added to Sec. 5-4(a): However, in those areas where the Secretary of Social and Rehabilitation Services agrees that councils or committees already exist for the purpose of enhancing interagency cooperation and collaboration of service delivery, a new interagency council as described herein does not need to be created.
- 4) Sec. 5-4 (c) (1) indicates <u>all</u> cases referred by agencies or by a family member must be reviewed by the interagency council. This does not specifically allow for prior consideration to be given to determine the actual need for a review by an interagency council. Thus, cases could be referred without any assurance that prior efforts had really been made to coordinate multiple services and to assure the case actually required a review by the council. We would recommend that the following be added to this subsection: <u>However</u>, <u>prior to a case being submitted to the interagency council for review</u>, the person chairing the interagency council must be satisfied that the case is one appropriate for interagency council review.
- 5) Human service agencies, generally, have in common a critical need to practice strict confidentiality requirements. In many instances, and specifically for community mental health centers, there are state statutes requiring our maintenance of confidentiality. HB 3113 does not address the issue of confidentiality. We would recommend that the following subsection be added to Sec.5-4: (d) Each regional interagency council and its members are responsible for maintaining confidentiality by securing appropriate authorizations for release of confidential information within the council from the individual(s) who have legal responsibility for the child or adolescent.

6.) Finally, we believe that the prior number of cases (300-600) estimated as perhaps needing to be reviewed by interagency councils may be grossly underestimated. SRS has estimated that there are over 5,000 children/adolescents in Kansas who have severe emotional disorders. This one, single special population invariably requires multiple services from multiple agencies. There are, of course, many other special populations that potentially meet the definition of those who could be reviewed by the interagency councils. We are concerned that no fiscal review has been considered regarding the potential cost to local service agencies for staffing these interagency councils. We are aware that SRS, in testimony provided to the House committee, estimated an annual staffing cost to each area SRS office of \$87,552. A similar cost could also be incurred by each mental health center in the state who would send staff to the interagency council meetings. It is not uncommon for a mental health center catchment area to be served by multiple SRS area offices. Thus, some centers would have to staff several regional interagency councils. In cases like the High Plains Mental Health Center in Northwest Kansas, they have a 20 county catchment area. Staffing and travel demands could be unmanageable. Most centers in Kansas have multi-county catchment areas. Because there would be multiple agencies represented on the councils, the fiscal implications could be very significant.

Again, the Association of Community Mental Health Centers of Kansas support efforts to enhance collaborative service systems. We hope you'll incorporate our recommendations into HB 3113. Thank you for consideration of our comments.