



**Ottawa**  
1516 Davis Road Suite A  
Ottawa, KS 66067  
Phone: 785-242-5035  
Fax: 785-242-2118

**Burlington**  
1415 6th St.  
Burlington, KS 66939  
Phone: 620-364-2151  
Fax: 620-364-8062

**Osage City**  
532 Holiday  
Osage City, KS 66523  
Phone: 785-756-4321  
Fax 785-504-1002

---

**To:** Chair Tarwater and Members of the House Committee on Commerce, Labor and Economic Development

**From:** COF Training Services

Rachel Neumann, Chief Operating Officer

**RE:** Neutral Testimony on House Bill 2310

**Date:** 2/10/25

Chair Tarwater and Members of the Committee,

Thank you for the opportunity to provide testimony on House Bill 2310. My name is Rachel Neumann, and I serve as the Chief Operating Officer at COF. Our organization provides essential services and supports to individuals with intellectual and developmental disabilities (IDD) across Kansas. While the intent of HB 2310 to enhance the professionalism of the Direct Support Professional (DSP) workforce is commendable, there are several areas that require further consideration to ensure the bill is both practical and beneficial for the individuals and organizations it seeks to support.

#### **Concerns with the Proposed DSP Training Requirements**

Section 3(c) of the bill calls for the adoption of the National Alliance for Direct Support Professionals (NADSP) e-Badge Academy or a similar certification program. While we support professionalizing the DSP workforce, the implementation of such programs must consider the financial and administrative burden placed on providers.

Our agency has participated in the DSP+ Registered Apprenticeship program, which offers a structured and nationally recognized professional development pathway for DSPs at no cost to them. Despite being free, the program has taken years for us to fully implement due to the significant administrative time and oversight required. Any additional certification mandates, especially those without dedicated funding, risk placing further strain on an already under-resourced provider network. It is critical that participation in such programs remain voluntary and that financial resources be allocated to support implementation if certification is required.



**Ottawa**  
1516 Davis Road Suite A  
Ottawa, KS 66067  
Phone: 785-242-5035  
Fax: 785-242-2118

**Burlington**  
1415 6th St.  
Burlington, KS 66939  
Phone: 620-364-2151  
Fax: 620-364-8062

**Osage City**  
532 Holiday  
Osage City, KS 66523  
Phone: 785-756-4321  
Fax 785-504-1002

---

## **Challenges with Self-Direction Expansion**

We fully support the principle of giving individuals greater choice and control over their services. However, we have seen firsthand the challenges faced by individuals who opt for self-directed services due to gaps and lack of support that exists in this program. Many individuals who elect for self-directed care struggle with retaining support workers, scheduling and attending medical appointments, getting support with managing medications, and having consistency with critical everyday supports such as getting to the grocery store and keeping up with health and hygiene. In some cases, our agency has continued to assist with medication management for individuals who transitioned from agency-directed services to self-direction, ensuring their prescriptions remain filled and accessible. This was a direct response to us seeing individuals we used to support going months without medication refills and experiencing significant health concerns as a result.

We have also frequently stepped in to help individuals with grocery shopping and critical errands after they have been left without a worker for extended periods. At times, we have taken it upon ourselves to help them find and recruit workers due to the lack of support they have received with this task in their self-directed program. The state must address these gaps in support before expanding self-directed services. Without appropriate safeguards, resources, and training, individuals will likely continue to experience disruptions in care that could impact their health and well-being.

## **Concerns Regarding Provider Participation in State Healthcare Plans**

State-sponsored healthcare for providers is already an option, and our agency participated in this program for many years. However, we ultimately found it to be financially unsustainable. Over time, mandated employee and employer contributions increased significantly, making it cost-prohibitive for both the agency and our employees. Since transitioning away from the state plan, we have been able to offer employees the same level of coverage at a lower cost, improving affordability and accessibility for our workforce.

Before moving forward with any legislative changes related to healthcare participation, a comprehensive cost-benefit analysis should be conducted to determine the true financial impact on providers and employees.

## **Conclusion**

While HB 2310 presents opportunities to strengthen the DSP workforce and expand service options for individuals with IDD, several key areas require further examination and refinement. Any new workforce development initiative must be adequately funded and administratively feasible for providers. Additionally, the expansion of self-directed services must be accompanied by meaningful safeguards to



**Ottawa**  
1516 Davis Road Suite A  
Ottawa, KS 66067  
Phone: 785-242-5035  
Fax: 785-242-2118

**Burlington**  
1415 6th St.  
Burlington, KS 66939  
Phone: 620-364-2151  
Fax: 620-364-8062

**Osage City**  
532 Holiday  
Osage City, KS 66523  
Phone: 785-756-4321  
Fax 785-504-1002

---

prevent service disruptions. Lastly, any discussion around provider access to state healthcare should be grounded in data that reflects the true cost implications for agencies and employees alike.

I appreciate the opportunity to provide testimony today and welcome the opportunity to collaborate on solutions that enhance services for Kansans with IDD while ensuring the sustainability of the provider network. Thank you for your time and consideration.

**Rachel Neumann**

Chief Operating Officer, COF