

**Testimony of D. Charles Hunt, M.P.H.  
To the Senate Committee on Public Health and Welfare  
Opponent for Senate Bill 234  
March 21, 2023**

Chair Gossage and Members of the Committee:

Thank you for the opportunity to provide written testimony in opposition to Senate Bill 234 regarding closed loop referral systems. Johnson County acknowledges the importance of safeguarding the social care information of individuals who entrust us to provide services to them. However, I would like to highlight several concerns we have about this bill:

- The requirement in SB 234 to obtain consent for each instance of referral is overly burdensome. We take great care to explain the referral process for our clients and patients, and we obtain their general consent to share their information with other providers for the purpose of coordinating care and services. However, it is not practical to obtain and document consent for each instance.
- We also are concerned about the broad and vague nature of the definition of “closed loop referral system” and the full potential implications of the bill.

Our Department and other departments in Johnson County have stringent policies and procedures in place to protect the privacy and confidentiality of our clients and patients, and we comply with applicable federal and state privacy laws. If enacted, this bill would create special privacy procedures for specific services and would cause additional burden and confusion for our clients and patients.

Thank you for your consideration.

Sincerely,



D. Charles Hunt, M.P.H.  
Deputy Director/Interim Director