

Dear Senate Health and Welfare Committee,

I am writing to share my concerns about HB 340a. For the past six years I have spent countless volunteer hours working to support various aspects of Idaho's system of care by providing parent voice and perspective. Currently through my work with Idaho Federation of Families, I spend several hours each week supporting families who are trying to navigate Idaho's children's behavioral health systems, including those seeking residential services for substance use treatment. Additionally I have personal experience seeking residential treatment for my own teenage daughter. I have a deep understanding of not only the challenges experienced by families but also the policy and system issues that play a role in these decisions.

The stated purpose of this bill is to address Idaho's "serious lack of residential substance abuse treatment for teens" by giving "an exemption from licensing" for a single "pilot program". While I support the need to increase access to substance use treatment for youth, I am highly concerned about the mechanism this bill uses to increase access.

The development of Youth Empowerment Services (YES - the system of care that is a result of the Jeff D. Settlement) has increased access to services for youth across the state. This has happened in three distinct ways: first more of our youth have access to Medicaid (this includes youth needing substance use treatment); secondly we have an increased number of providers offering services (for example Ashwood Recovery, Cottonwood Creek, and Tri-State Behavioral Health are all new substance use providers in the last three months) and we have an increased in the types of services that providers are able to bill for, including more intensive outpatient options which are evidence-based for treating youth with substance use disorder. YES has made a positive difference for families across the state and it will continue to do so as implementation continues to move forward.

Even with this increase in access, there are times youth need to be placed in residential treatment. One of the expectations parents have when making placement decisions is that the facilities will have some sort of oversight and protection. Oversight that will ensure best practices in clinical treatment and protection that will ensure safe and appropriate interactions with staff and peers. This bill creates a situation where that oversight and protection will no longer be a "given" within the state of Idaho.

Here are a few reasons why this is a concern for parents:

- \* There is no requirement in the bill that facilities inform parents they are unlicensed. Information is not provided to parents about the difference between a licensed and unlicensed facility so that they can make a fully informed choice about placement.
- \* There is no entity identified in the bill that can practically support a parent with an immediate concern regarding clinical practices or safety issues. Calling law enforcement or involving child protection is not best practice or even effective in these types of treatment situations. It's a last resort type of intervention.
- \* There is no due process identified to help parents when concerns about a facility become evident. Parents are left without recourse and protection while placing their child into a treatment situation when they are at their most vulnerable.

Additionally, there are specific concerns with regards to the facility identified in this legislation. Here are just a few of them...

- \* Youth being taken off psychotropic medications without proper oversight. Local providers have reported that adults in this situation at this particular facility have experienced serious health consequences as a result of this practice.
- \* Co-mingling of adults and adolescents in treatment and recreational settings.
- \* The use of this program by judges for youth on probation. Will this program be given as one of several options for youth by the court or will it be mandated (as was stated happens on the adult side)?
- \* Treatment of adults with pornography and sex addiction at the same facility as teenagers who may be as young as 13.
- \* Concern about youth of all faiths (or those who claim no faith at all) being able to participate in this program without discrimination or coercion.

Substance use and teen suicide remain challenging issues in Idaho. But they aren't issues that will be solved by allowing unlicensed facilities to begin providing treatment. I strongly urge you to vote against any bill that allows unlicensed youth treatment facilities in Idaho. Instead I'd like to invite those who want to treat youth to work with parents and system partners to identify any current licensing barriers and move forward in a way that continues to increase access to evidence-based treatment while protecting the rights of parents and youth.

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