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Idaho

National Alliance on Mental Illness

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March 10, 2020

*ATTACHMENT 2
3/10/2020*

The Honorable Fred S. Martin
P.O. Box 83720
Boise, Idaho 83720-0081

RE: HB 340, Child Care, Treatment Facility

Dear Senator Martin,

NAMI Idaho is opposed to HB 340. Allowing an unlicensed facility for the treatment of minors is a giant step backwards. There are enough problems in Idaho with facilities that are licensed. Removing licensing and oversight safeguards put our children at risk. Here are additional comments:

- While the bill says it would exempt other facilities operating before 2020, there are no criteria for being a pilot except the specific listing of the Good Samaritan Rehabilitation Program in Coeur d'Alene.
- A real pilot would have criteria for qualifying and would be evaluated by experts in Substance Use Disorder treatment.
- The "child protection legislative review panel" has no expertise in substance use treatment and no legislative mandate to evaluate Substance Use Disorder treatment. Their only purpose under current statute is to review reports by regional child protection review panels. They have no expertise in "developing a template" for children's Substance Use Disorder facilities.
- No authentic pilot would allow the project to evaluate their own success. But H340a appears to authorize facilities participating in a pilot, including the Good Samaritan Rehabilitation Program in Coeur d'Alene, to report on its own "success" (without even setting any criteria for success) and will operate without oversight or even reporting until July of 2023.
- There are no protections for either children's or parents' rights in an unlicensed facility. The resident, patients, and parental rights specified in Idaho Code 16-2425, 2426, and 2428 do not apply to unlicensed facilities.
- H340a does not require background checks for staff, separation of minors and adults, any clinical training for staff, even building codes and food storage and preparation standards do not apply.
- There are no restrictions on overcrowding or sleeping arrangements.

Please do not support or pass HB 340.

Sincerely,

Michael Sandvig, President
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