



February 29, 2008

To: Public Health Committee  
From: Terry Edelstein, President/CEO  
Re: CCPA Testimony

**S.B. 241 An Act Examining the Licensure System for the Department of Children and Families**

Please accept these comments with regard to S.B. 241.

CCPA advocates on behalf of children's mental health and addiction treatment providers. These organizations provide numerous services under contract with DCF including psychiatric clinics for children, also known as the child guidance clinics, emergency mobile psychiatric services, intensive in-home services, group home, residential treatment and other services that support children and their families.

Community-based children's service providers have worked positively with the licensure arm of DCF and would like to continue this productive relationship.

In 2006, we worked closely with DCF licensing staff to refine the interpretive guidelines for the DCF Outpatient Psychiatric Clinics for Children Licensing Regulations and held joint training to insure that licensing staff remained consistent in their interpretations and expectations and that service providers were clear about their roles and responsibilities in order to comply with licensure. This process was not without its struggles as licensing inspectors and providers sought to solidify compliance issues.

It was extremely helpful that the same state agency that licensed the providers also developed standards in contracts that were consistent with licensure requirements. DCF has a stringent licensing process that works to insure that vulnerable children and families receive high quality care. Their staff are uniquely skilled in assuring compliance with the numerous licensing provisions relating to mental health facilities for children.

Should the Committee move forward with a recommendation to study the feasibility of moving licensing responsibilities to DPH, we ask you to be explicit that the study committee include a minimum of three representatives of community providers associations. Section 1 (b) (2) gives the OPM secretary the ability to expand the membership of the committee without specifying the representation.

Suggested amendment:

**CCPA**

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17 Public Health, (B) two members who are employees of the Department  
18 of Children and Families,[and ](C) the Child Advocate, or a designee AND A  
REPRESENTATIVE DESIGNATED BY THE CONNECTICUT COMMUNITY PROVIDERS  
ASSOCIATION, A REPRESENTATIVE DESIGNATED BY THE CHILDREN'S LEAGUE  
OF CONNECTICUT AND A REPRESENTATIVE DESIGNATED BY THE CONNECTICUT  
ASSOCIATION OF NONPROFITS. In  
19 addition, the Secretary of the Office of Policy and Management, the  
20 Commissioner of Public Health and the Commissioner of Children and  
21 Families, or their designees, shall be ex-officio members of the  
22 committee with full voting rights.

Thank you for considering our recommendations.