

For SB 304

As the Program Director of Word of Life Counseling Center's Domestic Violence Treatment in Wichita, Kansas I have some concerns about the recent language added to SB 304. The bill now requires specific licensure by the Behavioral Sciences Regulatory Board, for the director of the program and those who do assessments. This, along with the need for our programs to be certified by the Attorney General's Office must be done prior to the passage of this bill. Our program is not currently certified, but has been engaged in that process. We need more time for our program to meet these standards for certification in this bill. We need more time to be able to take advantage of the 'grandfather clause' which would enable us who do not have a BSRB license to continue as a program director and be able to complete assessments. This bill goes into effect upon publication.

We as providers were told by the Attorney General's office that since certification must be completed <u>prior to passage</u> of this legislation, each provider applying for such must be handled on a first come, first serve basis. The reason for this is limited staffing at the AG office. This could mean that some of our programs will not get certified prior to the passing of this bill.

We then find ourselves in a difficult situation not being licensed with BSRB or certified as a program prior to this bill being passed. The dilemma we face is that we who have worked in this field for years will lose the ability to be a director of a program and the ability to do assessments. If we are forced to hire a licensed person to oversee our programs and do our assessments, we will then create a financial burden; that burden will be passed on to the offenders. Most of our clients are already having a hard time paying for treatment. The consequences of higher cost may cause more jail time for offenders who are unable to pay for treatment. Many professionals who have worked in this field who are highly qualified will find themselves unqualified due to licensure and lack of time for certification.

The process to be certified is not a small task. After submitting the initial application, if accepted, the AG's office will then set up an appointment with the provider at his place of business to make sure the program is compliant with the standards. If there is a deficiency, the AG's office will then have requirements to take care of the problem. This entire process, if not given the time needed, could create a void in our programs in Wichita, Kansas since most of our program directors are not licensed with BSRB. Our request is to have ample time for every Batterers Intervention Program applying for certification to have the chance to make that happen. If our programs are unable to function properly without interruption, we will find ourselves crippled to do the job so necessary to provide help for the perpetrator. Society then suffers.

Submitted by Rose Matzek MA, LAC