## Juneau Youth Services, Inc.

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March 30, 2013

Representative Bob Lynn State Capitol Room #108 Juneau, AK 99801

Re: HB 127

Dear Representative Lynn,

On behalf of Juneau Youth Services, I am writing to express our opposition to the proposed amendment to AS 24.55.330(2) under Section 12 of House Bill127. The amendment would extend the Ombudsman's oversight jurisdiction to residential treatment programs providing services to juveniles in the custody of the Department of Health and Social Services. This oversight function is unnecessary and duplicative of other oversight efforts.

As a behavioral health grantee for the state, Juneau Youth Services is required to become nationally accredited by June 30, 2015. We are preparing to receive accreditation through the Council on Accreditation. This is a very rigorous process that requires organizations to meet national standards for administration and service delivery; our residential programs need to meet or exceed these national standards.

In addition, our organization receives the following reviews and oversight:

- Annual licensing reviews through the Division of Public Health for all of our residential programs to ensure compliance with the state's residential child care center regulations
- On-site reviews through the state Office of Children's Services for residential programs
- On-site reviews through the state Division of Behavioral Health
- On-site reviews through the state Division of Juvenile Justice
- Medicaid audits to ensure compliance with state Medicaid regulations
- Review through the Disability Law Center as a "Protection and Advocacy" (P&A) agency with authority established through the U.S. Congress
- Reviews through the federal Administration for Children and Families for our runaway and homeless youth programs

In conclusion, residential treatment in Alaska is already heavily regulated; the proposed Ombudsman oversight under HB 127 is redundant and an unnecessary use of state resources.

Sincerely,

Walter Majoros
Executive Director