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BILL ANALYSIS

Senate Fiscal Agency

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Senate Bill 937 (Substitute S-2 as reported)  
Sponsor: Senator Jack Welborn  
Committee: Criminal Justice and Urban Affairs

Date Completed: 5-15-90

**RATIONALE**

Services for Michigan children "at risk" and their families are funded and delivered through three parallel public systems: the Department of Social Services (DSS), the Department of Mental Health (DMH), and the Juvenile Division of the Michigan Probate Court (juvenile court). Each of those public bodies has its own diverse system for the determination of eligibility, entry points into the service delivery system, and the funding of services. There appears to be very little coordination between the systems, and there reportedly are as many as 10 different complex funding formulas and little prospect of an influx of needed Federal, State, and local funding. Also, the ability of children and families to receive services often is contingent on their county of residence, since program availability and funding varies from county to county. Several studies in recent years have concluded that Michigan's system of children's service delivery is extremely fragmented and uneven, mismanaged, and applied poorly, resulting in some children "falling through the cracks" of service delivery. In addition, since children's services programs are located within various units of State and local governments, it has been claimed that those programs do not have the visibility necessary to command the attention that they deserve when decisions are being made for the spending of public money. Some people feel that, in order to provide for better funding and more efficient and effective delivery of services for children and families, the various delivery systems for those services should be coordinated under one State entity.

**CONTENT**

The bill would create the "Child and Family Services Act" to do all of the following:

- Specify certain declarations of the Legislature relative to State policy on children's services and create a joint committee of the Legislature to oversee the progress toward the bill's goals and mandates.
- Elevate the DSS' Office of Children and Youth Services (OCYS) to an autonomous agency, the "Child and Family Services Agency", within the DSS on October 1, 1991.
- Require the establishment, by January 1, 1992, of pilot projects in at least seven counties "to test models of a functionally integrated service system for the provision of child welfare, mental health, and juvenile justice treatment services". (The OCYS would have to establish a "pilot task force" by January 1, 1991.)
- Elevate the proposed Agency to an independent department of State government on October 1, 1995.
- Repeal certain Acts and parts of Acts.

**Declarations and Joint Committee**

The bill specifies that it would have to be "liberally construed to promote the physical, cognitive, and psychological well-being" of

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Michigan's children and families. The Legislature would declare that it is Michigan's policy "to provide an opportunity for every child...to reach his or her full potential", and the proposed Act would have the following purposes:

- To consolidate some child and family services and create a coordinating mechanism for others "to provide a continuum of care and avoid fragmentation of services", and to ensure that a core of services to provide that care was available statewide to all Michigan children and families.
- To increase accountability for service delivery and administration.
- To develop and administer "a racially and culturally appropriate" service delivery system to all children who were "abused, neglected, dependent, delinquent, developmentally disabled, or mentally ill, as well as those who have other emotional or physical needs".
- To assist families and children in developing the capacity to control their futures, and to emphasize early intervention and primary prevention services to avoid family and individual dysfunction.
- To strengthen Michigan families and encourage family life, and to ensure that each Michigan child was protected from abuse and neglect.
- To provide, through pilot projects, an opportunity to test models for the consolidation of all child and family services in a single State department.

The "Joint Committee on Children and Families" would consist of five Senators and five Representatives appointed, in the same manner as standing committees, for two-year terms. The position of chairperson would have to alternate between the two houses of the Legislature, beginning with the Senate. The Joint Committee would have to meet at least twice annually and could meet during a legislative session and during an interim between sessions. The chairperson or a member designated by the chairperson, upon a majority vote of members, could administer oaths, subpoena witnesses, and examine books and records of a person "involved in a matter properly before" the Committee.

The Joint Committee would have to monitor the progress of pilot projects and, by April 1, 1993, submit an interim report on them to the Legislature. The Committee also would have to review the pilot projects' evaluations and submit to the Legislature, by April 1, 1995, a report recommending legislation to implement statewide one or more features of the pilot projects in a "Department of Child and Family Services".

#### Child and Family Services Agency

The Agency would be within the DSS, but would be autonomous. The Agency would exercise its functions and powers independently of the DSS Director. With the advice and consent of the Senate, the Governor would have to appoint an Agency Director, who would be exempt from Civil Service classification. The Agency Director would serve as the Governor's special assistant on matters relating to families and children.

The bill would transfer all of the powers and duties of the OCYS to the proposed Agency. The powers and duties of the Department of Management and Budget's (DMB's) Office of Criminal Justice relating to juvenile justice services, also would be transferred to the Agency. In addition, the Advisory Committee on Criminal Justice (created by MCL 18.405), the State Child Abuse and Neglect Prevention Board (created by MCL 722.603), and the Domestic Violence Prevention and Treatment Board (created by MCL 400.1402) would be transferred to the proposed Agency. The composition and powers of those entities would not be affected by the bill.

The Agency would operate all State facilities for children that previously were operated by the DSS. Employees of county offices of the DSS who perform child and family services would be transferred to the proposed Agency in Berrien, Calhoun, Genesee, Ingham, Kalamazoo, Kent, Macomb, Muskegon, Oakland, Saginaw, and Wayne Counties. A proportionate share of support staff needed for child and family services also would have to be transferred in those counties. In other counties, the Agency and county departments of social services would have to enter into performance agreements to govern the administration of child and family services.

The bill would allow the Agency to enter into contracts for the provision of services, and require it to submit an annual State plan for child and family services to the Governor, Joint Committee, and Supreme Court. The Agency also would have to conduct research, enter into interstate agreements, and monitor and evaluate child and family services according to performance objectives and standards. In addition, the Agency would have to establish a special fund for primary prevention and early intervention services. In the first year, 2% of the Agency's budget would have to be dedicated to that fund and allocated solely for those services. Each year thereafter, 2% would have to be added until the total percentage of the budget spent on primary prevention and early intervention services reached 10%.

The "Office of Service and Facility Regulation" and the "Office of Recipient Rights" would be created within the Agency to license, regulate, and monitor child care organization and protect the rights, privileges, and benefits of service recipients.

The proposed Agency would have to develop and implement a statewide information system. The Agency would have to collaborate with the DMH and the State Court Administrator to develop the use of a uniform information system and to standardize terminology.

The Agency also would have to recommend to the Civil Service Commission personnel standards and procedures. State employees in child and family services positions would have to transfer to the Agency. The bill would require comparable compensation; allow the transfer of a maximum of 80 hours of annual leave, or more if otherwise provided by law; guaranty the transfer of accumulated benefits without diminishment or impairment; specify the entitlement of a transferred employee to receive insurance benefits not less than those received prior to transfer; and provide for the retention of a bargaining representative. A local government or court employee could not be transferred to the Agency unless funds were appropriated for that purpose and the transfer were agreed to by the county board of commissioners and the presiding judge of the county's probate court.

In order to coordinate children's services, the

"Children and Families Cabinet Council" would be created within the Office of the Governor. The Council would have to advise the Governor on issues related to children and their families and would have to submit to the Legislature, the Governor, and the DMB an annual list of budget priorities for children's services provided by all State departments and agencies. Another annual report, summarizing the previous fiscal year's total expenditures for services to children and families itemized by department, would have to be submitted to the Governor and the Legislature.

The Governor would have to designate a private advocacy organization to initiate a program for the advocacy and protection of the rights of children and families who were served by the Agency, local offices of the Agency, or contract providers. The advocacy organization would have to act as a "problem solver for all children and families and assist them in directing and communicating their concerns, problems, and needs to the appropriate governmental agency or department".

The Agency would be responsible for making available a list of core services "as needed to every county". Services would have to be delivered in the context of the family whenever that approach was consistent with the child's and the community's best interests. Further, the bill specifies that, when possible, a core of services would have to be made available to "all children and families, not just to those in crisis or at risk". Services would have to be "ethnically sensitive and culturally relevant to the unique needs of multiracial, multicultural, and multilingual populations" and based on an assessment of a child's or family's need for the services and not on categorical or financial eligibility.

The proposed Agency would have to establish a single fiscal management system and a unified funding system. The funding system would have to "subordinate eligibility to need". In cooperation with the Supreme Court, the Agency would have to establish a standard parent or guardian fee schedule for certain core services. For those services not covered by the fee schedule, parents and guardians would have to be charged for their "fair share" of costs based upon ability to pay. The Agency also would have to establish a juvenile justice

funding system, including the supervision of county child care funds. The Agency would have to distribute appropriated money to each county for the foster care of children in an amount equal to 50% of the county's annual expenditures from its child care fund. (The annual expenditures could not include money spent from a county's child care fund for maintaining children in the Michigan Children's Institute, for the costs of State wards pursuant to the Youth Rehabilitation Services Act, or for amounts in excess of an Agency-approved annual budget for foster care services.)

A county could not allocate less money for a program than it had allocated in the 1988-89 fiscal year. Funding disputes between counties and the proposed Agency pertaining to necessary increased costs of a new or increased activity or service required of counties could be resolved as required by Article IX, Section 29 (part of the "Headlee Amendment") of the State Constitution.

#### Pilot Projects

At least seven pilot projects would have to operate at the county level for three years, from January 1, 1992, to December 31, 1994. The proposed Agency and the local unit could agree, however, to extend the project until the proposed Department was established.

By March 1, 1991, the pilot task force would have to draft a request for proposal of participation, which would have to be provided to each county by April 1 of that year. Counties or groups of counties would have until July 1 to submit proposals. The task force would have to review proposals and recommend pilot project participants to the OCYS by September 1. The OCYS then would have to notify each county selected to participate by October 1. The proposed Agency and participating counties or groups of counties would have to enter into pilot agreements and begin operating pilot projects by January 1, 1992. The task force then would have to monitor the pilots' progress and make recommendations to the Agency, an independent evaluator appointed by the Governor, and the Joint Committee on needed changes to the projects.

Pilot projects would have to be established by

a voluntary agreement between the Agency and the board of commissioners for each county in the local unit (i.e., county or group of counties providing services). Based on local needs, the Agency would have to make available in each local unit that participated in a pilot project a group of core services. The Agency's local office in a participating county would be "responsible for functionally integrating children's mental health services and juvenile justice treatment services with other children's services in pilot counties".

Services would have to be provided consistent with standards and rules promulgated by the Agency, but the manner of service delivery and coordination in each local unit would be governed by the pilot agreement and the local plan and budget. The size and composition of the local unit board could be determined locally but would have to meet minimum standards specified in the bill. The board would have to recommend a plan and budget to the board of commissioners of each county in the local unit for approval of expenditures using local funds. The local unit's pilot project proposal would be considered the plan and budget for the first year.

Each local office of the Agency would be responsible for integrating, in pilot counties, children's mental health services and juvenile justice treatment services with other children's services. Local offices also would have to establish a "central community resource repository and information clearinghouse" for family and child services in the local unit. A local office also would have to distribute a "local service directory" to identify all child and family services available within the local unit regardless of the service provider.

In order to evaluate the effectiveness of various financing alternatives, pilot projects would have to operate under either a "combined reimbursement" formula or a "differential reimbursement" formula. Combined reimbursement would include payment of all costs, up to the level specified in the pilot agreement, at 72% State and Federal and 28% local, and payment of all costs beyond the specified level at 50% State and Federal and 50% local. Differential reimbursement would

include all of the following:

- Payment of foster care, funded relative placements, shelter care, private institutional care, children's psychiatric care, residential care, and all other costs considered out-of-home care up to the level specified in the pilot agreement, at 75% State and Federal and 25% local.
- Payment of costs for local administration, early intervention, primary prevention services, in-home services, and all other services not related to out-of-home care, up to the level specified in the pilot agreement, at 90% State and Federal and 10% local.
- Payment of out-of-home costs beyond the specified level at 50% State and Federal and 50% local.

If the juvenile court determined that the Agency had placed a child in foster care without making "reasonable efforts" to eliminate or prevent the need for the child to be removed from his or her home, or to make it possible for the child to return to the home, the Agency would have to pay 100% of the costs of services to that child in the 30-day period prior to the hearing at which the court made that determination.

In order to test the effectiveness of alternative approaches to consolidation of child and family services in each pilot project, the projects would have to be evaluated by the Agency, each county in a local unit, a county not participating in a pilot project (if it wished to participate in the evaluation), and an independent person or organization selected by the Governor. The Governor would have to appoint an independent evaluator by January 1, 1991, and the term of appointment would end after the submission of the final report and recommendation. Each person or organization participating in the pilot project evaluation would have to submit to the Joint Committee, by February 1, 1995, a report that included an assessment of the particular pilot project's experience relative to evaluation criteria specified in the bill, and recommendations pertaining to implementation of one or more of the pilot project operations in the proposed Department.

#### Department of Child and Family Services

On October 1, 1995, the proposed Child and Family Services Agency would be elevated to a "Department of Child and Family Services" (DCFS). The DCFS Director would be appointed by the Governor with the advice and consent of the Senate and would serve as the Governor's special assistant on matters concerning child and family services. One year after the creation of the DCFS, employees of county offices of the DSS who performed child and family services would transfer to the proposed new Department and a proportionate share of administrative support staff also would be transferred from county DSS offices to the DCFS. Local and court employees holding positions in child and family service programs could transfer to the DCFS, unless their program was continued under a contractual relationship with the Department.

The same powers and duties that the bill would assign to the proposed Agency would be transferred to the new DCFS, including the Offices of Facility Regulation and Recipient Rights, the provision of services, and personnel administration responsibilities.

The DCFS would have to provide all services related to the mental health of children and families that previously were provided by the DMH. The DCFS could enter into contractual agreements with the DMH and community mental health boards for the continuation of those services. In addition, the DCFS would have to provide certain juvenile justice services, either directly or by contract. After October 1, 1995, no Federal or State funds could be available to local governments to reimburse the local government for the provision of juvenile justice services unless the service was "managed, directed, or controlled by the court" under a contractual agreement between the DCFS and the local government.

Local offices of the DCFS would have to integrate functionally services provided for under the bill with other children's services, and their provision could be accomplished by contractual arrangements with local governments for court-provided juvenile justice services and with county mental health organizations for children's mental health services. After October 1, 1995, local units

would have to operate local offices under the differential reimbursement funding formula (the 75/25; 90/10; and 50/50 formula described above), unless the Legislature amended that formula based on recommendations of the Joint Committee on Children and Families.

### Repeals

Sections of the bill that would authorize the Agency to provide certain grants and specify that the county treasurer was the custodian of money provided for the Agency's and the juvenile court's use would be repealed on October 1, 1995. The bill also would repeal Public Act 181 of 1956, which provides for a boys' vocational school; Public Act 229 of 1962 and Public Act 145 of 1963, which provide for a conservation rehabilitation camp for male delinquent youths committed to the DSS; and Public Act 145 of 1965, which transferred Camp LaVictoire from the Department of Corrections to the DSS.

### BACKGROUND

Advocacy for the reorganization of children's services dates to at least 1973, and recommendations for the creation of a separate State Department of Children services were made as early as 1977. In 1973, the Michigan Legislative Council released a report entitled Michigan's Juvenile Justice Services that characterized the State's juvenile justice services as "uneven in their distribution throughout the state, varied in quality, generally underfinanced, [and] not developed within a framework of statewide priorities". Since that report was issued, numerous other studies have been conducted to evaluate the efficiency and efficacy of the administration, distribution, and delivery of services to children and their families. Each has contained similar descriptions and recommendations for the integration and coordination of all programs that offer services to children.

Some of the studies conducted in the last decade or so have assessed the attempt of Public Act 87 of 1978 to coordinate the administration and delivery of children's services. Public Act 87 was to have given the OCYS both greater visibility within the DSS and increased control over budget, policy, and program evaluation. In 1982, the Child

Welfare League of Services concluded that Public Act 87 had not been implemented fully and that the OCYS had not met all of the Act's mandates. The League's study further stated that the DSS had placed primary operational responsibility outside of the OCYS. The administration and delivery of children's services continued to be a part of the DSS county offices' function without direct involvement of the OCYS. Similarly, the DMH's study of children's mental health services, released in 1982, concluded that a "lack of coordination among and between state and local units of government working with children continues to be a major and seemingly intractable problem".

There have been at least 10 reports since 1973, including ones in recent years by the Riley Task Force and the Governor's Human Services Cabinet Council, which claim that services to children are fragmented and delivered unevenly throughout Michigan. Consequently, the reports have judged that children's ability to receive adequate services often is dependent on the county in which the child's family resides and the child's eligibility for specific categorically funded services.

### FISCAL IMPACT

The initial phases of this bill, the establishment of an autonomous child and family services agency and pilot projects in various counties, should have a minimal effect on GF/GP spending. However, Section 9111, which would require a 2%, increasing to 10% of total funding, set aside for primary prevention and early intervention services, could result in a substantial increase in Gross and GF/GP spending by the fifth year, depending upon its interpretation. In addition, county spending could increase by 12% on average for those counties acting as pilot sites based on the financing formulas contained in Section 25119.

The final phase contemplated by this bill, the creation of a Department of Child and Family Services, would probably: increase total spending by about 2% due to increased staffing requirements; reduce GF/GP by 2% as a result of the funding formula; and, likewise increase county spending by 12% on average. These estimates would increase, especially for total and GF/GP spending, depending on the

interpretation of Section 9111 as mentioned above.

Please note that only "percent" changes in funding have been used due to the problem of estimating what the total level of spending would be in five years. However, as an example, if this bill were effective tomorrow, it is estimated that the total budget, given the contents of the bill, would be about \$720,000,000 Gross or an increase of \$14,000,000 Gross. GF/GP spending would decline by \$7,000,000 from \$367,000,000 to \$360,000,000 and county spending would increase by \$15,000,000 from \$122,000,000 to \$137,000,000.

## **ARGUMENTS**

### **Supporting Argument**

As indicated by the numerous studies conducted to assess children's services in Michigan, the delivery system for those services is cumbersome, fragmented, and uneven from county to county. As a result, programs offering children's services in Michigan are in a state of disarray. Since various programs are offered by several different public entities, with no centralized administration or structure, there is little coordination, some overlap, and many holes in the service delivery system. Complaints that some children do not receive needed services because they "fall through the cracks" of the system are rampant. For instance, a child may not receive a particular service because it is not available in his or her county, while neighboring counties do offer the service, or because he or she doesn't meet categorical eligibility criteria and, consequently, the county can't receive any matching Federal funds for the provision of that service to that child.

The bill would correct the glaring inefficiency and inequity that are central to the current state of Michigan's delivery system for children's services. By centralizing all services presently provided by the DSS, the juvenile court, the DMH, and their local delivery systems under one State department and its local delivery system, the bill would ensure that the same core of services was made available to all children in the State regardless of where they live. The integration of those services also would provide a single point of entry into the

service delivery system, thereby alleviating the problem of individuals' being shifted from one bureaucracy to another and failing to receive needed services. Further, the bill specifies that services would have to be provided based on "a child's or family's need for the services, and not on financial or categorical eligibility", so that service could not be refused simply because a child's family did not meet the criteria for Federal funding.

### **Supporting Argument**

A public program's ability to obtain adequate funding often rests on its visibility within the structure of State government. Since children's services are provided by numerous programs located within several diverse State budget areas, the programs' visibility can be overshadowed by a particular department's broader mission. While most would agree that children's services generally are underfunded and that children are one of the most deserving groups for receiving public support, the very structure of State government renders children's services programs unable to receive the attention and funding that they deserve. Centralizing the programs that would provide children's services into one State department would put them in a better position to command attention during the annual State appropriation process and to secure needed funding.

### **Supporting Argument**

While the current system of providing children's services is disjointed, with seemingly independent and even uncooperative State and local components, the bill would develop a State-local partnership for the delivery of services to children and families. The bill sets forth a core list of services that the Agency/Department would have to make available to all children and families in the State and would establish a system of local unit boards that would decide how those services were to be provided within the local unit (i.e., a county or group of counties). The Agency/Department would have to enter into annual plan and budget agreements with each local unit board. This approach would allow local officials to decide how services would best be provided within their jurisdiction, while ensuring that the State had oversight as to the equitable and efficient delivery of services.

### **Supporting Argument**

Integrating all of programs for the delivery of children's services under one State entity would provide for increased accountability throughout the system. The current system is confusing and allows for misplaced accountability among any of the public bodies that provide children's services when a child fails to receive needed support services. The bill would place the responsibility for the provision of services squarely with the Agency/Department.

### **Supporting Argument**

One of the major complaints heard from children's advocates is that the system of service delivery to children is a reactive one, with little or no emphasis put on primary prevention needs and early intervention, before a problem becomes a crisis. The bill would place specific emphasis on early intervention and primary prevention and even would require that a percentage of the annual budget be dedicated for such efforts.

### **Supporting Argument**

The bill stresses a family-based approach to the provision of services. The legislative declarations of the bill's purpose include assisting children and families "to develop the capacity to control their own futures" and strengthening and encouraging "families and family life" in Michigan. The bill also would require that, when it was consistent with the child's and the community's best interests, services be provided within the context of the family.

### **Supporting Argument**

The bill's approach of first coordinating services within an autonomous Agency, then implementing pilot projects for the local delivery of the integrated services before creating a new Department, is well-advised. The pilot project approach would provide an opportunity for evaluating the bill's funding formulas and State-local partnership design before expanding the program statewide after October 1, 1995.

### **Opposing Argument**

Although the bill's initial phase (the elevation of the OCYS to an autonomous agency) and its interim phase (the implementation and operation of a limited number of pilot projects) could result in only negligible cost increases to

the State, creating a State Department of Children and Family Services could require the State to spend additional (and potentially large) amounts on the provision and administration of children's services in the future. Since the bill would require that the provision of services be based on a child's or family's need for services and not on financial or categorical eligibility, the total population of service recipients would be likely to increase and the largest proportion of that increase would consist of children and families who were not categorically eligible for Federal funding. (Categorical eligibility generally refers to those service recipients who are eligible for Federal grant programs, such as Aid to Families with Dependent Children (AFDC). The State receives about a 54% funding match for services provided to individuals who are categorically eligible.) In addition, the Headlee Amendment guarantees that counties would not be responsible for the financial burden of increased State-mandated services.

While the bill's indication of a change in philosophy pertaining to eligibility for children's services may be admirable for its equitable motive, its fiscal impact could be substantial. If the pool of service recipients expanded while the number of recipients eligible for Federal funding remained constant, or increased at a slower rate, and if the counties were held harmless for cost increases, then the State would be left to absorb the entire amount of any cost increases related to the provision of services to children and families in need.

**Response:** Rather than relying on the fragmented delivery system currently in place, under the bill all of the services now provided by the DSS, DMH, and juvenile court would be administered and provided under the umbrella of a single State department. Therefore, possible increase in State costs, if any, due to an expanded pool of service recipients could be at least partially offset by the benefits expected from increased efficiency in the administration of coordinated children's services. In addition, if the bill resulted in more children and their families receiving needed services, additional State funds would be well spent.

### **Opposing Argument**

Although it may be appropriate to consolidate the children's services offered by the DSS and its contractors, combining mental health and



judicial-based functions under a single department could be detrimental. Mental health services offered by community mental health boards are established and specialized and could be overshadowed by being combined with other services, typically related to family dysfunction or abuse and neglect. Probate court judges have a tight control and exercise proper oversight over juvenile justice services offered by courts. That system has worked well and shouldn't be disrupted because of problems with the DSS' children's service programs.

**Response:** In the bill's agency phase, mental health services would not be transferred, but would have to be coordinated with Agency-provided services in pilot project counties. Also, the bill distinguishes between "juvenile justice services" and "juvenile justice judicial functions", which would include disposition of cases, probation, and preliminary hearings among other court activities. Juvenile justice judicial functions, of course, would remain with the courts. In addition, the bill specifies certain juvenile justice services that could continue to be provided by a court, during the Agency phase, if that court provided those services on the bill's effective date. Further, the bill would allow the Agency to assume the administration and operation of a court-run detention facility only if an agreement to do so were reached with the county board of commissioner and the presiding judge of the probate court. Finally, although mental health and juvenile justice services would be transferred to the Department, they could continue to be provided by community mental health boards and probate courts through contracts with the Department.

#### **Opposing Argument**

The bill would disrupt the delivery of existing services. Reorganizing the structure of varied children's services programs offered by several providers could lead to the incomplete and inefficient delivery of those services. Further, such a turn of events could undermine established relationships of service providers with their clients.

**Response:** While some short-term disruption could occur in integrating children's service programs under one public entity, the long-term benefits of coordinating those services would outweigh the possible inconvenience.

#### **Opposing Argument**

The bill simply would add to an already overburdened State bureaucracy. Creating a new department, joint committee, task force, cabinet council, and various local boards would add to the maze of children's services and result in at least as much confusion and lack of coordination and accountability as now exists.

**Response:** The bill would streamline an unruly and uncoordinated bureaucracy. Although the bill would create various new panels to oversee the delivery of children's services, those bodies would be guided by the same goals and mandates. They would function as parts of a single unit, with a common point of entry to the system, a coordinated information-gathering network, and an integrated service delivery process.

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