

Director Steven N. Sudduth Consultant Carol S. Sudduth Date:

Three Woodland Camps for Girls Founded 1902 Assistant Directors Susan Sudduth Hammond David B. Sudduth

e: March 5, 2024

To: Members of the Joint Standing Committee on Health and Human Services

From: Steven Sudduth - Wyonegonic Camps

RE: LD 2230 An Act to Change Department of Health and Human Services Rules Regarding Youth Camps to Major Substantive Rules

My name is Steven Sudduth. I am Director of Wyonegonic Camps located in Denmark, Maine. Wyonegonic is a family owned and operated private residential camp for girls. We look forward to our upcoming 122nd summer of operation.

I am here today in support of LD 2230. While I realize a bill asking the legislature to change the Chapter 208 licensing rules from routine technical to major substantive is significant, however I feel that this effort may prove to be what is necessary to have DHHS withdraw the current rulemaking draft and conduct stakeholder meetings with youth camp representatives (MYCA) in a collaborative manner.

For reasons still unclear, the HIP program will not agree to the historic collaborative approach which has occurred for the better part of the last 50 years. For reasons unclear, DHHS has yet to respond to responses provided by MYCA regarding four specific questions submitted by DHHS to MYCA in January 2020. For reasons unclear, Maine camps have been forced to public hearing only type communication rather than the process we have experienced for decades; all while the recent rule change proposals place an increase of 40% critical violations from #140 current to #224. There are important topics such as background checks, employment eligibility, clarification on reporting requirements regarding abuse and neglect, driver records, health center supervision, plus a new section called Farm camp that all need discussion. All are important topics and MYCA seeks the best ways to provide physical and emotional safe camp programs.

Collaborative partnering has led to inspector training designed to assist HIP inspectors regarding program areas specific to the Chapter 208 rules. Past efforts have led to embedding 12 aligned codes that are referred to within the Chapter 208 rules. Collaborative partnering has led to alternatives to the DHHS self imposed challenge of annual inspection by coordinating a waiver process in order to focus on programs needing the most attention. Most importantly, past stakeholder sessions have led to strong and effective rules which are also the most duplicated regulations in other states within the summer camp industry.

Thank you for your time and consideration to shift to major substantive rules. We simply want to be involved with the rulemaking process to ensure rules are effective, logical and achievable

Sincerely. Kuepannent

Steven Sudduth

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