Original: 2186

THE COUNTY OF CHESTER

COMMISSIONERS:
Colin A. Hanna, Chairman
Karen L. Martynick
Andrew E. Dinniman

KIM P. BOWMAN, M.S.
Executive Director

DEPARTMENT OF DRUG AND ALCOHOL SERVICES
Government Services Center, Suite 325
601 Westtown Road
P.O. Box 2747
West Chester, PA 19380-0990
ADMINISTRATION:
Phone: 610-344-6620 Fax: 610-344-5743
CASE MANAGEMENT:
Phone: 610-344-5630 Fax: 610-344-5436

May 11, 2001

Mr. John Hair
Department of Health
Bureau of Community Program Licensure and Certification
132 Kline Plaza, Suite A
Harrisburg, PA 17104

Dear John:

I am writing to oppose the proposed deletion of existing prevention regulations and their oversight by the PA Department of Health, Division of Drug and Alcohol Licensure as published in the PA Bulletin, Doc. No. 01-679. I agree that the current regulations are not relevant to current drug and alcohol prevention practice in Pennsylvania. However, to delete these regulations without an alternative that has had stakeholder input in the final product is premature. If the regulations are deleted at this time, we place drug and alcohol prevention services and the significant public dollars used to fund them at great risk.

A large amount of public funding supports drug and alcohol prevention services throughout the state. Therefore, it is essential that we insure a baseline standard is met. These services touch on most segments of our communities. By eliminating standards, without any alternative to replace them, we devalue prevention and the need for these services.

There should be no elimination of the current prevention regulations until an alternative, which has been commented on by affected parties, has been definitively established. There has been a great deal of work done on an alternative by many stakeholders. However, there has yet to be a finished product distributed that has had any, much less adequate time for comment from affected parties.

Finally, adequate financial resources for implementation must accompany whatever alternative is established. The transfer of this responsibility from licensing to another entity results in a shift in costs that must be addressed. The Fiscal Impact note of the Proposed Rulemaking states that there would be "no measurable fiscal impact on the Commonwealth, local government, the private sector, or the general public". The Cost and Paperwork Estimate states "There will be neither additional costs nor additional paperwork to the Commonwealth, local governments or the private sector resulting from the deletion of these regulations". I strongly disagree with these statements.

Whatever alternative is established will require oversight which is a new responsibility for someone. If this occurs via SCA contracts, it will require new staff at the County level. If it occurs via an independent certification body, it will require funding to the selected body from the state, and a new fee from prevention providers, or both. As many prevention organizations are grass-root, non-profits, the need to pay this fee may also have the unintended effect of eliminating effective resources. If no alternative is established, then large amounts of taxpayer funds are put at risk for ineffective use.

Thank you for your consideration of our comments regarding this important issue.

Sincerely,

Kim P. Bowman

KPB/st

S:\Admin\kim\prevention recission comments.doc

Original: 2186

PACDAA

Pennsylvania Association of County Drug & Alcohol Administrators, Inc.
17 North Front Street Harrisburg, PA 17101 (717) 232-7554

May 15, 2001

John Hair
Department of Health
Bureau of Community Program Licensure and Certification
132 Kline Plaza, Suite A
Harrisburg, PA 17104

Dear John,

I am writing on behalf of the Pennsylvania Association of County Drug and Alcohol Administrators (PACDAA) to **oppose the deletion of existing prevention regulations and their oversight by the PA Department of Health, Division of Drug and Alcohol Licensure** as published in the PA Bulletin, Doc. No. 01-679. While we agree that the existing regulations do not reflect current drug and alcohol prevention practice in Pennsylvania, we believe the recission is being done prematurely. As a result drug and alcohol prevention services, and the significant public dollars used to fund, will be at great risk.

A large amount of state, federal, and local public funding supports drug and alcohol prevention services throughout the state. These services touch on most segments of our communities. Therefore **it is essential that we insure a baseline standard** is met. By eliminating standards, without any alternative to replace them, it appears that we are devaluing prevention and the need for these services.

There has been a great deal of work done on an alternative by many stakeholders. However, there has yet to be a finished product distributed that has had any, much less adequate, time for comment from affected parties. **There should be no elimination of the current prevention regulations until an alternative, which has been commented on by affected parties, has been definitively established.**

Finally, **adequate financial resources for implementation must accompany whatever alternative is established.** The transfer of this responsibility from licensing to another entity results in a shift in costs that must be addressed. The Fiscal Impact note of the Proposed Rulemaking states that there would be "no measurable fiscal impact on the Commonwealth, local government, the private sector, or the general public. We strongly disagree with this statement.

Whatever alternative is established will require oversight. If this occurs via SCA contracts, it will require new staff at the County level. If it occurs via an independent certification body it will require funding to the selected body from the state, a new fee from prevention providers, or both. As many prevention organizations are grass-root, non-profits the need to pay this fee may also have the unintended effect of eliminating effective resources. If no alternative is established then large amounts of taxpayer funds are put at risk for ineffective use.

Thank you for your consideration of our comments regarding this important issue.

Sincerely,

Kim P. Bowman

Kim P. Bowman,
Chairperson

Kathy Hubert

Kathy Hubert,
Executive Director

Original: 2186

LACKAWANNA COUNTY COMMISSION
ON DRUG AND ALCOHOL ABUSE
Phone (570) 963-6820
Fax (570) 963-6617

JOSEPH CORCORAN
RANDY CASTELLANI
ROBERT CORDARO
COMMISSIONERS
ANN MARIE SANTARSIERO
EXECUTIVE DIRECTOR

FAX TRANSMISSION

FAX: 717/787-3188

TO: Cheryl Williams, Director

AGENCY/COMPANY: Division of D&A Program Licensure

A total of 2 pages, including this face sheet, accompanies this transmission.

SENT BY: Ann Marie Santarsiero
Date: 5-21-01

RE: Recision of Prevention Licensing

LACKAWANNA COUNTY COMMISSION
ON DRUG AND ALCOHOL ABUSE
Phone (570) 963-6820
Fax (570) 963-6617

JOSEPH CORCORAN
RANDY CASTELLANI
ROBERT CORDARO
COMMISSIONERS
ANN MARIE SANTARSIERO
EXECUTIVE DIRECTOR

MEMO

DATE: May 21, 2001

TO: John C. Hair, Director
Bureau of Community Program
Licensure and Certification
Pa. Department of Health

FROM: Ann Marie Santarsiero, Exec. Director
Lachine SCA

RE: Recision of Prevention Licensing

The Northeast Regional SCAs (Bradford, Carbon/Monroe/Pike, Lackawanna, Luzerne/Wyoming, Schuylkill, Susquehanna and Wayne) strongly oppose the proposed recision of licensure/certification of prevention programs by the PA Dept. of Health, Division of Drug and Alcohol Program Licensure.

Until such time as an alternative process is in place which will preserve the integrity and professionalism of the prevention field, the Division should continue its current responsibilities.

AMS:mmw
c.c Cheryl Williams, Director
Division of D&A Program Licensure
Kathy Hubert, Exec. Director
PACDAA

Original: 2186

CADA

Council on Alcohol and Drug Abuse

126 N. Ninth Street
Allentown, PA 18102
(610) 437-0801
Fax: (610) 437-1997

May 1, 2001

John C. Hair, Director
Bureau of Community Program Licensure
and Certification
132 Kline Plaza, Suite A
Harrisburg, PA 17104

Dear Mr. Hair:

This letter is in response to correspondence dated April 23, 2001, regarding the proposal to rescind the regulations relating to prevention activities. You may be aware that I represented the Pennsylvania Community Providers' Association on the work group to revise the prevention standards. This work group met over a period of two years to develop standards consistent with the field of prevention today.

My objection to the process to rescind the current standards is that there is no alternate approval process proposed to take it's place upon the time of rescission, leaving prevention activities an unregulated activity in Pennsylvania. It has long been a concern of many in the prevention delivery system that the current process will be abolished with no provision for a new and improved process.

The Council on Alcohol and Drug Abuse has held a Prevention Approval Certificate for many years and supports a process for continued approval consistent with the current nature of substance abuse prevention services. While the rescission of the current process is necessary, to do so with no alternate process in place presents a window of opportunity for anyone to claim they deliver such services and possibly do harm to the field of substance abuse prevention.

I would be happy to further discuss my concerns with you or answer any questions related to my stated objection. Please do not hesitate to contact me at your convenience.

Sincerely,

Lori A. Weiss

Lori A. Weiss
Executive Director

United Way