

# 2654

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Janice Staloski, Director  
Bureau of Community Program Licensure  
and Certification  
Department of Health  
132 Kline Plaza, Suite A  
Harrisburg, PA 17104

INDEPENDENT REGULATORY  
REVIEW COMMISSION

RE: Regulation No. 10-186

Dear Ms. Staloski,

The Department of Health is proposing changes to the state confidentiality protections of drug and alcohol addiction treatment records. (Regulation No. 10-186) We believe these changes will weaken the current confidentiality protections and allow release of personal information beyond diagnosis to payers and many others.

This regulation is opposed by the Department of Health's own Pennsylvania Advisory Council on Drug and Alcohol Abuse (three votes of opposition), the Pennsylvania Association of County Drug and Alcohol Administrators, the Pennsylvania Recovery Organizations-Alliance, the Drug and Alcohol Service Providers Organization of Pennsylvania. In addition, the Independent Regulatory Review Commission has received over 160 letters of opposition from members of the House and Senate, treatment programs, people in recovery, county administrators and many others.

Despite all of this opposition, the Department has moved forward with a new version that fails to address any of the concerns raised.

The state confidentiality regulations currently in place work well and we believe strike the right balance between protecting personal privacy while simultaneously providing sufficient information to payers. The current state confidentiality protections should be maintained with no changes.

We the co-signers urge immediate withdrawal of this proposed regulation.

Cc: Independent Regulatory Review Commission

We the undersigned respectfully request that the Department of Health Regulation No. 10-186 be withdrawn.

	District #		District #
<u>Gene Redhofan</u>	<u>18</u>	<u>Marguerite Zini</u>	<u>143</u>
<u>Ann Heller</u>	<u>168</u>	<u>[Signature]</u>	<u>124</u>
<u>Matthew E. Baker</u>	<u>68</u>	<u>Stuart [Signature]</u>	<u>83</u>
<u>Katherine Watson</u>	<u>144</u>	<u>Duane Milne</u>	<u>167</u>
<u>Ann M. O'Brien</u>	<u>169</u>	<u>Rn Raymond</u>	<u>162</u>
<u>BOB [Signature]</u>	<u>29<sup>th</sup></u>	<u>[Signature]</u>	<u>108</u>
<u>Paul Chymer</u>	<u>145<sup>th</sup></u>	<u>Tom Farrell</u>	<u>85</u>
<u>Chris Ross</u>	<u>158<sup>th</sup></u>	<u>[Signature]</u>	<u>78</u>
<u>[Signature]</u>	<u>31<sup>st</sup></u>	<u>Bob Mersch</u>	<u>147</u>
<u>[Signature]</u>	<u>128</u>	<u>Thomas P. Vant</u>	<u>152</u>
<u>Scott Pitt</u>	<u>178<sup>TH</sup></u>	<u>Jane [Signature]</u>	<u>26</u>

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	District #		District #
<u>Steve A. J.</u>	<u>126</u>	<u>Thomas A. Callaghan</u>	<u>127</u>
<u>Thomas C. Belmont</u>	<u>27</u>	<u>Don Walker</u>	<u>20</u>
<u>Rich Walker</u>	<u>45</u>	<u>[Signature]</u>	<u>166</u>
<u>M.J. [Signature]</u>	<u>35</u>	<u>John E. Pallone</u>	<u>84</u>
<u>Joseph [Signature]</u>	<u>55</u>	<u>Lisa Best</u>	<u>21</u>
<u>[Signature]</u>	<u>42</u>	<u>Joseph De Luca</u>	<u>32</u>
<u>Joe MacLennan</u>	<u>25</u>	<u>[Signature]</u>	<u>73</u> <del>100</del>
<u>Mark Lopez</u>	<u>7</u>	<u>[Signature]</u>	<u>58</u>
<u>Mike Hanna</u>	<u>76<sup>th</sup></u>	<u>[Signature]</u>	<u>16</u>
<u>Scott [Signature]</u>	<u>77</u>	<u>[Signature]</u>	<u>185</u>
<u>Joseph [Signature]</u>	<u>24<sup>th</sup></u>	<u>[Signature]</u>	<u>11<sup>th</sup></u>

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	District #		District #
<u>William K. Adolph</u>	<u>165</u>	<u>[Signature]</u>	<u>170</u>
<u>Scott W. [Signature]</u>	<u>43</u>	<u>[Signature]</u>	<u>99</u>
<u>Anton [Signature]</u>	<u>99</u>	<u>Todd [Signature]</u>	<u>90</u>
<u>Kathy J. Rapp</u>	<u>65</u>	<u>[Signature]</u>	<u>4</u>
<u>David R. Millard</u>	<u>109</u>	<u>Julie [Signature]</u>	<u>183</u>
<u>William [Signature]</u>	<u>08</u>	<u>John D. Payne</u>	<u>106</u>
<u>[Signature]</u>	<u>62</u>	<u>[Signature]</u>	<u>139</u>
<u>[Signature]</u>	<u>30</u>	<u>Mario [Signature]</u>	<u>176</u>
<u>Sandra [Signature]</u>	<u>111</u>	<u>Jel J. [Signature]</u>	<u>197</u>
<u>Jim [Signature]</u>	<u>14</u>	<u>William S. [Signature]</u>	<u>131</u>
<u>Mark [Signature]</u>	<u>44</u>	<u>Jane [Signature]</u>	<u>59</u>
<u>[Signature]</u>	<u>7077</u>		

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	District #		District #
<u>W. Curtis Thomas</u>	<u>181</u>	<u>Frank Oliver</u>	<u>195</u>
<u>Leona Williams</u>	<u>192</u>	<u>John J. Galle</u>	<u>140</u>
<u>W. G. Galt</u>	<u>198</u>	<u>Thomas St. Blackwell, IV</u>	<u>190</u>
<u>Paul R. Galt</u>	<u>34</u>	<u>Richard J. Galt</u>	<u>182</u>
<u>Steve Renshaw</u>	<u>36</u>	<u>Janet A. Galt</u>	<u>10</u>
<u>Frank Galt</u>	<u>48</u>	<u>Wall Galt</u>	<u>123</u>
<u>Dorothy Kulla</u>	<u>52</u>	<u>Scott Galt</u>	<u>77</u>
<u>Shelley Galt</u>	<u>159</u>	<u>Joan Galt</u>	<u>133</u>
<u>John Galt</u>	<u>3</u>	<u>Emily P. Galt</u>	<u>71</u>
<u>Rich Galt</u>	<u>137</u>	<u>Frank Galt</u>	<u>157</u>
<u>Ronald G. Galt</u>	<u>191</u>	<u>Eddie Galt</u>	<u>121</u>

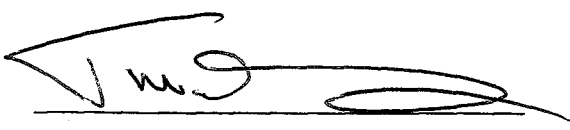
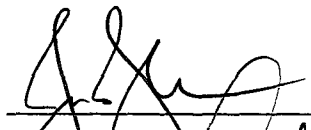

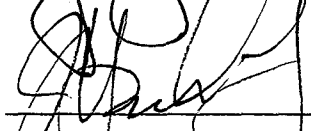
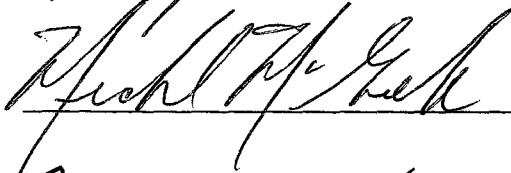
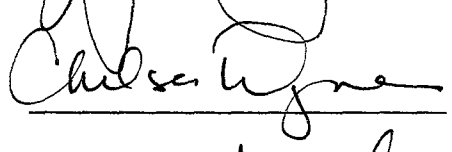
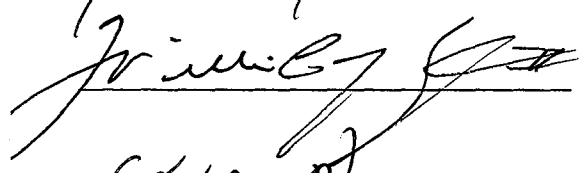
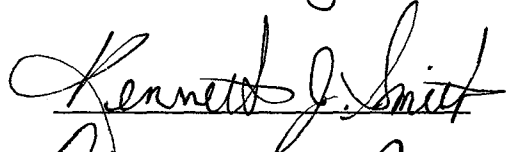

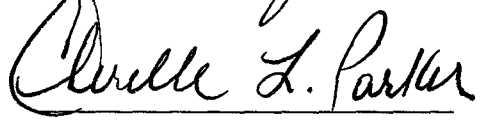

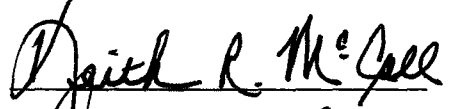
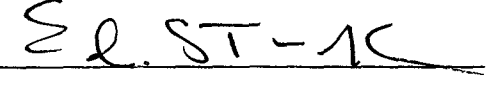

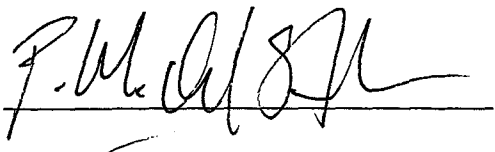

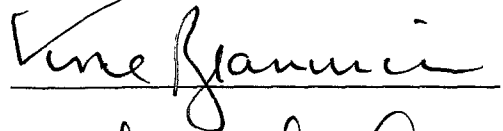
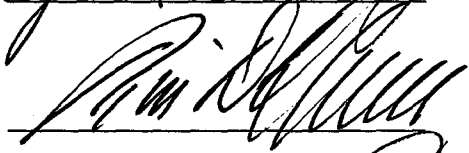
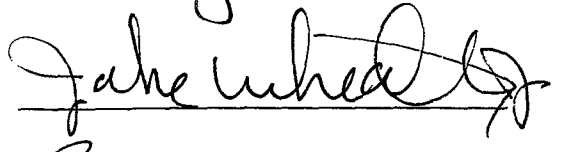
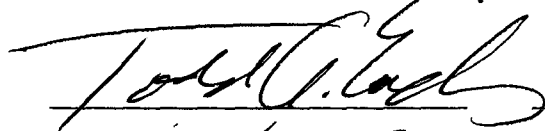
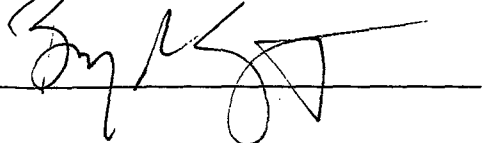

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	District #		District #
<u>Mike Flah</u>	<u>81</u>	<u>Katie True</u>	<u>41</u>
<u>Beverly Mackereth</u>	<u>196</u>	<u>Jurymantz</u>	<u>88</u>
<u>Carole Rubley</u>	<u>157</u>	<u>Marcia Lippitt</u>	<u>101</u>
<u>Ron Miller</u>	<u>93</u>	<u>John Ry...</u>	<u>60</u>
<u>H-R-N-M</u>	<u>193</u>	<u>Aden W...</u>	<u>82</u>
<u>Fred M. White</u>	<u>63</u>	<u>Joseph M...</u>	<u>12</u>
<u>Mario J. Girard</u>	<u>164</u>	<u>Bob Kuffman</u>	<u>89</u>
<u>John M. Peryel</u>	<u>172</u>	<u>Jana Pritchett</u>	<u>110</u>
<u>Robert W. East</u>	<u>79</u>	<u>Frank M...</u>	<u>105</u>
<u>Joseph Stern</u>	<u>80<sup>th</sup></u>	<u>Steph E. Benas</u>	<u>160</u>
<u>Samuel A. Smith</u>	<u>66</u>	<u>Curt Schroder</u>	<u>155</u>

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	District #		Dis
<u>Andy D. Glan</u>	<u>141</u>	<u>Kevin J. Mc</u>	<u>1</u>
<u>Nick K. Klemm</u>	<u>39</u>	<u>Eugene P. Pagan</u>	<u>95</u>
<u>Steve Samuelson</u>	<u>135</u>	<u>Mark B. Colan</u>	<u>7</u>
<u>Sam Walker</u>	<u>20</u>	<u>Barbara B.</u>	<u>156</u>
<u>Thomas R. Langston</u>	<u>57</u>	<u>Jim Giff</u>	<u>12</u>
<u>W.D. Wankel</u>	<u>23</u>	<u>John G. Giff</u>	<u>5</u>
<u>DR</u>	<u>188</u>	<u>Phyllis Mundy</u>	<u>120</u>
<u>Capello George</u>	<u>74</u>	<u>Don A. Sa</u>	<u>75</u>
<u>Malcolm H. O'Brien</u>	<u>175<sup>B</sup></u>	<u>Ed K.</u>	<u>140</u>
<u>Robert Free</u>	<u>136</u>	<u>Frank R. K.</u>	<u>113</u>
<u>John Myers</u>	<u>201</u>	<u>Lawrence Curry</u>	<u>154</u>

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	District #		District #
	<u>51</u>		<u>46</u>
	<u>72</u>		<u>119</u>
	<u>173</u>		<u>22</u>
	<u>38</u>		<u>112</u>
	<u>130</u>		<u>200</u>
	<u>189</u>		<u>122</u>
	<u>115</u>		<u>180</u>
	<u>96</u>		<u>174</u>
	<u>15</u>		<u>51</u>
	<u>19</u>		<u>11</u>
	<u>161</u>		<u>118</u>



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	District #		District #
<u>Cyril W. Math</u>	<u>187<sup>th</sup></u>	<u>R. M. Swanger</u>	<u>H-102</u>
<u>Pauline</u>	<u>84<sup>TH</sup></u>	<u>Thomas J. Zingley</u>	<u>146</u>
<u>Marta Claus</u>	<u>67</u>	<u>Peter W. Gold</u>	<u>53<sup>rd</sup></u>
<u>Jack</u>	<u>5</u>	<u>John Hay</u>	<u>61<sup>st</sup></u>
<u>Mike Turzpi</u>	<u>162</u>		
<u>Craig D. G.</u>	<u>138</u>		
<u>Stan Taylor</u>	<u>94</u>		
<u>Geoff Guleser</u>	<u>47</u>		
<u>Brad Rose</u>	<u>6</u>		
<u>Bob Bach</u>	<u>69</u>		
<u>Arthur D. Hershey</u>	<u>13<sup>th</sup></u>		

