

Bowling Green Brandywine

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INDEPENDENT REGULATORY
REVIEW COMMISSION

2008 JAN 11 AM 9:05

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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

January 7, 2008

Dear Ms. Staloski,

Thank you for the opportunity to provide feedback on the proposed changes to the PA Drug and Alcohol confidentiality regulations.

These proposed changes will create much more of a problem than they will "relieve" a burden. Those entities that are advocating for these changes (i.e. third party payers, governmental agencies), and the providers giving care will undoubtedly find themselves in conflict over what is "information necessary to accomplish the specific purpose for the disclosure." The newly proposed verbiage is much too loose leaving the possibility of patient information being disclosed that may be embarrassing. There is no verbiage indicating what information should be withheld – again leaving patient information unnecessarily vulnerable to entities who are not treating the patient and should not be privy to such information.

The administrative burden that the above will cause to providers is frightening. The amount of time that providers spend on the phone now trying to "convince" managed care entities that their consumers need treatment is a travesty as it stands. With the above proposed changes, this will just give managed care entities more fuel to ask more questions about patients sensitive information and take up more time "deciding" whether their consumers really need treatment. This clearly, will be a deterrent to providers wanting to treat patients with managed care insurance and the amount of denials will certainly be a deterrent for patient seeking help.

The above is just a small argument as to the detriment these changes will cause in the Pennsylvania Drug and Alcohol field and I am strongly objecting to the Department of Health's Proposed Regulation No. 10-186.

Sincerely:

A handwritten signature in cursive script, appearing to read "L Olander".

Lisa M. Olander, MEd, LPC, CAC, CCJP, CCBT
Executive Director
Bowling Green, Brandywine

CC: Independent Regulatory Review Commission
Representative Frank Oliver
Senator Edwin Erickson
Representative George Kenney
Senator Vincent Hughes