

GAUDENZIA, Inc.

EASTERN REGION OFFICE  
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Robert P. Kelly  
Chairman of the Board

Michael Harle, M.H.S.  
President/Executive Director

A United Way Donor Option Agency

Jan. 11, 2008

2654

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

2008 JAN 14 AM 10:02

RECEIVED

Dear Ms. Staloski;

I would like to submit my comments on the proposed changes in the regulations regarding the confidentiality of drug and alcohol treatment information. The proposed changes are not in the best interest of our clients and should not be adopted. There is much danger that these changes will expose in-depth client information to people that it should not be given to, specifically those other than the people who are treating the clients.

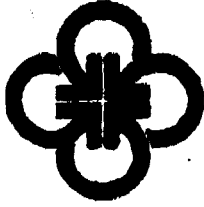
Last year in March, when it was proposed to rescind Pa. Code 255.5 altogether, I also objected. I have attached that letter because the reasons I opposed that proposal are the same as why I oppose the current proposed changes. Also, the proposed regulations do not adequately justify the release of additional information on clients. I do not see how the additional invasion of privacy is going to be beneficial to clients.

Clients are less likely to seek treatment if there a risk that their private data is going to be viewed by people other than those who are trying to help them. We must remember that is the reason 255.5 was established in the first place – so that insurance companies and other entities would not be receiving more information than they need.

Thank you for the opportunity to offer my comments.

Sincerely,

Michael D. Link  
Eastern Region Director



**GAUDENZIA, Inc.**

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Robert F. Kelly  
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March 23, 2007

Division of Drug and Alcohol Program Licensure  
Attn: Cheryl Williams  
PA Department of Health  
132 Kline Plaza, Suite A  
Harrisburg, PA 17104

Dear Ms. Williams:

This correspondence is to provide you with feedback concerning the proposed regulations which would rescind regulations that protect the confidentiality and privacy of clients receiving alcohol and other drug treatment.

I support confidentiality and the privacy of information regarding clients receiving alcohol and other drug treatment services. Any recession of these rights could possibly open the door for managed care insurance companies to violate these rights which would be detrimental to our clients.

Additionally, this possible recession go against the government's recent approach to provide more patient/client protection for services via HIPPA. Prior to joining Gaudenzia, I was the Chief of Treatment for the Ohio Department of Alcohol and Drug Addiction Services (ODADAS) and worked very closely with the provider community throughout the state. I can assure you that the AoD provider community would be up in arms over any possible recession to client confidentiality and privacy rights. As the eastern regional director for Gaudenzia, I have responsibility for our Philadelphia programs and I come into contact with clients every day. I know our clients and they are not supportive of these proposed regulations.

Thank you for allowing me to provide you feedback on this very important matter.

Sincerely,

Michael D. Link, Eastern Region Director  
Gaudenzia, Inc.