

GAUDENZIA, INC.
Central Region Office

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Robert P. Kelly
Chairman of the Board

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

1910 North Second Street, Harrisburg, PA 17102
Jan. 11, 2008

(717) 238-4200 • Fax (717) 238-9206

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

Dear Ms. Staloski;

As the Central Region Director of Gaudenzia, I must strongly urge that we do not adopt the proposed changes to the confidentiality regulations regarding drug and alcohol records. We know that stigmatism is a prominent factor in preventing people from seeking treatment when they need it, and I cannot imagine why we would want to increase the amount of data available to entities outside of the treatment agency.

To say that this additional data would benefit clients is not backed up by an explanation of how it would. Clients will have more of their personal information at risk for being seen by people who simply don't need to see it – or worse – may use it to deny them treatment.

I am in charge of several treatment programs in Central Pennsylvania, and from my perspective, the proposed regulations are not logical and will not produce greater access to treatment.

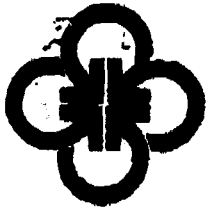
I had the same reaction to last year's proposal to rescind 255.5, and I am attaching that letter because it explains my reasons why we should not loosen the restrictions on client confidentiality.

Thank you.

Sincerely,

David Stockton
Central Region Director

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INDEPENDENT REGULATORY
REVIEW COMMISSION



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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

Re: Comments 4 PA Code Section 255.5 (b)

Dear Ms. Williams,

I am writing to oppose the rescinding of the existing regulations and I am curious and concerned as to why the changes are being proposed. As an individual with over 35 years in the addiction treatment and prevention field with experience in direct service, program management and county administration, I must strongly recommend that the regulations not be rescinded.

The rescission will have a chilling effect on those contemplating entering treatment. This also would affect the therapeutic alliance between the clinician and the client so necessary to the positive outcome of treatment.

While the existing regulation requires proper documentation, training and thought on the part of clinician, provider and administrator, they are necessary and required not for the benefit of the insurance company but for the client.

Addiction is a highly stigmatized disease and that stigma spreads to family, loved ones and to the providers of service. The improper release of information that could take place with the rescission of these regulations would affect people's ability to gain employment, insurance benefits and healthcare treatment, etc. Please consider your actions thoughtfully.

As a Counselor, the existing regulations helped me do my job to engage, retain and successfully treat individuals and families. As a Program Manager, they gave structure and clarity to the need for us to maintain effective relations with others to coordinate care without doing harm. As a County Administrator, I could make responsible decisions regarding payment, reimbursement and system development while maintaining safety for individuals and their families.

I have served on numerous confidentiality work groups, task forces and committees. I do not see why we should be changing these regulations. It is ludicrous to believe that insurance companies and/or profit driven managed care firms would provide more or better care with the rescission of these regulations.

In conclusion, as one who is directly responsible for 19 treatment programs and the coordination of the care of addicts that are pregnant, those with children, those that have HIV, those that are employed, unemployed, or suffer from mental illness and serious trauma, I ask you to reject the rescission of these regulations.

Sincerely,

Dave W. Stockton

Dave Stockton, Central Region Director
Gaudenzia, Inc.