

HARBOR COUNSELING

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January 11, 2008

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 PM 1:53

RECEIVED

Dear Ms. Staloski -

On behalf of Harbor Counseling - a licensed addiction treatment facility - I am writing to express our objections to the changes pursued by Proposed Regulation No. 10-186 in the confidentiality protections currently afforded to drug and alcohol addiction treatment patient records and information.

We do not wish to reiterate the comprehensive and coherent argument developed by DASPOP - although we would like to express our full support for the position and defense presented in their January 4, 2008 correspondence.

As an addiction treatment provider with many years of service to the Tioga County community, our agency can attest to the importance for our clients the safety and security which the confidentiality protections of 4 PA Code §255.5(b) provide. Our clients have been protected even from well-intentioned clinical staff who, without the necessary restraints imposed by the confidentiality statutes, might have otherwise injudiciously shared information that could have been damaging to our clients in one way or another. One of the strongest and clearest messages of the existing regulations has been that the client - and protecting the client - needs to be a fundamental focus in the provision of treatment, especially since this serves to eliminate certain barriers to effective treatment.

Furthermore, for those of us who practice in rural communities such as Tioga County, where clinical options are more limited for our client population, there is an increased need for our community to feel particular safety, privacy and protection when seeking help for a highly sensitive and stigmatized problem at any particular agency. Any erosion in their privacy and confidentiality rights might make it even more difficult for our community members to seek help from any local resource.

We offer solutions for substance abuse problems.

Existing regulations are based on the understanding that there are already too many therapeutic barriers to addressing the pressing substance abuse and addiction problems in our communities, and that strong confidentiality regulations are a way of removing some of those barriers. It is difficult for us to support any erosion in the protections that our clients currently enjoy and need.

Thank you for the opportunity to comment on the proposed regulatory changes regarding confidentiality of drug and alcohol addiction treatment patient records and information.

Respectfully,



Douglas Candelario, MA, LPC
Director

FACSIMILE TRANSMITTAL SHEET

TO	FROM: Douglas Candelario
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 FOR REVIEW
 PLEASE COMMENT
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NOTES/COMMENTS:

Regarding Proposed Regulation #10-186

*2654
SRS*