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WHITE DEER RUN

Committed to Excellence

A Member of CRC Health Group

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January 10, 2008

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

Dear Director Staloski,

Thank you for the opportunity to review and comment on the Department of Health's Proposed Regulation No. 10-186 regarding confidentiality of drug and alcohol addiction treatment patient records and information.

As the Director of Quality and Nursing Services for White Deer Run, Inc I have frequent opportunity to be involved or consulted in matters of confidentiality relating to treatment and external requests for release of information. Without fail, the guidelines as provided under 4 PA Code §255.5 and the Federal confidentiality regulations (42 CFR, Chapter 1) assist us in responding in a manner that is courteous, fair, and consistent.

White Deer Run (WDR) is, by history and action, a strong supporter and advocate of 4 PA Code §255.5. Past and present leaders of WDR have developed a framework in which we work with external entities who request information while protecting patient's rights as afforded under existing laws. The work has not been easy in many circumstances. At times there have been threats of legal and financial backlash for upholding the laws that safeguard the people in our care.

Therefore, it is with great concern that I must voice my objection to the Department's Proposed Regulation No. 10-186 regarding confidentiality of drug and alcohol addiction treatment patient records and information. As a professional nurse with nearly thirty years experience in the direct treatment and administrative oversight of patients with mental illness and chemical dependency, I believe our

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patients have much to lose under the proposed changes. I believe that precious time and staff resources would be spent sorting out issues that were previously matters of routine business, performed exceedingly well, and unfailingly. Most importantly there is not, in my opinion, a measure of benefit on behalf of the patient in the proposed changes.

Thank you once again for the opportunity to review and comment on the proposed regulation.

Respectfully,

Roseann H. Mollica

Roseann H. Mollica BSN, RN, BC
Director, Quality & Nursing Services
White Deer Run, Inc

Cc: Joseph Procopio, Regional Vice President Northeast Region
Recovery Division, CRC Health Group and WDR Executive Director

DASPOP
3820 Club Drive
Harrisburg, PA 17110

Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17104

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Majority Chairman
Health and Human Services Committee
PA House of Representatives
Room 34 East Wing
Harrisburg, PA 17120

Representative George Kenney
Minority Chairman
Health and Human Services Committee
PA House of Representatives
Room 108 Ryan Office Building

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Senator Edwin Erickson
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Public Health & Welfare Committee
Pennsylvania Senate
Room 281 Main Capitol Building
Harrisburg, PA 17120

Senator Vincent Hughes
Minority Chairman
Public Health & Welfare Committee
Pennsylvania Senate
Room 543 Main Capitol Building
Harrisburg, PA 17120

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RE: Proposed regulation No. 10-186

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