

The Philadelphia Alliance

Representing Community Providers for People with Mental Health, ~~Mental Retardation~~ and Chemical Dependency Needs.

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January 18, 2008

INDEPENDENT REGULATORY
REVIEW COMMISSION

Ms. Janice Staloski, Director
Bureau of Community Program Licensure
and Certification, Dept. of Health
132 Kline Plaza, Suite A
Harrisburg, PA 17104-1579

Dear Ms. Staloski,

On January 14th I sent you a letter via email on behalf of The Philadelphia Alliance of specialized agencies regarding the proposed changes to 4 Pa. Code § 255.5. Further discussion among our members has revealed somewhat different perspectives and we would like to clarify the Alliance's previously stated position.

Specifically, regarding § 255(d)(4), we want to revise our previous statement. We understand that service providers are mandated reporters of child abuse; and neither the old regulations nor the proposed regulations regarding confidentiality would prevent our members from reporting child abuse.

The Philadelphia Alliance continues to explore the issues raised by the proposed changes in regulation. Dedicated, well-meaning people have different interpretations based on their perspective and experience. At this point in time we do not have a unified Alliance position on all of these issues. Everyone wants to protect the client and make sure they get the service they need. We recognize these issues are very important; and there is a delicate balance between protecting highly sensitive patient information and allowing disclosure of information for constructive purposes.

Thank you for being open to input.

Sincerely,



Tim Wilson
Executive Director

Cc: Ms. Cheryl Williams, Bureau of Community Program Licensure and Certification, DOH

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The Association for Independent Growth

The Salvation Army

United Cerebral Palsy of Philadelphia

Walker Memorial Training Center

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Wordsworth Academy