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INDEPENDENT REGULATORY
REVIEW COMMISSION

AMHA

ADDICTION MEDICINE AND HEALTH ADVOCATES, INC.

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DEPT. OF HEALTH

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DEP SEC FOR PA & HB

REFER TO

2/19/08
Stacy
@CJH
Dutton
Kopelman

February 15, 2008

Calvin B. Johnson, M.D.
Secretary
Pennsylvania Department of Health
8th Floor West Health and Welfare Building
P.O. Box 90
Harrisburg, PA 17108

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FEB 25 2008
BUREAU OF COMMUNITY PROGRAM
LICENSURE AND CERTIFICATION

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Dear Secretary Johnson:

I am writing to you to express my support of the proposed changes to the Confidentiality Regulation 255.5b.

Addiction Medicine And Health Advocates (AMHA) has been in business as a Licensed Narcotics Treatment Program for over 25 years and we have struggled each and every year with the problem associated with 255.5b. With these proposed changes, it will make it less difficult to secure approvals and authorization from managed care organizations. Additionally, these changes will make it much easier to share information with other health and human service systems that are crucial to the benefit of our patients. Furthermore, the patient's confidentiality rights will continue to be protected by federal regulations 42 CFR (which impose restrictions on both the disclosure and the use of information about individuals receiving drug and alcohol services), HIPAA, and other Pennsylvania state regulations. In fact, the federal regulations provide among the most stringent patient protections in the entire health care system.

Finally, my program will not be cited each and every year for violating the Confidentiality Regulations because of sharing needed and appropriate information with patient consent.

Thank you for all your efforts to make this needed change.

Yours truly,



Robert Holmes, MSW, LCSW, BCD, CAS
Executive Director