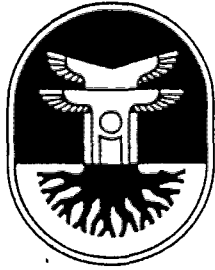


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# *Treatment Trends, Inc.*

18-22 S. SIXTH STREET P.O. BOX 685 ALLENTOWN, PA 18105

◆ *Confront* ◆ *Keenan House* ◆ *Halfway Home of Lehigh Valley*  
◆ *Richard S. Csandl Recovery House* ◆ *LC TCAP* ◆ *NC TCAP*

June 9, 2008

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

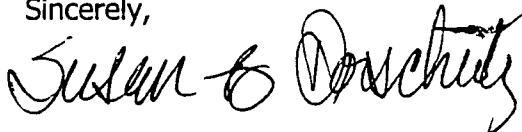
Dear Ms. Staloski,

Please accept for review my comments on the third set of proposed changes to the Department of Health's Proposed Regulation No. 10-186 regarding confidentiality of drug and alcohol addiction treatment patient records. These regulations should be withdrawn from the review process for the following reasons:

- It would keep fewer of those in addiction from seeking the treatment services they need for fear that treatment information will not remain confidential but be given to legal entities and insurers.
- The changes would require providers to give unnecessary personal information to insurance and third party payers. This undermines PA Placement Criteria.
- Information about vital signs, lab test results, motivation for treatment, behavioral information can and will be used by insurance companies to delay or deny treatment at a critical time of need.
- They exceed the federal standards under 42 CFR by allowing broad access to court ordered release of records without patient consent.
- The definitions are vague regarding "Government officials", which would permit wide access to confidential records through the open ended nature of the definition.
- These standards require a much larger amount of information than the current five points permitted under the current regulations. There will be a cost increase for the significant documentation and record maintenance for treatment providers under these new regulations.

Please withdraw the proposed changes to these vitally important regulations. The replacement of our current standards with those proposed will result in the loss of a critical protection to privacy rights for those persons suffering from this highly stigmatized disease and therefore, many who need it will not seek treatment. Thank you.

Sincerely,



Susan B. Dorschutz  
Executive Assistant

cc: Robert C. Csandl, TTI Executive Director  
Independent Regulatory Review Commission ✓  
Representative Frank Oliver  
Representative George Kenney  
Senator Edwin Erickson  
Senator Vincent Hughes