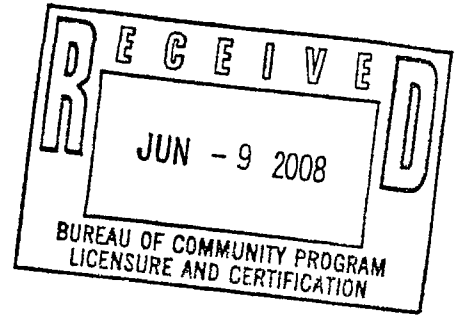




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June 4, 2008

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Staloski,

The purpose of this letter is to express **support of the proposed regulation amendment of the client confidentiality provisions** for clients who are receiving drug and alcohol services. Eagleview Hospital is an agency that provides treatment for drug and alcohol addiction and co-occurring disorders, whose mission is to work with patients and referring agencies to provide comprehensive, high quality services related to addiction, co-occurring disorders and other behavioral health problems.

Eagleview Hospital has advocated for change in § 255.5(b) for over a decade. The current regulations are outdated, unnecessary and impede the coordination of care. The § 255.5(b) regulations make it difficult to obtain appropriate approvals/authorizations from insurance companies and managed care organizations for higher levels of care, continued care, and appropriate medications.

The increase in and development of co-occurring treatment has made this problem even more apparent. In some cases clients cannot get authorization for needed medication due to the restrictions of § 255.5. Also, individuals in the drug and alcohol service system often need help navigating other systems and applying for much needed benefits. The problems with § 255.5(b) make it difficult to work with other important partners in the individual's recovery process such as the child welfare system, the Social Security Administration, and the criminal justice system.

Providers are put between a rock and a hard place – either share what needs to be shared (with the client's consent) to get needed services approved and risk citation by licensing or do not share the information and have services denied. Fortunately, most PCPA members have chosen to assure the client has services they need, yet fear citations for their actions.

Numerous task forces and work groups have met over the last 10 years to discuss the problems. We are hopeful that the long overdue changes are finally made to the confidentiality regulations in Pennsylvania in order to improve access to much needed drug and alcohol services.

Sincerely,

Lois K. Chepak
Patient Services Officer