



Family Services of Western Pennsylvania

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Ms. Staloski,

As a provider, I have been waiting for 10 years for a change in the Pennsylvania Drug and Alcohol confidentiality regulations. The current regulations are just primitive and assume the residents of this state are incapable of making decisions for themselves, that we are paid solely by grant funding streams that don't require information to make decisions around "medical necessity" and lastly that ignore the need for different parts of the human services system to be able to easily communicate and coordinate services.

The changes to the Drug and Alcohol Confidentiality regulations, while they don't solve all of the problems, make a very large step forward in bringing Drug and Alcohol confidentiality into the 21st century and stop treating the people we serve in a paternalistic anti-recovery manner. Currently we are not able to share information with a signed release of information form to assist the people we serve in obtaining disability benefits from social security. This is ridiculous. The ability to share relevant information with the court system that will assist the people we serve in their recovery is essential. Our being able to communicate someone's level of functioning as part of a managed care entity determination of someone's "medical necessity" in order to decide what level of care the person require is of critical importance.

While I wish the revisions would have gone further in determining how information can be shared between treatment providers, more consistent with the Federal HIPAA and Substance Abuse regulations, the changes that have been made to Pennsylvania's regulations are a real step forward. I hope the Department listens to this feedback and not to a well organized minority who tends to be opposed to any change, no matter how slight.

Sincerely yours,

Stephen Christian-Michaels
Chief Operating Officer



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FAX COVER SHEET

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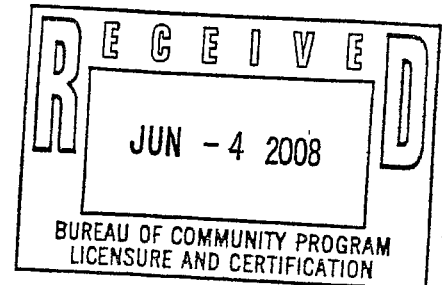
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June 3, 2008

**To Janice Staloski, Director
Bureau of Community Program
Licensure & Certification**

717-787-3188

From: Stephen Christian-Michaels



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