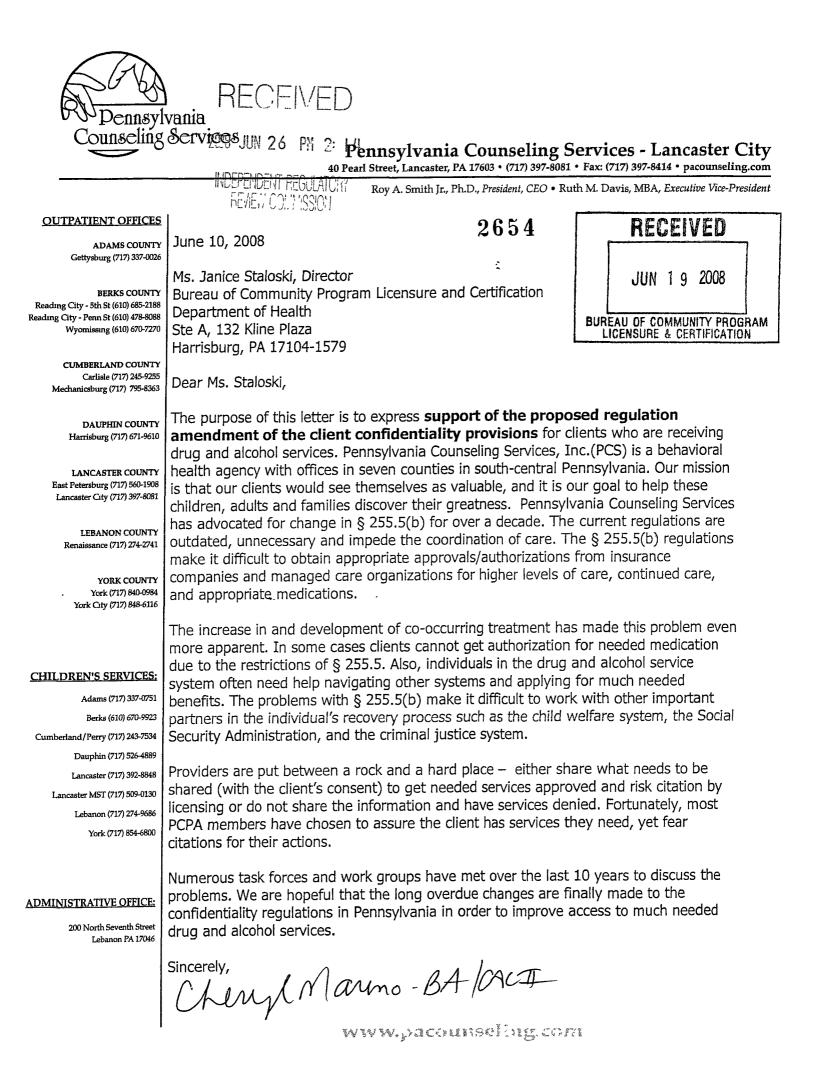


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		ith M. Davis, MBA, Executive Vice-President
OUTPATIENT OFFICES	AEVEV COVVISSION	
ADAMS COUNTY Gettysburg (717) 337-0020	June 10, 2008 2654	RECEIVED
	Ms. Janice Staloski, Director	
BERKS COUNTY	Bureau of Community Program Licensure and Certification	JUN 1 9 2008
Reading City - 5th St (610) 685-2186 Reading City - Penn St (610) 478-8086	Department of Health	
Wyomissing (610) 670-7270		BUREAU OF COMMUNITY PROGRAM
	Harrisburg, PA 17104-1579	LICENSURE & CERTIFICATION
CUMBERLAND COUNTY Carhsle (717) 245-9255 Mechanucsburg (717) 795-8363	Dear Ms. Staloski	
DAUPHIN COUNTY Harrisburg (717) 671-9610	The purpose of this letter is to express support of the propo amendment of the client confidentiality provisions for c drug and alcohol services. Pennsylvania Counseling Services, I	lients who are receiving
LANCASTER COUNTY East Petersburg (717) 560-1908 Lancaster City (717) 397-8081	health agency with offices in seven counties in south-central Pois that our clients would see themselves as valuable, and it is children, adults and families discover their greatness. Pennsylves	our goal to help these
LEBANON COUNTY Renaissance (717) 274-2741	has advocated for change in § 255.5(b) for over a decade. The outdated, unnecessary and impede the coordination of care. The make it difficult to obtain appropriate approvals/authorizations	he § 255.5(b) regulations
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	more apparent. In some cases clients cannot get authorization	
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	system often need help navigating other systems and applying	
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Cumberland/Perry (717) 243-7534	partners in the individual's recovery process such as the child w Security Administration, and the criminal justice system.	feirare system, the Social
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Lancaster (717) 392-8848	Providers are put between a rock and a hard place – either sha	are what needs to be
Lancaster MST (717) 509-0130	shared (with the client's consent) to get needed services appro-	
Lebanon (717) 274-9686	licensing or do not share the information and have services der	
York (717) 854-6800	PCPA members have chosen to assure the client has services the	iey need, yet fear
	citations for their actions.	
ADMINISTRATIVE OFFICE: 200 North Seventh Street Lebanon PA 17046	Numerous task forces and work groups have met over the last problems. We are hopeful that the long overdue changes are fit confidentiality regulations in Pennsylvania in order to improve a drug and alcohol services.	nally made to the
	Sincerely, Candice Aum, BMD	

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CUMBERLAND COUNTY Carhele (717) 245-9255 Mechanicsburg (717) 795-8363	Dear Ms. Staloski,	LICENSURE & CERTIFICATION
DAUPHIN COUNTY Harrisburg (717) 671-9610	The purpose of this letter is to express support of the pro amendment of the client confidentiality provisions for drug and alcohol services. Pennsylvania Counseling Services	or clients who are receiving
LANCASTER COUNTY East Petersburg (717) 560-1908 Lancaster City (717) 397-8081	health agency with offices in seven counties in south-centra is that our clients would see themselves as valuable, and it i children, adults and families discover their greatness. Penns	s our goal to help these sylvania Counseling Services
LEBANON COUNTY Renaissance (717) 274-2741	has advocated for change in § 255.5(b) for over a decade. To outdated, unnecessary and impede the coordination of care. make it difficult to obtain appropriate approvals/authorizatio	. The § 255.5(b) regulations ns from insurance
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	2013 UN 26 PM 2: 14 Pennsylvania Counseling Services - Lancaster City 40 Pearl Street, Lancaster, PA 17603 • (717) 397-8081 • Fax: (717) 397-8414 • pacounseling.com	
	INDEDE DENT RECULATORY Roy A Smith Jr., Ph.D., President, CEO • Ruth M Davis, MBA, Executive Vice-President Roy A Smith Jr., Ph.D., President, CEO • Ruth M Davis, MBA, Executive Vice-President Roy A Smith Jr., Ph.D., President, CEO • Ruth M Davis, MBA, Executive Vice-President	
OUTPATIENT OFFICES	2654 DECE	
Gettysburg (717) 337-0026	Ms. Janice Staloski, Director	
BERKS COUNTY Reading City - 5th St (610) 685-2188 Reading City - Penn St (610) 478-8088 Wyomissing (610) 670-7270	Bureau of Community Program Licensure and Certification JUN 1 7 2008	
CUMBERLAND COUNTY Carlisle (717) 245-9255 Mechanicsburg (717) 795-8363	Dear Ms. Staloski,	
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YORK COUNTY York (717) 840-0984 York Cıty (717) 848-6116	companies and managed care organizations for higher levels of care, continued care, and appropriate medications.	
<u>CHILDREN'S SERVICES:</u> Adams (717) 337-0751 Berks (610) 670-9923	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	
Cumberland / Perry (717) 243-7534 Dauphın (717) 526-4889	Security Administration, and the criminal justice system.	
Lancaster (717) 392-8848 Lancaster MST (717) 509-0130	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	
Lebanon (717) 274-9686 York (717) 854-6800	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	
ADMINISTRATIVE OFFICE: 200 North Seventh Street Lebanon PA 17046	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, Sincerely, MMMM, MH/AT	



2D3 JUN 26 PM 2: 14 Pennsylvania Counseling Services - Lancaster City 40 Pearl Street, Lancaster, PA 17603 • (717) 397-8081 • Fax: (717) 397-8414 • pacounseling.com

	INDEPENDENT PEGULATORY	Roy A. Smith Jr., Ph.D., President, CEO	Ruth M. Davis, MBA, Executive Vice-President
OUTPATIENT OFFICES		90F /	
ADAMS COUNTY Gettysburg (717) 337-0026	· · ·	2654	RECEIVED
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Carlisle (717) 245-9255 Mechanicsburg (717) 795-8363			
DAUPHIN COUNTY Harnsburg (717) 671-9610	amendment of the client of drug and alcohol services. Pe	o express support of the pro confidentiality provisions fo nnsylvania Counseling Services	or clients who are receiving s, Inc.(PCS) is a behavioral
LANCASTER COUNTY East Petersburg (717) 560-1908 Lancaster City (717) 397-8081	is that our clients would see t children, adults and families of	seven counties in south-centra hemselves as valuable, and it discover their greatness. Penn	is our goal to help these sylvania Counseling Services
LEBANON COUNTY Renaissance (717) 274-2741	outdated, unnecessary and in make it difficult to obtain app	§ 255.5(b) for over a decade. ⁻ npede the coordination of care ropriate approvals/authorizatic	. The § 255.5(b) regulations
YORK COUNTY York (717) 840-0984 York City (717) 848-6116	companies and managed care and appropriate medications.	e organizations for higher level	s of care, continued care,
<u>CHILDREN'S SERVICES;</u> Adams (717) 337-0751 Berks (610) 670-9923 Cumberland/Perry (717) 243-7534	more apparent. In some case due to the restrictions of § 25 system often need help navig benefits. The problems with §	nent of co-occurring treatment s clients cannot get authorizati 5.5. Also, individuals in the dru ating other systems and applyi 255.5(b) make it difficult to w covery process such as the chil he criminal justice system.	on for needed medication ug and alcohol service ing for much needed vork with other important
Dauphın (717) 526-4889 Lancaster (717) 392-8848 Lancaster MST (717) 509-0130 Lebanon (717) 274-9686 York (717) 854-6800	shared (with the client's conse licensing or do not share the i	ock and a hard place – either ent) to get needed services app nformation and have services o o assure the client has services	proved and risk citation by denied. Fortunately, most
ADMINISTRATIVE OFFICE: 200 North Seventh Street Lebanon PA 17046	problems. We are hopeful that	rk groups have met over the la t the long overdue changes are ennsylvania in order to improv	e finally made to the
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> CUMBERLAND COUNTY Carlisle (717) 245-9255 Mechanicsburg (717) 795-8363

> > DAUPHIN COUNTY Harrisburg (717) 671-9610

LANCASTER COUNTY East Petersburg (717) 560-1908 Lancaster City (717) 397-8081

LEBANON COUNTY Renaissance (717) 274-2741

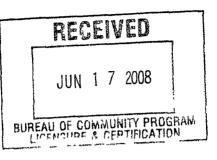
YORK COUNTY York (717) 840-0984 York City (717) 848-6116

CHILDREN'S SERVICES:

Adams (717) 337-0751 Berks (610) 670-9923 Cumberland/Perry (717) 243-7534 Dauphin (717) 526-4889 Lancaster (717) 392-8848 Lancaster MST (717) 509-0130 Lebanon (717) 274-9686 York (717) 854-6800

ADMINISTRATIVE OFFICE:

200 North Seventh Street Lebanon PA 17046 Ms. Janice Staloski, Director Bureau of Community Program Licensure and Certification Department of Health Ste A, 132 Kline Plaza Harrisburg, PA 17104-1579



Dear Ms. Staloski,

INDEPENDENT REGULATORY REVEN CONVINSION

June 10, 2008

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. Pennsylvania Counseling Services, Inc.(PCS) is a behavioral health agency with offices in seven counties in south-central Pennsylvania. Our mission is that our clients would see themselves as valuable, and it is our goal to help these children, adults and families discover their greatness. Pennsylvania Counseling Services 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.

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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, Mnique Budn



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Pennsylvania Counseling Services - Lancaster City 40 Pearl Street, Lancaster, PA 17603 · (717) 397-8081 · Fax: (717) 397-8414 · pacounseling.com

	Roy A. Smith Ir: Ph.D. President, CEO • Ruth M. Davis, MBA, Executive Vice-President
OUTPATIENT OFFICES	BEVEV COLLISSION DECEMED
ADAMS COUNTY Gettysburg (717) 337-0026	
BERKS COUNTY Reading City - 5th St (610) 685-2188 Reading City - Penn St (610) 478-8088 Wyomissing (610) 670-7270 CUMBERLAND COUNTY Carhsle (717) 245-9255	Ms. Janice Staloski, Director Bureau of Community Program Licensure and Certification Department of Health Ste A, 132 Kline Plaza Harrisburg, PA 17104-1579
Mechanicsburg (717) 795-8363	Dear Ms. Staloski,
DAUPHIN COUNTY Harrisburg (717) 671-9610	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. Pennsylvania Counseling Services, Inc.(PCS) is a behavioral
LANCASTER COUNTY East Petersburg (717) 560-1908 Lancaster City (717) 397-8081	health agency with offices in seven counties in south-central Pennsylvania. Our mission is that our clients would see themselves as valuable, and it is our goal to help these children, adults and families discover their greatness. Pennsylvania Counseling Services
LEBANON COUNTY Renaissance (717) 274-2741	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
YORK COUNTY . York (717) 840-0984 York City (717) 848-6116	companies and managed care organizations for higher levels of care, continued care, and appropriate medications.
CHILDREN'S SERVICES: Adams (717) 337-0751 Berks (610) 670-9923 Cumberland/Perry (717) 243-7534 Dauphin (717) 526-4889	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.
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	Sincerely, Judith E Crews

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200 North Seventh Street, Lebanon, PA 17046 • (717) 273-1710 • Fax: (717) 273-1416 • pacounseling.com Roy A. Smith JE, Ph. D., Present, GEO • Ruth M. Davis, MBA, Executive Vice-President FE', E'/ (C ·) ''(SO(C')

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BERKS COUNTY Reading City - 5th St (610) 685-2188 Reading City - Penn St (610) 478-8088 Wyomissing (610) 670-7270

> CUMBERLAND COUNTY Carlisle (717) 245-9255 Mechanicsburg (717) 795-8363

> > DAUPHIN COUNTY Harrisburg (717) 671-9610

LANCASTER COUNTY East Petersburg (717) 560-1908 Lancaster City (717) 397-8081

> LEBANON COUNTY Renaissance (717) 274-2741

YORK COUNTY York (717) 840-0984 York City (717) 848-6116

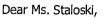
CHILDREN'S SERVICES:

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ADMINISTRATIVE OFFICE;

200 North Seventh Street Lebanon PA 17046 (717) 272-1653 June 9, 2008

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



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. <u>Pennsylvania Counseling Services</u>, Inc. (PCS) is an outpatient behavioral health agency with offices in 7 counties in south-central Pennsylvania. <u>Our</u>, mission <u>statement is "People are valuable</u>. Therefore PCS exists to help children, adults and families discover their greatness." <u>Pennsylvania Counseling Services</u> 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.

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Sincerely,

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Roy A. Smith, PhD President, CEO

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CELENDER OF A. Smith Jr, Ph.D., President, CEO • Ruth M. Davis, MBA, Executive Vice-President FE E.1 CC'" SS'"! **OUTPATIENT OFFICES** ADAMS COUNTY Gettysburg (717) 337-0026 June 10, 2008 2654 RECEIVED BERKS COUNTY Ms. Janice Staloski, Director Ponce (610) 320-5440 Bureau of Community Program Licensure and Certification Reading City - 5th St (610) 685-2188 Reading City - Penn St (610) 478-8088 Department of Health JUN 1 2 2008 Wyomissing (610) 670-7270 Ste A, 132 Kline Plaza CUMBERLAND COUNTY Harrisburg, PA 17104-1579 BUREAU OF COMMUNITY PROGRAM Carlisle (717) 245-9255 Mechanucsburg (717) 795-8363 LICENSURE & CERTIFICATION Dear Ms. Staloski, DAUPHIN COUNTY Harrisburg (717) 671-9610 The purpose of this letter is to express support of the proposed regulation LANCASTER COUNTY amendment of the client confidentiality provisions for clients who are receiving East Petersburg (717) 560-1908 Lancaster City (717) 397-8081 drug and alcohol services. Pennsylvania Counseling Services, Inc. (PCS) is a behavioral health agency with offices in seven counties in south-central Pennsylvania. Our mission LEBANON COUNTY is that our clients would see themselves as valuable, and it is our goal to help these Renaissance (717) 274-2741 children, adults and families discover their greatness. Pennsylvania Counseling Services has advocated for change in § 255.5(b) for over a decade. The current regulations are YORK COUNTY York (717) 840-0984 York City (717) 848-6116 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, CHILDREN'S SERVICES: and appropriate medications. Adams (717) 337-0751 Berks (610) 670-9923 Cumberland/Perry (717) 243-7534 Dauphin (717) 526-4889 The increase in and development of co-occurring treatment has made this problem even Lancaster (717) 392-8848 Lebanon (717) 274-9686 more apparent. In some cases clients cannot get authorization for needed medication York (717) 854-6800 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 ADMINISTRATIVE OFFICES: benefits. The problems with § 255.5(b) make it difficult to work with other important 632/634 Cumberland Street Lebanon PA 17042 partners in the individual's recovery process such as the child welfare system, the Social *350 North 6th Avenue Security Administration, and the criminal justice system. Lebanon PA 17046 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, MSW, (SW CORBIN, MSW, CSW