

ADMINISTRATIVE OFFICES

LAWRENCE J DEVLIN  
CHAIRMAN

TERENCE MCSHERRY  
PRESIDENT & CEO  
499 N Fifth Street, Suite A  
Philadelphia, PA 19123  
Phone: 215-451-7000  
Fax: 215-451-7110  
www.net-centers.org

ADULT BEHAVIORAL  
HEALTHCARE SERVICES

Bridge Street  
Counseling Center

NET Steps Program

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Counseling Center

Wharton Residential Center

Kirkwood  
Detoxification Center

PA CHILDREN, YOUTH AND  
FAMILY SERVICES

Foster Care and  
Adoption Services

PA Child and Family  
Behavioral Health Services

Springfield  
Counseling Center

DE CHILD AND FAMILY  
BEHAVIORAL HEALTH SERVICES

Iron Hill Residential Center

Red Lion Residential Center

2654

June 6, 2008

Ms. Janice Staloski, Director  
Bureau of community Program Licensure and Certification  
Department of Health  
Suite A, 132 Kline Plaza  
Harrisburg, PA 18104-1579

Dear Ms. Staloski:

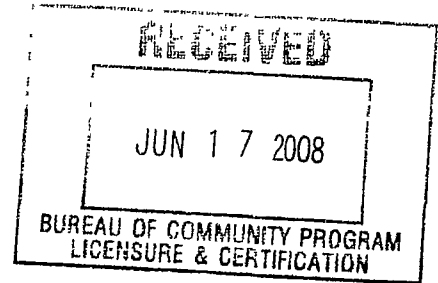
The purpose of this letter is to express **support of the proposed regulation amendment of the client confidentiality provisions** for clients who are receiving drug and alcohol services. NorthEast Treatment Services, Inc (NET) is an agency whose primary mission includes addiction treatment in residential outpatient and intensive outpatient levels of care. We see over two thousand people each year.

NET 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 The current regulations are outdated, unnecessary and impede the coordination of care.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. Parenthetically, we provide care in other states whose standard on confidentiality mirrors the federal standard, and have encountered no issues in over twenty five years.

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(b). 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 in an untenable position. We either share what needs to be shared (with the client's consent) to get needed services approved and risk citation

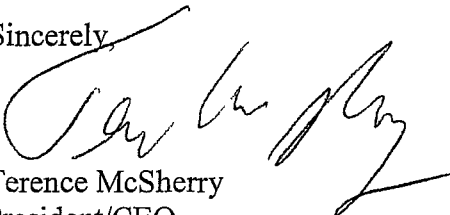
INDEPENDENT REGULATORY  
REVIEW COMMISSION



by licensing or do not share the information and have services denied. NET has chosen to assure the client has services they need.

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 and to make enrollment in these services not a disadvantage.

Sincerely,



Terence McSherry  
President/CEO

Cc: Lynn Cooper – Pennsylvania Providers