



Treatment Trends, Inc.

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

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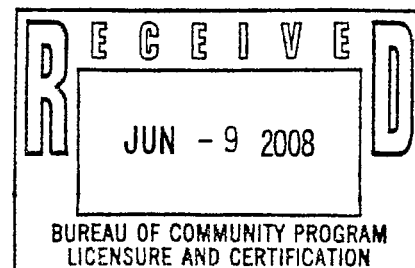
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INDEPENDENT REGULATORY
REVIEW COMMISSION

June 6, 2008

Janice Staolski, Director
Bureau of Community Programs
Licensure and Certification
Department of Health
132 Kline Plaza, Suite A
Harrisburg, Pa. 17104



Dear Ms. Staloski:

Commenting on propose changes to Department of Health's Proposed Regulation No. 10-106 regarding Confidentiality of Drug and Alcohol addiction treatment patient records and information.

Current Standards:

- *Protect the Confidentiality of persons in Treatment.
- *Do not require treatment providers to share sensitive and personal information with Insurance Companies and 3rd Party Payers
- *Federal Standards 42CFR permit release of information with a special Court order under limited circumstances.

Proposed Changes:

- *Will serve to undermine the Pennsylvania Placement Criteria, which are the required Medical Necessity Criteria for public funded clients in Pennsylvania.
- *May be used to limit treatment as historically has been the case with Insurance Companies.
- *Sensitive information may be used to deny rather than expand care to individuals.
- *Exceed the Federal Standards under 42CFR by allowing broad access to Court Ordered release of records with out clients consent – causing confusion and possible breach of Federal Standards.
- *Permission to do Oral Consent to release information would increase the likelihood of non-consensual release of information.
- *Increased documentation (rather than the 5 in the Current Standards) and record maintenance to comply for Treatment Providers will equate to additional time and money for them.
- *Loss of Protection to Privacy rights for individuals suffering from this stigmatized disease.

I have worked in this field for 50 plus years and learned "If it isn't broken don't fix it."

Please withdraw the proposed changes.

Sincerely

Annabelle H. Dittbrenner, RN
Quality Assurance Coordinator
Treatment Trends, Inc.

