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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

As a professional working in Drug and Alcohol treatment, I strongly object to the Department of Health's Proposed Regulation No. 10-186 as currently written.

Under the new proposed rule, definitions are so ambiguous that the role of government and payer is confused with the role of those providing hands-on treatment thus inviting the payer to intervene with treatment and to substitute his/her judgment for that of the treating professional without ever having laid eyes on the individual.

I believe the current rules adequately protect the individual seeking treatment and their records. Managed care organizations routinely inspect records. I see no need for a government organization or managed care organization to be privy to sensitive confidential patient information other than on their periodic reviews. The changes proposed in the draft will significantly weaken, confuse and complicate the issue of confidentiality protections of sensitive patient information to the most vulnerable patients.

Sincerely,
Ron Fry

Ron Fry

CC:
Independent Regulatory Review Commission
Representative Frank Oliver
Senator Edwin Erickson
Representative George Kenney
Senator Vincent Hughes
Jerry Rhodes, President, CRC Health, Recovery Division
Deb Beck, President, DASPOP