



# WHITE DEER RUN OF STATE COLLEGE

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July 3, 2008

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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

