

# Treatment Trends, Inc.

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

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July 9, 2008

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

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Dear Ms. Staloski:

I am writing to *oppose* the proposed regulations changes (No. 10-186) regarding client confidentiality for drug and alcohol clients.

The existing law provides adequate protections and needs no tinkering. Our clientele have trust issues already and any erosive actions, such as what is being proposed, only furthers the gap and creates barriers and excuses to not seek treatment.

The overriding concern is the real motivation driving the proposed changes. The stated concerns would mean that extremely personal and private information would be provided to insurance company reviewers whose sole existence is to limit the amount of treatment a client obtains.

Such sensitive information needs to remain in the trust and confidence of a personal relationship between client and counselor, not some anonymous third-party benefit valve opener who has no personal connection to a case. It is this depersonalization of human suffering and titrating of benefits that has taken the "heart" out of our field and society. Caring involves protection, in this case from the very profit-oriented managed care companies who want to save money from a population who should get every bit of service we can deliver because, more often than not, our clients get less than they need.

The issues of the release of information about medical diagnoses to parole and probation officers only invites further mistrust, since authority figures are perceived as another entity to protect against if too much is known.

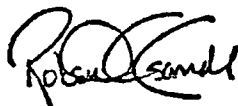


United Way of the  
Greater Lehigh Valley

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So please, stand back and recognize we all share a common mission that involves providing a system of care that first and foremost does no harm. When insurance companies or other entities whose priority is profit or leveraging consequences through protected client-counselor relationships, we need to see through the thinly veiled beneficence “for the good of our clients” arguments and take a stand. Oppose these misdirected changes and leave the confidentiality laws stand as they are.

Sincerely,



Robert Csandl, MHS, LPC  
Executive Director  
Treatment Trends, Inc.

cc: Independent Regulatory Review Commission  
Rep. Frank Oliver, Health & Human Services Committee Maj. Chairman  
Rep. George Kenney, Health & Human Services Committee Min. Chairman  
Sen. Edwin Erickson, Public Health & Welfare Committee Maj. Chairman  
Sen. Vincent Hughes, Public Health & Welfare Committee Min. Chairman  
Deb Beck, President, D&A Service Providers Organization of PA (DASPOP)  
Michael Harle, Executive Director, Gaudenzia  
Sheryl Williams, Director, Department of Health  
Bill Stauffer, Program Director, Halfway Home of the Lehigh Valley  
Ron Young, Pennsylvania Department of Health  
Bruce Groner, Chairperson, Treatment Trends, Inc.  
Jack Bury, Vice-Chairperson, Treatment Trends, Inc.