



**WHITE DEER RUN**  
*Committed to Excellence*  
A Member of CRC Health Group

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2654

July 11, 2008

**VIA CERTIFIED MAIL DELIVERY**

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

Dear Ms. Staloski:

Enclosed for your review are several petitions expressing opposition to the proposed changes in PA Code 255.5(b), Draft Rulemaking Regulation No. 10-186. We ask that these views be taken into deliberation before a ruling is made in this matter.

Thank you for your consideration.

Respectfully,

Joseph A. Procopio  
Regional Vice President CRC Health  
Executive Director, White Deer Run

Enclosures

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

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2008 JUL 17 AM 10:03  
INDEPENDENT REGULATORY  
REVIEW COMMISSION





# Lebanon Treatment Center

A Member of CRC Health Group

3030 Chestnut Street • Lebanon Pennsylvania 17042 • Phone 717.273.8000 • Fax 717.273.8244 • www.crchealth.com

We, the undersigned employees of The Lebanon Treatment Center, would like to formally state our opposition to the proposed changes in PA Code 255.5(b), Draft Rulemaking Regulation No. 10-186, regarding patient confidentiality. It is our belief that the proposed changes will further perpetuate public stigma as it relates to the disease of addiction, will lessen access and duration of treatment for patients in need, will cost treatment facilities additional expenditures to comply with mandated releases, and will not benefit consumers of treatment services.

[Signature & Date]

*[Signature]* 07/03/2008

*MT* 7-3-08

*Maria E. Lacey*

*May 7/3/08*  
*Quincy Bell, MSW, LSW*

*(M. Kerne) Bank* BSAW  
7-3-08

[Comments]

I oppose the proposed changes due to the increase in patient impact on treatment confidentiality.

I oppose the changes as I feel it won't benefit patients in tx and may be a barrier for patients gaining tx.

I oppose the changes as it won't benefit clients full confidentiality.

I oppose the proposal. I oppose the proposal because it will compromise confidentiality.

I oppose the proposed changes. Patient health history will lose confidentiality status and increased risk of patient losing treatment opportunities. 7-3-08

Cove Forge Behavioral Health System  
P.O. Box B  
New Beginnings Road  
Williamsburg, PA 16693

Toll Free Phone #: 1-800-873-2131  
Direct #: (814) 832-2131  
Administration Fax #: (814) 832-2133  
Email Address: www.crchealth.com

We, the undersigned employees of Cove Forge Behavioral Health System would like to formally state our opposition to the proposed changes in PA Code 255.5(b), Draft Rulemaking Regulation No. 10-186, regarding patient confidentiality. It is our belief that the proposed changes will make vulnerable previously protected information based on the judgment of treatment providers, will violate the bond of confidentiality between the provider and the client, will lessen access and duration of treatment for patients in need, will cost treatment facilities additional expenditures to comply with mandated releases, and will not benefit consumers of treatment services.

[Signature & Date]

*Kerri G. Cole 7/7/08*  
*Regina C. Vicari*  
*Julia Krambley*  
*April Anderson*  
*Don Butcher*  
*Brenda S. Holland*

[Comments]

*Confidentiality is of utmost importance*  
*One patient must be involved of confidentiality*  
*Confidentiality is of utmost importance*  
*proposed changes violate bond between <sup>client and</sup> provider*  
*Releases w/out consent of client are improper*  
*Client confidentiality is very important.*  
*Violates confidentiality between provider + client*