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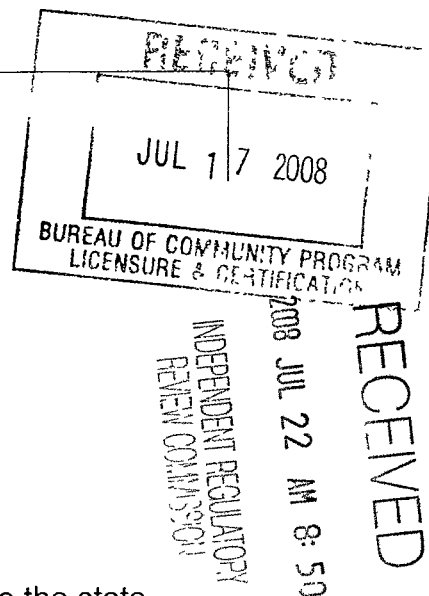
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July 14, 2008

Ms. 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,

I appreciate the opportunity to comment on the proposed changes to the state confidentiality rule (4 PA Code Section 255 5 (b)). This letter echoes my very strong sentiments expressed previously on the same matter (see letters attached dated January 11 and March 23).

I continue to be opposed to the changes on the basis that these will increase the amount of information available to parties other than those who are directly involved in the treatment of individuals with addictions. Already, the amount of data currently available to funding sources, probation / parole officials and governmental officials is sufficient to determine treatment admission eligibility. Moreover, the proposed changes may erode the potential effect of ACT 106 of 1989, which mandates insurance coverage of addiction treatment.

As President and Executive Director of Pennsylvania's largest nonprofit treatment service provider, I am morally and ethically bound to steadfastly guard the rights of deserving individuals who seek to overcome their addictions through treatment. Many of the points of information called for in the proposed regulations are very subjective and variable in their nature, i.e. a person's "motivation to change" and "level of intoxication" can change frequently – even daily – in the course of detoxification, assessment and evaluation for treatment appropriateness in the clients we see. The proposed regulations do not really define what information could be withheld from other parties, even when it has no impact on a treatment decision. There will be an extra – and costly – burden on the clinical and administrative staff in treatment facilities to determine what data is appropriate to transmit.

Last year, Department of Health prevalence statistics collected state-wide identified over 900,000 Pennsylvanians as having abused alcohol and drug use. Only approximately 10% of those who needed treatment to overcome their addictions actually accessed treatment, undoubtedly adding to the burden of our public health

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and welfare systems. This is the time for our Department of Health to lead the way for the expansion of treatment services to those who require them, and not produce unnecessary measures that can only hinder the path to treatment.

I urge the Department of Health to allow the existing regulations to stand as already written.

Sincerely,

Michael B. Harle, M.H.S.
President and Executive Director