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LACKAWANNA COUNTY COMMISSION  
ON DRUG AND ALCOHOL ABUSE  
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INDEPENDENT REGULATORY  
REVIEW COMMISSION

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EXECUTIVE DIRECTOR

July 2, 2008

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

Dear Ms. Staloski:

I am writing on behalf of the Northeast Regional Single County Authorities to express our concerns regarding the proposed changes to the state's confidentiality regulations which we believe will do the following:

- Weaken the client-counselor relationship by undermining the client's confidence in the protection of personal information shared in a therapeutic milieu, thereby inhibiting the pursuit of wellness and the promotion of recovery.
- Blur clearly defined limitations on what can be requested and place providers in the tenuous position of making decisions which could impact negatively on a client's right to privacy and a possible denial of coverage.
- Expand the categories of individuals with access to this information to those with no defined treatment role. The definition of "government officials" is ambiguous at best.
- Heighten the potential for the criminalization of addiction contrary to the treatment of any other medical condition or disease.
- Increase the risk to the client, and by extension to family and associates, of criminal prosecution due to the intrusive nature of the expanded information allowable under the proposed regulatory changes and its indiscriminate dissemination to individuals not directly involved in the treatment process.
- Discriminate against clients not covered by ACT 106.

Please know that our sole interest is in providing the addicted client with a secure environment in which to engage in treatment. This includes respecting the confidentiality necessary for those struggling with the stigma of addiction. To do this the client's interests must come first. For this reason we do not support the Department's Proposed Regulation No. 10-186 as we believe it to be counterproductive, creating new barriers which will discourage a client's entry into treatment, undermine personal motivation, and increase the probability of recidivism. We ask that you retain the current regulations which are recognized nationally as a model for the treatment of the addicted population and limit information to that provided in the PCPC summary.

We thank you for the opportunity to respond to the proposed changes.

Sincerely,



Ann Marie Santarsiero  
Executive Director  
Lackawanna SCA

AMS/pc

cc: Phil Cusano-Bradford/Sullivan SCA  
Rich Mroczka-Carbon/Monroe/Pike SCA  
Mike Donahue-Luzerne/Wyoming SCA  
Robin Kaminski-Waldowski-Susquehanna SCA  
Susan Farnsworth-Schuylkill SCA  
Bonnie Tolerico-Wayne SCA  
Michele Denk – PACDAA  
Arthur Coccodrilli - IRRC