



November 19, 2010

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**VIA ELECTRONIC DELIVERY**

Shaye Erhard  
Office of Mental Health and Substance Abuse Services  
Department of Public Welfare  
233 Beechmont Building, DGS Complex  
P.O. Box 2675  
Harrisburg, PA 17105-2675

RE: Regulation No. 14-522

Dear Ms. Erhard:

As a general introduction my name is Joseph A. Procopio. I am the Regional Vice President for CRC Health which owns and operates an RTF unit at our Cove Forge facility located in Williamsburg, Pennsylvania. As such, I appreciate the opportunity to respond to the proposed rulemaking for 55 PA Code, Chapters 23, Sections 3800 and 5310.

As noted in the proposed rulemaking, we at CRC applaud the stakeholders and the State for making efforts to establish best practices standards for adolescents receiving services governed by the 3800 Regulations in the State of Pennsylvania; however, the proposal includes several areas of significant concern.

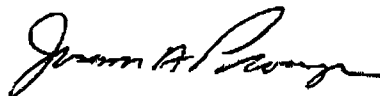
- By defining the maximum capacity of beds available to treatment centers and the limits set forth as such, we believe the State of Pennsylvania will suffer a lack of capacity to treat the acute needs of the youth across our State;
- The definition put forth for the credentials of staff delivering care to the clients in these treatment centers appears onerous and unrealistic for many existing treatment centers established in rural communities. Educational and other credentials such as outlined are not readily available in many parts of the State and will require extraordinary staffing efforts to be maintained at these treatment centers both in quantity and quality of staff;
- Staffing requirements as outlined will be cost-prohibitive, and our concern is that these staffing requirements alone will require an increase in per diem rates in excess of 50% per treatment day;
- We disagree with the statement in the preamble that, by raising the credentials of staff, lengths of stay will be shortened and thus result in cost savings which would offset the cost increases inherent in this proposal. In practice, we have yet to find evidence to support such a conclusion. Additionally, this rulemaking will result in a limitation of beds, making them available only to clients with the highest level of acuity, and likely resulting in greater lengths of stay and higher costs to consumers and payers.

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In summary, we believe the rulemaking in its current format, although well-intended, will likely bring many RTF facilities to a conclusion that this is no longer a viable treatment option given the costs, the limited availability of qualified staff and the increasing needs of the clients.

Thank you for the opportunity to express our concerns, and we look forward to an appropriate resolution for our efforts in providing Pennsylvania youth with an appropriate level of care.

Respectfully,



Joseph A. Procopio  
Regional Vice President

cc: Deb Beck, President – DASPOP  
Independent Regulatory Review Commission  
Mark Sarneso, Vice President of Government Relations – CRC Health  
Tom Callahan, Regional Director – Cove Forge Williamsburg