

# EMBARGOED MATERIAL

September 3, 2014

VIA Electronic Mail

3049

Corinne R. Brandt  
Regulatory Analyst  
Independent Regulatory Review Commission  
333 Market Street  
14<sup>th</sup> Floor  
Harrisburg, PA 17101

2014 SEP -3 PM 2:50

RECEIVED  
IRRC

Re: No. 3049, Regulation # 74-1: Standards for Licensure of  
Freestanding Treatment Facilities

Dear Ms. Brandt:

I write to you on behalf of Blue Cross of Northeastern Pennsylvania (BCNEPA) concerning the Department of Drug and Alcohol Programs' (the Department's) recent proposal to amend the General Standards For Free-Standing Treatment Facilities.

By way of background, for over 75 years, BCNEPA has provided health insurance to the residents of northeastern and north central Pennsylvania. We currently provide coverage for over 550,000 members and continually seek innovative approaches to reduce the cost of health care while improving health care quality and outcomes throughout our region.

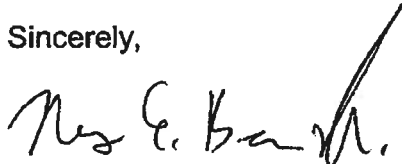
We appreciate and applaud the Department's efforts to update and streamline its licensure and regulatory requirements. We support this endeavor in general and support the Department's proposed revisions to the General Standards For Free-Standing Treatment Facilities. Nevertheless, in its efforts to update and streamline its licensure and regulatory requirements, we respectfully request that the Department consider updating the disclosure requirements found in 4 PA Code Section 255.5. Although well intended, the aforementioned regulations have not been updated in over two decades. To that end, we believe these regulations have not kept pace with the many changes in health care reimbursement during this time. The confines of these regulations often present challenges to health insurers to ensure that consumers receive timely and effective addiction recovery services. Consequently, we believe updating the regulations in 4 PA Code Section 255.5 should be a priority of the Department in its efforts to update and streamline its licensure and regulatory requirements.

Thank you for the opportunity to review and comment on the proposed revisions to the General Standards For Free-Standing Treatment Facilities. Should you have questions or concerns regarding the contents of this letter or this matter in general, please feel free to contact me at the following address:

500 North Third Street  
Suite 6B  
Harrisburg, PA 17101  
(717) 213-6914  
Norris.Benns@bcnepa.com

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Norris E. Benns, Jr.", with a long, sweeping flourish extending upwards and to the right.

Norris E. Benns, Jr., Esq.  
Director, Regulatory Affairs

cc: Fiona E. Wilmarth  
Ronald G. Young