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April 8, 2014

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VIA Electronic Mail

Ronald G. Young  
Director  
Division of Program Licensure  
Department of Drug and Alcohol Programs  
132 Kline Plaza  
Harrisburg, PA 17104

Re: Proposed Revisions to the General Standards For Free Standing Treatment Facilities

Dear Mr. Young:

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 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, 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 make sure that consumers receive timely and effective addiction recovery services. Consequently, we believe that 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.

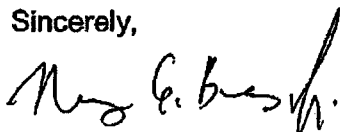


Thank you for the opportunity to comment on the proposed revisions to the General Standards For Free-Standing Treatment Facilities. Should you have questions or concerns regarding the contents of this letter or this matter in general, please feel free to contact me at the following address:

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,



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