



April 2021



Ms. Jennifer Smith, Secretary,  
Pennsylvania Department of Drug and Alcohol Programs  
via email

**Reference:** Standards for Drug and Alcohol Recovery House Licensure

Dear Director Smith:

I am writing for the R3House Sober Living Community in Lancaster PA. I believe I also speak for most of the recovery houses and sober living homes in the Lancaster area.

Today, we wish to express concern over the regulations recently proposed by the Department, and to express our deep concern for adoption of these regulations as written.

We believe that this package of regulations would decrease safety in recovery residences, would not provide assurances that essential recovery support services are provided, and would severely limit access to quality recovery residences for individuals seeking this recovery support.

To be frank, we do not believe that the regulations will increase resident safety. Certainly, we share DDAP's concerns over resident safety and encourage appropriate efforts to ensure that recovery homes are not overcrowded, follow appropriate fire safety precautions, and that high-quality services and supports are provided.

The regulations announced recently, and which we have reviewed, appear to be changed significantly since the draft sent out almost two years ago and to which we have already replied.

As stated above, the Lancaster Recovery Community previously provided feedback to the draft DDAP Regulations:

- Our previous input does not appear to have been taken into consideration when the regulations were adopted, which in itself is also concerning.
- We already expressed concern that the draft regulations distributed in 2019 would lead to many unintended consequences for the recovery communities and people in recovery throughout the state.
- We also expressed concern that the regulations appear to have been written for *medical facilities* and not recovery homes or sober living communities.
- In addition, we were clear that people managing recovery homes and on the front lines of addiction recovery are best suited to provide inputs to the regulation and policy development process.
- DDAP did not provide feedback to our concerns raised in June of 2019, specifically our concerns on those regulations which appear to be directly adopted for *medical facilities* and are not applicable for self-managed group home recovery environments.



April 2021

Given the exponential rise in alcoholism, overdose deaths and other social and familial impacts of the COVID-19 pandemic, we are deeply concerned that these regulations will exacerbate the risks to people suffering from addiction by placing them at increased risks of homelessness and other high risk situations.

We seek to understand the following regarding the policies, procedures and reviews conducted by DDAP before adopting the latest round of regulations:

- What review process was undertaken to evaluate the appropriateness for additions made to the draft DDAP regulations sent out in 2019
- What review process and objective measurements will be undertaken to evaluate the impact of these regulations on the availability of affordable sober living environment for residents in Pennsylvania suffering from the affliction of addiction.
- What guidance have you prepared for treatment centers who are seeking to place people in recovery homes but no options because quality recovery home businesses have opted not to pursue DDAP licensing.
- What impact studies were done to individuals and families and communities concerning the increases in homelessness and overdoses anticipated from the new regulations.
- What impact studies have been done to small communities in PA that will be faced with increased first responder and emergency room calls given the impacts of these regulations.
- What impacts studies have been done to larger communities in PA like Philadelphia, Scranton, Lancaster, Pittsburgh, etc, that will be faced with increased first responder and emergency room calls given the impacts of these regulations.
- Have Governor Wolf and the PA State Legislature been made aware of the probable impacts of these regulations and are they prepared for the resulting social, legal and medical issues in our state.

In conclusion, we ask you to reconsider the actions you are taking and seek additional inputs, especially from the National (and Pennsylvania chapter) Association of Recovery Residences. We also offer our time and services to support the safe licensing and operations of recovery and sober living homes in PA and the United States.

Thanks in advance for your kind consideration and for your support of people and families facing the crisis of addiction in Pennsylvania.



John Roberts  
Executive Director  
R3House LLC  
[John@r3house.com](mailto:John@r3house.com)