



ANOTHER DAY CLEAN RECOVERY HOMES

October 14, 2021

RE: Recovery House Certification Regulations

To Whom It May Concern:

We would like to voice several concerns about the recovery house certification draft that is currently being instituted by DDAP. First, we believe that there should absolutely be a certification process for recovery houses in Pennsylvania. However, as these rules are now written, we believe that many programs will not be able to absorb the financial burdens of getting their house up to the listed standards and may be forced to close. This will severely limit housing options for individuals in early recovery in the state, and the population most affected will be those individuals who are indeed the most vulnerable.

Our major concerns at this point include, but are not limited to, the following:

- We are simply “landlords” providing a structured home environment for those in recovery. Our residences, legally, are not a business or treatment facility, otherwise we would not be allowed to be in a residential zoning district. Therefore, we do not have to install handicapped accessible features, again, since other regular single family homes are not required to do so. We also are only a safe and structured housing environment and are not equipped to accept people with significant health and physical restrictions.
- All safety codes and use & occupancy requirements should be in accordance with the regulations in the township/borough in which the house is located. These codes are usually the standard BOCA (Building Officials Code Admin) which are instituted for public safety in homes and buildings.

- We do not feel we should have to agree to any degree of fiscal management decreed by the state, unless we are receiving funds from state and county agencies, as this is a privacy concern.
- Who is responsible for the required trainings? DDAP? And what will be the fees associated with this?
- How do we enforce a timeline for discharges? This is often a safety issue for the house and a resident may have to be removed immediately, especially in cases of discharge due to illicit substance use.
- We believe the paperwork requirements as they are currently written are over burdensome, and will cut into time that may be best served helping our residents to succeed. Most recovery house owners are not addiction treatment professionals and may lack the skill set necessary to implement this level of documentation.
- We do not feel it is in the best interest of our residents to have our addresses publically posted on a website, as this is a safety and privacy concern, and we currently do not post our addresses publically anywhere.
- Finally, we are one of the few programs in Pennsylvania that has a master's level clinician as one of our owners (my master's degree is in clinical mental health counseling plus I also identify as being in long-term recovery); most programs are simply owned and run by individuals who identify as being in long-term recovery. This gives us a unique perspective on these regulations, and I would like to state again, for the record, that recovery houses are not treatment facilities or halfway houses, we are simply a safe and supportive housing option for those in recovery. We exist to serve this special and vulnerable population and believe that this current draft of regulations will prevent us from doing so to our full potential as time will have to be focused on paperwork, documentation, and compliance.

Sincerely,

Rachel Machen, MA

Rachel Machen, M.A.

Owner / Program Director

484.369.3539