



County of Bucks

Office of the Commissioners

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County Commissioners
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GENE DIGIROLAMO



MARGARET A. MCKEVITT
Chief Operating Officer

March 25, 2021

Chairman Frank Farry
PA House Human Service Committee
18 East Wing / PO Box 202142
Harrisburg, PA 17120-2142

Senator Michele Brooks
Senate Box 203050
Room 168 Main Capitol
Harrisburg, PA 17120-3050

Secretary Jennifer Smith
Pennsylvania Department of Drug and Alcohol Programs
2601 N. 3rd Street
Harrisburg, PA 17110

Dear Chairman Farry, Senator Brooks and Secretary Smith:

The Bucks County Board of Commissioners is united in the following feedback regarding the **Standards for Drug And Alcohol Recovery House Licensure** regulations that have been promulgated by the Department of Drug and Alcohol Programs, as presented through the Independent Regulatory Review Commission (IRRC). We understand that a hearing will take place on April 15, 2021, and we are writing in advance, asking that you can share our concerns with your colleagues, in reconsideration of these excessive regulations.

Bucks County is the home of an estimated 200-plus recovery houses, of varying quality. We are supportive of legislative measures to improve the quality of life for recovery house residents, and we completely understand the challenges that recovery houses can bring to communities. We are proud of the many successes of our own Bucks County Recovery House Association (BCRHA), which has been in existence for over 20 years. We believe that our BCRHA is a model which could be adopted statewide. **We are prepared to offer our own BCRHA as the Pennsylvania alternative to the most recently presented Standards.**

Although there was input by Bucks County recovery house owners at the onset of the regulation planning, the most recent version of Licensing regulations far exceeded their recommendations and does not reflect their discussion. We are concerned that the current, highly regarded, recovery residence operators will not submit licensing applications, which in fact, will have a deleterious effect on our community. **Most**

importantly, the unintended consequences will result in residents with substance use disorders potentially not having access to currently monitored and high-quality recovery housing.

We have received feedback from recovery house operators that indicates they will not be applying for Licensing. In fact, we have not found one current recovery house operator who plans on submitting a Licensure packet. **The proposed regulations are just too burdensome, too costly, and too far reaching.**

We are supportive of the Pennsylvania Department of Drug and Alcohol Programs and their commitment to championing recovery supports. However, the proposed standards would treat recovery houses as if they were akin to treatment centers. Historically, treatment centers have included operational costs such as administrative staff, and personnel with high level academic degrees and finesse in working with government-related entities. They often employ staff who are assigned to oversee Training, Quality Assurance, Site Management, Fiscal Operations, in addition to other roles. We honor recovery house owners and operators for their life experience; many have lived experience with substance use disorders and did not have the benefit of training or academia, vastly different from treatment center leadership. Although we provide training to recovery house leadership, the focus is most often on real-life challenges such as conflict resolution and current drug trends.

The administrative cost of an Annual Financial Audit is just one example of the burden that cannot be borne by community-based recovery house operators and would cause a hardship and be impossible to carry out. The proposed standards create massive and unnecessary financial burdens for house operators, both in initial compliance costs and structurally beyond that point. Especially as our communities recover from COVID-19, now is not the time to impose high cost and unnecessary financial burden on residents who are seeking a sober, safe, and supportive housing environment. Although there may be some initial financial support from DDAP, this ongoing expense is not sustainable. **Simply put, residents cannot and should not be forced to pay increased per diem costs to support excessive administrative oversight.**

We are concerned that an unintended consequence will undoubtedly be residents who prematurely leave recovery residences and present challenges of continued substance use, in addition to other issues such as human trafficking, unemployment and homelessness. **We are concerned that hundreds of residents will be living in unregulated houses, in direct opposition with the goals of the standards. We have come so far in Bucks County, and statewide, in addressing these social determinants, we implore you to reconsider these Licensing standards, and perhaps replace them with a Certification with more reasonable requirements.**

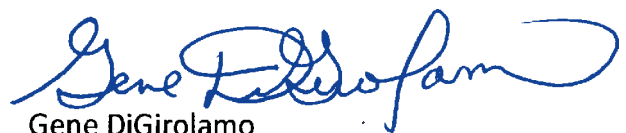
Respectfully submitted,



Diane Marseglia



Bob Harvie



Gene DiGirolamo