

Pittsburgh Sober Living

www.pittsburghsoberliving.com



To: Department of Drug and Alcohol Programs
c/o Policy Office

03/31/2021

To Whom It May Concern,

My name is Patrick Harvey and I am a managing partner of Pittsburgh Sober Living (PSL). We currently operate 9 sober living residences in the South Hills of Pittsburgh, PA. We have been in Business since 2009.

Of the 9 houses 8 are for recovering men, the ninth house is a women's house. We started this company with one house along with a dream to create a safe sober living environment, with strict accountability. Our tenants are required to attend 5 meetings per week, get a sponsor, and start working a twelve-step program immediately. Weekly house meetings with myself or my partner attending are mandatory for accountability. Please view our website at pittsburghsoberliving.com for complete information.

We are currently a member of West Parr (Western Pennsylvania Alliance of Recovery Residences) which is an affiliate of PARR. PARR of course is an affiliate of The National Alliance of Recovery Residences (NARR). We follow NARR standards 100% and all our houses are PARR certified. Pennsylvania parents, rehabs, jails, halfway houses, shelters, hospitals, etc. all know the quality of our sober house and are grateful to have a safe choice. The emergence of West Parr over the last couple of years has succeeded in the closings of many unfit houses.

This letter is in response to the Draft Recovery House Regulations put forth by DDAP. My first impression of the draft seemed to be that the requirements proposed by DDAP are almost exactly the same as the requirements DDAP proposes for Detox Centers, Halfway Houses, and Rehabs with "Transitional living services" inserted into the cover page. Unlike funded housing i.e. rehabs, halfway houses, and detox centers,

Pittsburgh Sober Living receives no funds other than rent from the tenants themselves. We have no staff other than a house manager who receives reduced rent. Recovery housing does not provide medical services. We provide safe sober living with strict accountability and are proud to say we have a 75% success rate.

The proposed regulations will make it virtually impossible for recovery housing such as ours to obtain a license. For instance:

- 1) Our houses are all certified and inspected by NARR standards. Why re-invent the wheel? NARR standard are recognized throughout the country and these standards are the norm in over 30 states presently. We believe Pennsylvania should do the same.
- 2) The DDAP requirements for House Managers would create undue financial burdens.
 - a) Criminal record checks would be costly and unproductive. Our house managers often serve as an immediate need due to another house managers departure due to work or relapse. Turnover can happen overnight. Requiring background checks prior to the mangers start date is unreasonable and virtually impossible.
 - b) 12 hours of training along with 6 hours (HIV) and 4 hours (tuberculosis) is impractical. We do over 6 hours training in the following for all house mangers: Administration, Confidentiality, Ethics, Cultural Awareness, NARCAN, CPR, HIV, and HEP C.
- 3) Paragraphs 709.140 - Residents Rights, 709.141 – Residents Records, 709.143 – Intake and Admission, 709.147 – Complaint Management, 709.148 – Notification to Family, 709.150 – Physical Plant Standards are all currently provided through NARR standards and policies.
- 4) We currently confirm to Paragraph 709.151 completely except for (b)2. Fire escapes may be necessary at a Detox, Rehab, or

Halfway house but would be extremely cost prohibitive We currently provide rope ladders as required by code which is no different than any other single-family home on the street. A fire escape could very well cost more than the dwelling itself.

In summary we agree to much of what is in the proposal except for the specific items mentioned above that go far beyond the current “common sense” standards and certification procedures that we have adopted being a member of NARR. Please consider using the NARR standards that have been used successfully in 32 states for over 30 years.

We have helped hundreds recover from alcoholism and drug addition in our brief history. We take many tenants in for free just to maybe give them a shot. There is magic in what we do. We live financially week to week. We make no money. Please don't overburden us with regulations and requirements that are above and beyond what we already do. Remember that the Number One Goal is providing a way out of the darkness of addiction for our tenants. How many can we help if we no longer exist?

I speak from experience, I have 35 years in active recovery and my partner has 15 years. We know what we are doing. Let's not louse this up.

God Bless,
Patrick J. Harvey

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