



July 6, 2021

Jordan Lewis, PhD, Policy Director  
The Pennsylvania Department of Drug and Alcohol Programs  
Via email

Dear Director Lewis,

Thank you for the opportunity to submit comments on the proposed Standards for Drug and Alcohol Recovery House Licensure through the Independent Regulatory Review Commission and resubmitted on June 14<sup>th</sup>, 2021.

PARR again would like the term “Licensure” changed to **Certification** as we do not believe there will be confusion between the terms.

It is stated while NARR, PARR and other similar organizations provide valuable resources to their members, their standards do not meet all statutory or regulatory requirements for licensure. PARR would like to address Section 2313-A identifies twelve specific areas the department must include in the regulations for the licensure of drug and alcohol recovery houses and crosswalk with the NARR Standards 3.0 (**Attached**)

- Section 7 717 22(b)(2) requires drug and alcohol recovery houses to have a policy that ensures that residents are informed of house rules, residency requirements and lease agreements.
- **NARR Standard B5 Core Principle: Uphold Residents Rights**
- Section 7 17 1 requires drug and alcohol recovery houses have polices and procedures for management of funds received and expended in accordance with standard accounting practices, including funds received from or managed on behalf of residents.
- **NARR Standard A3 Core Principle: Be Financially Honest and Forthright.**

- Section 7 17 1 (7) requires drug and alcohol recovery houses have policies regarding criminal background checks for operators and employees.
- NARR Standard A C2 Core Principle: (f) Adhere to Legal and Ethical Codes and use Best Business Practices.
- Section 7 17 25 (b)(5) requires drug and alcohol recovery houses have a policy that no owner, employee, house officer or related individual shall directly or indirectly solicit or accept a commission, fee, or anything monetary or material value from residents, other related individuals, third party entities or referral sources, beyond specified rent established in writing at time of residency.
- NARR Standard A2 Core Principle: (g) Adhere to Legal and Ethical Codes and use Best Practices, A 3 (b)(d) Be Financially Honest and Forthright.
- Section 7 17 30 requires drug and alcohol recovery houses to have policies and procedures addressing the safety and protection of residents.
- NARR Standard F17 Core Principle: Promote a Safe and Healthy Environment, Promote Home Safety (a)(b)(c)
- Section 7 requires drug and alcohol recovery houses to have policies that promote recovery by requiring resident participation in treatment, self-help groups or other recovery supports.
- NARR Standard G20 (a), 21(a)(b)(c), 22(a)(b), 24(a)(b), 25(a) Core Principle: Facilitate Active Recovery and Recovery Community Engagement.
- Section 7 17 28 (2) requires drug and alcohol recovery houses to have requiring abstinence from alcohol and illicit drugs.
- NARR Standard F16 Core Principle: Promote a Safe and Healthy Environment. Provide an Alcohol, and Illicit Drug Free Environment (a)(b)(c)
- Section 7 17 24 requires drug and alcohol recovery houses to have procedures regarding use and security of medication.

- NARR Standard F16 Core Principle: Provide a Safe and Healthy Environment. Provide an Alcohol and Illicit Drug Free Environment (d)(e)
- Section 7 17 30(c) and 7 17 30 require drug and alcohol recovery houses to maintain the property in which the house is located, including the installation of functioning smoke detectors, carbon monoxide detectors and fire extinguishers and compliance with local fire codes.
- NARR Standard F17 Core Principle: Provide a Safe and Healthy Environment. Promote Home Safety (a)(b)(c)
- Section 7 17 25 (b)(1) requires drug and alcohol recovery houses to have policies and procedures which prohibit an owner, house administrator or employee from requiring a resident to sign any document for the purpose of relinquishing the resident's public assistance benefits, including but not limited to, medical assistance benefits, cash assistance and Supplemental Nutrition Program benefits.
- NARR Standard A2 Core Principle: Operate with Integrity, Adhere to legal and Ethical Codes and use Best Business Practices. 2 (h) 3(a)(c)
- Section 7 17 32 provides the departments policies and procedures for managing complaints.
- NARR Standard J4 Core Principle: Be a Good Neighbor. Be Responsive to Neighbor Concerns. 30 (a)(b) 31(a)
- Section 7 17 27 requires drug and alcohol recovery houses to notify a family member or other emergency contact designated by the resident under certain circumstances, including death to an overdose.
- NARR Standard F 16 Core Principle: Promote a Safe and Healthy Environment. Plan for Emergencies including Intoxication, Withdrawal and Overdose. 19 (a)(b)(c)(d)