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JORDAN LEWIS, PhD, Policy Director

The Pennsylvania Department of Drug and Alcohol Programs

2601 N. 3rd Street, 5th Floor

Harrisburg, PA 17110

Dear Director Lewis,

This letter is in regard to the most recent suggested regulations regarding recovery house licensure in Pennsylvania. We appreciate that you are looking at these options and accepting feedback from recovery house owners and operators. We are aware that some of the previous recommendations have been changed and/or removed, however, we still feel that these regulations are not feasible or possible for recovery houses to comply. When we estimate the costs necessary to apply for licensure, it exceeds what the community can pay for recovery housing. If we were to make the changes and the new regulations, we would need to raise our prices to probably, at least double, what they are now, and the people in need of this type of housing simply cannot afford that. It appears that many of the things that are being requested of recovery house owners are the same, or they exceed the things that treatment facilities and halfway houses are asked to do. I am aware that treatment facilities are paid a minimum of \$300 per day, usually more. Halfway houses receive about \$125 a day or more, while recovery houses charge \$25 a day, and are often not paid at all. In order for us to comply to these regulations and to apply for licensure, we would need to hire additional staff and incur a lot of other charges which we would need to pass on to our residents. Since our residents cannot afford this, we would essentially be forced to close our doors. This is true for many of the other recovery houses in our area, and I assume all across the state. Here are some examples of the issues we see:

1. \$250.00 fee per year per house, if house does not pass first time additional fees apply. (Costly to recovery houses making approximately \$25.00 per day per person who is able to pay anything.)
2. Complaints can be made anonymously and fines for violations of \$100 per incident. (Costly and unfair. We have experienced situations where other owners of so-called "rogue houses" make fake complaints against the "good actors" wasting time for everyone) Also if a house is fined 3 times for complaints, they can be shut down????
3. Keeping personnel records and resident records for 4 years. Costly and difficult for small businesses to keep up with. Also creating and implementing policies is not something most recovery houses have done before, we may need help in creating these.

4. Many stipulations for house managers. House managers change frequently and trainings are difficult to find and keep up with. Also, trainings are costly. Will the state or county offer free trainings on a monthly basis to keep up with the constant turnover of managers across the state? Where do we begin to come up with a training plan if we haven't had training ourselves? Will DDAP give us a sample or help with this?
5. Policies and procedures for managing funds? Isn't this covered in yearly income taxes?
6. State Police criminal background checks: Costly
7. Regarding discrimination: This says we cannot discriminate due to gender or expression. If a transgender person who presents as one gender but is still another gender but wishes to live in a house with persons who present as they do, we have to protect the other residents of the house by denying them. (a male must live in a male house, and a woman must live in a women's house) Also it says we cannot discriminate on ability to pay. We cannot allow residents to live for a long period of time without paying, nobody can afford this.
8. Medication Storage: What is this? It needs to be clearer what is expected. Also needs to be explained what is suggested to handle theft, loss or misuse.
9. 717.27 states that a resident can revoke consent to emergency contacts, then contradicts itself by saying the recovery house MUST notify emergency contact if someone leaves.
10. Keeping exterior exits, stairs, and walkways at night will be costly to install and maintain
11. 717.30 states, ladders to escape must be affixed to house. Unreasonable and costly, will be a problem in residential areas.
12. Keeping the house between 65 and 90 at all times may not be possible. Appropriate ventilation such as fans should be acceptable.
13. Giving someone 24 hours' notice before asking them to leave is not possible when a resident is under the influence of drugs or alcohol or has exhibited behavior that is unacceptable or violent in nature. We need to dismiss these individuals immediately for their safety and the safety of the house.

All in all, these regulations create a hardship that the large majority of recovery houses in Pennsylvania simply cannot afford. If these regulations go into law, the "good actors" will close, and the "rogue houses" who do not follow any guidelines and do not report to anyone will continue to exist. This will deny people in need of recovery housing any good options. I thank you for the work you are trying to do and I implore you to reconsider these suggestions.

Thank You,

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