

# K I N G S V I E W

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FBI - WASHINGTON  
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August 17, 1999

Documents Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville MD 20857

RE: RIN 0910-AA52 Narcotic Drugs in Maintenance and Detoxification Treatment of Narcotic Dependence; Repeal of Current Regulations and Proposal to Adopt New Regulations

Dear Colleagues:

I want to make this comment about the proposed repeal of current FDA rules concerning narcotic treatment programs and adoption of accreditation standards instead.

Section II.C.3. (page 39813) states "an accreditation-based system provides an opportunity to reduce the layers of inspections from Federal, State, and local regulatory entities. State authorities may choose to apply to act as accreditation bodies for programs in their jurisdiction and, if approved, would consolidate inspections and minimize burdens... treatment programs would be expected to absorb modest accreditation fees." This will all come true if state regulatory agencies bow out of their role at the same time accreditation standards come into place. There is **no guarantee** that will happen. If it doesn't happen at the same time, accreditation simply replaces one layer of regulation with another. This new layer of regulation called accreditation, however, costs providers money. I recall looking into this a year ago and finding that it would cost our clinic about \$4,000 per year for CARF accreditation. We already pay over \$6,000 in state licensing fees, and together these two costs would amount to about \$10,000 per year. Since we operate a clinic at a high professional and clinical level already, the net effect of all these changes would be to decrease the resources available for actual treatment.

Sincerely,



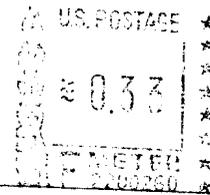
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