

Title 69 Series 11
Department of Health and Human Resources
Office of Inspector General
Office of Health Facilities Licensure and Certification
MEDICATION-ASSISTED TREATMENT – OPIOID TREATMENT PROGRAMS

Summary of Public Comments:

Comment

In §2.41, the word Oxycontin should be followed by the trade-mark symbol.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

In §2.47, the term “advance practice registered nurses” should read “advanced.” This term should be followed by the word “and” not “or.”

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

Consideration should be given to inserting the word “outpatient” before the words “medication-assisted treatment in §5.1.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

Is §5.3 applicable to an OTP, or should it be omitted

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

The language in §21.10 implies that all treatment at another MAT must be in accordance with guest dosing under §30.14; was this the intent? Guest dosing is different from the transfer of a patient to another MAT program; §30.14 may need to be separated.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

We can find no support for physical or biopsychosocial evaluations every 90 days, only “a review of treatment plans” every 90 days initially. Insurance companies are unlikely to reimburse for quarterly assessments, so please delete them.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

The words “unique to that program” in §6.1.e. are problematic and should be removed. Each of Acadia’s clinics is both an OTP and an OBOT with one physician covering both.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

Medical directors can also cover more than one location. Requiring a medical director to practice 90 percent of the hours in which an OTP is operating in §8.4.e. is inconsistent with the statute and should be deleted from the rule. If this requirement remains, most MAT clinics will close.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

Likewise, the words “shall be present during all hours of operation and” should be stricken from §8.4.f.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

The words “when medication is being administered” should be inserted after the word “operation” in §8.5.d.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

The words “except as provided in §§ 9.2.c. and 9.2.d.” should be inserted at the beginning of §9.2.b.

Response

The Department has reviewed this comment. Existing provisions in the rule address this issue and, therefore, no changes were made.

Comment

OTPs do not write prescriptions for MAT medications; therefore, §17.10 should be deleted.

Response

The Department has reviewed this comment and no changes were made in response. The rule provision is consistent with the requirements of the statute.

Comment

The words “or sooner if directed by the program” should be added to §18.4.c.2.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

Completing a full physical every 90 days is excessive and should not be required in §20.7.e.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

Is the intention of §21.10 to be in accordance with guest dosing in §30.14?

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

The words “including physical and biopsychosocial assessments” should be deleted from §25.4.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

Likewise, the 90-day interval for physical assessments in §27.2.d. is excessive and should be replaced with six months.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

Dr. Jafary writes that it seems “absurd, unethical and impossible” for lawyers to regulate these programs without input from practicing programs. He predicts a rise in drug abuse, overdose and crime if very few physicians will prescribe buprenorphine due to the financial and manpower requirements of compliance. He asserts that most practitioners are self-employed – not rich companies – who serve patients from a wide geographic area. Dr. Jafary also claims to be closing his service in the coming month, which will lead to “mayhem and ruined lives.” Although the form letters purport to be in opposition to the office-based medication-assisted treatment program regulations, they were enclosed with Dr. Jafary’s letter regarding opioid treatment program rules. The forms state that the proposed regulations are overly cumbersome, seriously jeopardize treatment, and stereotype opioid patients.

Response

The Department has reviewed these comments. This comment is general in nature and offers no specific areas for amendment.

Comment

As a methadone clinic, we already comply with more than 1,800 federal standards, are licensed by the DEA, SAMSHA, and the State of West Virginia. The amount of paperwork and oversight has increased dramatically during the past eight years. This rule will leave us with less time to spend with clients. We do not provide primary medical services; we provide screening and referrals for any medical or psychiatric issues.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

Requiring the medical director to be present 90 percent of the time a clinic is open (§8.4.e.) is cost prohibitive and would be passed on to the clients in the form of higher fees that many could not afford. There are very few doctors willing or able to provide treatment to narcotic-addicted patients. A reasonable alternative to §8.4.e. is §8.5.d. with LPN added to the list. No dose changes are made during the weekends unless there is a medical emergency.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Comment

Some of the duties of the peer review committee in §8.11. are already being monitored by the advisory council. Another committee could focus instead on policy changes and legislative additions.

Response

The Department has reviewed this comment. Existing provisions in the rule address this issue and, therefore, no changes were made.

Comment

Programs should not be required to accept third-party insurance (§9.2.) Waiting for reimbursement would cause an undue burden on programs. An alternative is for the clients to get authorization and submit claims for reimbursement themselves

Response

The Department has reviewed this comment and no changes were made in response. The rule provision is consistent with the requirements of the statute.

Comment

The physical and biopsychosocial assessment schedule is an undue burden of paperwork and time (§§25.4. and 28.1.) We do these at intake and annually; nurses assess clients when they receive their dose and counselors assess during each session. Both add to the progress notes and treatment planning process. We have been working in this field for more than 30 years.

Response

The Department has reviewed this comment and finds clarification is needed, therefore, some changes were made.

Lawson, Kathy M

From: Raymona Kinneberg <raymona@bjcinc.com>
Sent: Friday, July 22, 2016 8:20 AM
To: Lawson, Kathy M
Cc: Pagliaro, Melanie A
Subject: RE: Medication-Assisted Treatment Rules
Attachments: MAT Rule D9-JYW-07 2016 SOS filed office Acadia comments.docx, MAT Rule D9-JYW-07 2016 SOS filed OTP Acadia comments.docx

Kathy -

As discussed, attached are substantive comments from Acadia Healthcare on both MAT proposed regulations. Can we set a time to discuss next week?

I appreciated the call yesterday.

Raymona

Raymona Kinneberg

Vice President

Bill J Crouch & Associates, Inc.
 210 MacCorkle Ave SE
 Charleston, WV 25314

office: (304) 343-3091
 fax: (304) 343-3082



From: Lawson, Kathy M [mailto:Kathy.M.Lawson@wv.gov]
Sent: Friday, July 08, 2016 4:39 PM
To: Bob Musick <bmusick@psimedinc.com>; Brian Mosley <brianmosleymlpc@gmail.com>; C. Sullivan <csullivan@hsc.wvu.edu>; Chris Marr <chrismarr@suddenlink.net>; Frank Hartman <frank@hartmanmullins.com>; Garcia, Joseph D <Joseph.D.Garcia@wv.gov>; Jerome D. Massenburg, M.D. <sandstorm.kay2000@gmail.com>; Jerome Massenburg, MD <jamassenburg@gmail.com>; Marc Spelar <MSpelarMD@hotmail.com>; Marcie Reed <marciereed10@aol.com>; Megan Roskovensky <mroskovensky@wvrealc.com>; P. Bradley Hall, M.D. <bhallmd@wymphp.org>; Paul Cowsar <pcowsar@comcast.net>; Philip Reale <preale@wvrealc.com>; Ralph Smith <rss@ralphsmithmd.com>; Raymona Kinneberg <raymona@bjcinc.com>; Rosemary L. Smith <rsmithpsyd@suddenlinkmail.com>; Scott Cosco <scott@hartmanmullins.com>; Stacey Shy <OVPCEO@gmail.com>; Susan Baek <susan@wvsmo.org>; Terry Rusin <trusin@psimedinc.com>; Tom Susman <tomsusman@tsgsolution.com>; Beane, Cynthia E (BMS) <Cynthia.E.Beane@wv.gov>; Becker, James B <James.B.Becker@wv.gov>; Clifton, Harold D <Harold.D.Clifton@wv.gov>; Cooper, James A <James.A.Cooper@wv.gov>; Cunningham, Vicki M <Vicki.M.Cunningham@wv.gov>; Hicks, William B <William.B.Hicks@wv.gov>; Jones, Victoria L <Victoria.L.Jones@wv.gov>; Lawson, Kathy M <Kathy.M.Lawson@wv.gov>; Lee, Sheila R <Sheila.R.Lee@wv.gov>; Marra, Jolynn <Jolynn.Marra@wv.gov>; Pagliaro, Melanie A <Melanie.A.Pagliaro@wv.gov>; Parsons, Cynthia A <Cynthia.A.Parsons@wv.gov>; Robertson, April L <April.L.Robertson@wv.gov>; Rutherford, Jennifer A <Jennifer.A.Rutherford@wv.gov>; Samples, Jeremiah <Jeremiah.Samples@wv.gov>; Sullivan, Nancy J <Nancy.J.Sullivan@wv.gov>; Villanueva-Matkovich, Karen C <Karen.C.Villanueva-Matkovich@wv.gov>; Walsh, Kimberly A <Kimberly.A.Walsh@wv.gov>; Whitmore, Jessica Y <Jessica.Y.Whitmore@wv.gov>

Cc: Bowling, Karen L <Karen.L.Bowling@wv.gov>

Subject: Medication-Assisted Treatment Rules

Good afternoon.

I am sending this notice to make everyone aware that the MAT rules were filed today for public comment. The comment period will extend through **Sunday, August 7th at 4pm.**

Please find below the links to the rules. We have filed two separate rules, one for opioid treatment programs and a second for office-based treatment.

If you have any questions, please let me know.

[69 SCR 11 Opioid Treatment Programs](#)

[69 CSR 12 Office-Based Medication-Assisted Treatment](#)

Thank you.

Kathy Lawson

Inspector General
Department of Health and
Human Resources
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Charleston, West Virginia 25305

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Kathy Lawson

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Comments from Acadia

TITLE 69
LEGISLATIVE RULE
DEPARTMENT OF HEALTH AND HUMAN RESOURCES

SERIES 11
MEDICATION-ASSISTED TREATMENT - OPIOID TREATMENT PROGRAMS

6.1.e. Each licensed opioid treatment program shall designate a medical director unique to that program. The medical director shall practice at the program and be responsible for the operation of the program in accordance with the requirements of this rule. An opioid treatment program may have two co-medical directors.

8.4.e. A medical director shall practice 90 percent of the hours in which the opioid treatment program is operating each week in order to ensure regulatory compliance and carry out those duties specifically assigned to the medical director. An opioid treatment program may designate two co-medical directors.

8.4.f. Within 10 days after the withdrawal or termination of the medical director, the owner or owners of the program shall notify the secretary of the identity of another medical director for the program. During the interim, not to exceed 60 days, another licensed physician shall be present during

Comments from Acadia

all hours of operation and shall assume the duties of the medical director on a temporary basis until such time as a new medical director is identified and begins work at the program. The interim physician may be another owner of the program or a program physician employed by or associated with the program.

8.5.d. During all hours of operation, every opioid treatment program shall have present and on duty at the program at least one of the following actively-licensed health care professionals:

8.5.d.1. Program physician;

8.5.d.2. Physician assistant;

8.5.d.3. Advanced practice registered nurse; or

8.5.d.4. Registered nurse.

9.2.b. Prior to directly billing a patient for any opioid treatment, a opioid treatment program must receive either a rejection of prior authorization, or rejection of a submitted claim or a written denial from a patient's insurer or West Virginia Medicaid denying coverage for such treatment.

17.10. Prescriptions for medication-assisted treatment medications shall include full identifying information for the patient, including full name and physical address; diagnosis code for which the medication is being prescribed; drug name, strength, dosage form, quantity and directions for use; the MAT program's license number; and the prescribing program physician's regular DEA number and DATA 2000 identification number, if applicable.

18.4.c.2. Upon call-back, a patient shall report to the program within 24 hours of notification, with all take-home medications. The quantity and integrity of packaging shall be verified for all doses. If a take-home dose shows evidence of tampering, the program shall impose uniform sanctions for violating take-home policies, including sanctions for a patient's tampering with a take-home dose, if applicable.

Comments from Acadia

20.7.e. All physical and biopsychosocial assessments completed every 90 days;

21.10. A patient enrolled in a MAT program shall not be permitted to obtain treatment in any other MAT program except in exceptional circumstances and only as provided in section 30.14 of these rules.

25.4. Each patient accepted for treatment at a MAT program shall be assessed including physical and biopsychosocial assessments initially and at least every 90 days following the initial assessment by qualified personnel who shall determine the most appropriate combination of recovery-oriented services and treatment for the patient.

27.2.d. A program physician or supervised physician extender shall perform a physical assessment of a patient on the same day that the program physician initially prescribes, dispenses or administers a medication-assisted treatment medication to a patient. If the patient continues to be treated for substance use disorder at the program, a physical assessment shall be performed at least every 90 days thereafter. All assessments shall be performed according to accepted and prevailing standards for medical care.

RECEIVED

Inspector General



BECKLEY PSYCHIATRIC SERVICES

DR HASSAN A JAFARY, MD

330 N. EISENHOWER DRIVE, BECKLEY, WV, 25801

TEL: (304) 929 0786 FAX: (304) 929 2278

07/20/2016

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of Inspector General
State Capitol Complex, Building 6, Room 817-B
Charleston, WV, 25305

Re: Medication-Assisted Treatment – Opioid Treatment Programs Rule 69-11

In response to Rule 69-11, Medication-Assisted Treatment – Opioid Treatment Program that were filed on 07/08/2016, please refer to the following comments.

I am currently a buprenorphine provider in the Beckley, WV area. After reading the rules and regulations that are to be implemented into the program it seems absurd, unethical and impossible for anyone to do this. Instead of lawyers making these rules and having no medical knowledge and the impact it will have on a lot of communities, there should have been input from practicing programs.

Do you even know the impact it will have when providers from buprenorphine stop prescribing this drug for addiction patients? You think crime and drug abuse will disappear or levels will drop when you implement this treatment plan? Unfortunately if very few physicians will prescribe buprenorphine you will see an up-rise in drug abuse, overdose and crime.

This program was run by mostly a small set of self-employed physicians, who cannot afford to invest in this huge requirement. Financially and man power-wise, it is impossible. Most clinics are not like the "Hope Clinic" run by rich companies. They are individually owned.

In Southern West Virginia, we have six individual providers who are practicing – 600 pts. Our range is from Raleigh, Wyoming, Mcdowell, Boone, Mercer, Summers, Greenbrier, Fayette and Nicholas counties coming to Beckley WV for their treatment.

These people will not be able to get any more service here if this legislature passes, we have no choice but to close our service in the coming month.

If it was your intention to shut down the buprenorphine programs, congratulations you have succeeded and done a good job to mess up the lives of people who really need help. Wait for the mayhem to start, you will have ruined the lives of a lot of people and their families.

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

The regulations as proposed, seriously jeopardizes treatment of patients currently enrolled in programs or wishing to enter programs.

You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed:

Charlie McMillian SR

Tel:

304-68248-17

Address:

Bob 175 Glen Beach

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

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Signed: Neville McMillan Jr.

Tel: 304-642-6368

Address: PO Box 243

25845 Glen Park

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
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Signed: Captain YMC McKeon

Tel: 504-682-8833

Address: P.O. Box 125 Allen Fork

25645

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Timothy Jester

Tel: 412-423-7036

Address: 46 Fleming Lane

Martinsburg WV 25108

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Ronan Crow

Tel: 304-423-7036

Address: 46 Fleming Ln

Wharton, WV 25208

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Brandon Spewer

Tel: 304-682-4817

Address: P.O. Box 175

Glen Fork WV 25845

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
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CC: Governor of West Virginia

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Signed: Laure M. Lilly

Tel: 304-237-8325

Address: 3126 Flat Top Rd.

Ghent, WV 25843

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Terria Jones

Tel: 304-392-8810 646-1351

Address: 1304 Rockwell Rd

Rupert WV 25984

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Salvatore Baula

Tel: 304-392-8810

Address: 1208 ROCKCRAFT Rd.
Luport, WV 25954

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
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Signed: *Harold A. Longton*

Tel: 304-719-2825

Address: 421 Tennessee Str

MT. Hope WV,

25880

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

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Signed: 572421 7000

Tel: 304-244-2211

Address: PO BOX 391 Bud WV

24716

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

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Signed: John Judd

Tel: 304-664-8513

Address: Po Box 105

Harover WV 24839

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
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Signed: Dee Pennington

Tel: 201-207-6110

Address: 273-S Heber St

Bechtel WV 25801

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
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Signed: Jill R. Davis

Tel: 304.573.7485

Address: 117 Martin St

Daniels, WV 25832

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

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Signed: Anthony Williams

Tel: (304) 763-8688

Address: P.O. Box 555

Coal City, WV 25823

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Michael R. Graham

Tel: 681-207-6872

Address: 114 Dixie Avenue
Beckley WV, 25801

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: David J Young

Tel: (601) 238-5723

Address: 118 Midland St. Beckley

WV 25801

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
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Signed: Cody James Felt

Tel: 304-938-4611

Address: Harwood, WV

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
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Signed: Sally Ferrell

Tel: 304-553-9697

Address: 49 Ambiance Alley
DANON, WV 25817

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

The regulations as proposed, seriously jeopardizes treatment of patients currently enrolled in programs or wishing to enter programs.

You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Tom Mitchell

Tel: 304-591-3174

Address: 1265 Bayfront Drive
Seaside, TN

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Kathryn J. Dempsey

Tel: 304-934-9396

Address: Buck, WV

P.O. Box 400

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Lany Shepherd

681 222 19064
Tel: 304-725-1325

Address: P.O. Box 4

Clear Fork, WV 24832

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed:  _____

Tel: 681-226-4502

Address: 115 Ballerup Road

Dry Creek, WV

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: James Harrison

Tel: 304-646-4879

Address: Cyclone, WV - 24527

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Wendy Cook

Tel: 304-682-3163

Address: 51 Valley Grove
Decatur, WV 24820

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Michelle Williams

Tel: 304-652-0296

Address: 57 Valley Drive
Beckers, WV - 24870

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Bernice Susan Tolson

Tel: 304-939-7096

Address: P.O. Box - 305

Belt, WV.

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Glenn Blankenship

Tel: 304-682-4134 or 533 9627-

Address: 53 Blue Ridge Rd

Cyclone, WV - 24527

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: [Handwritten Signature]

Tel: 504 222 0211

Address: PO Box 911

Pineville WV 24879

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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The regulations as proposed, seriously jeopardizes treatment of patients currently enrolled in programs or wishing to enter programs.

You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Monica Stewart

Tel: 304 682-5571 / 304-894-2801

Address: P.O. Box 224

Medway WV 24860

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: *Angela J. Duvette*

Tel: 304 662 5163

Address: Stein, WV

601 307 6011 241120

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Kelly Vance /

Tel: 304 419-6689

Address: 3317 Parks Branch Rd

Martinsburg, WV 25750

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Lingel Carlson

Tel: 304-228-1886

Address: 707 South oakwood apt 1
Beechey W.V 25801

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Allyson Gandy

Tel: 304-934-7654

Address: PO Box 511

Boonville WV 25817

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Jeffrey De

Tel: 304-673-8779

Address: PO Box 360
Morgantown, WV, 25811

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Alicia Fitzgerald

Tel: 304-992-3137

Address: 327 Washington St
Alderson W.Va 24910

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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The regulations as proposed, seriously jeopardizes treatment of patients currently enrolled in programs or wishing to enter programs.

You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Matthew Lippert

Tel: 304-546-1384

Address: PO Box 307

CHESAPEAKE, WV 25870

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

The regulations as proposed, seriously jeopardizes treatment of patients currently enrolled in programs or wishing to enter programs.

You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Amber Dawson

Tel: 304/676-7576 or 304/666-7679

Address: 107 Gillowick Ln

Rock, W.V. 26040

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Anthony Wabman

Tel: (304) 237-2157

Address: 644 N Mountain Ave.

mt Hope WV 25890

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Stephen Rogers

Tel: 304-719-9099

Address: P.O. Box 266

Fayetteville WV 25840

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Tom J. Lewis

Tel: 304.854-2465

Address: 5151 Clear Fork rd

Arden WV 25208

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Della Stafford

Tel: 804 682-0168

Address: PO Box 21

Lippsville 24801

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: 

Tel: 304-660-6721

Address: RR7 Box 581

Petersburg WV

24763

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Amelia Bishop

Tel: 254 731 9669

Address: 1500 9th St

Charleston, WV

25327

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: *[Handwritten Signature]*

Tel: (304) 574-~~8056~~6472

Address: PO Box 60 Bld

WV 25316

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: John Workman

Tel: 304-932-9091

Address: PO Box 574

Chloe WV 26027

I am a patient and I think its wrong
because I dont want to go back
on the street I want help. and I think
this program is good. so please dont
stop it.
Thank you.

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Teresa Meyer

Tel: 304-923-3674

Address: John St

Cyclone WV

24827

I am a girlfriend of a patient and I think this law is wrong. They need help and your going to make people go back on the streets. instead of getting the help they need.
Thank you.

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Kayla D. [Signature]

Tel: 304-645-6004

Address: 304 [Signature] St.

Charleston, WV

249176

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Sueci McManaway

Tel: 304-673-8574

Address: 217 Bradley Ave

Bradley, WV 25801

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Jessica Adams

Tel: 204) 654-8261

Address: 1000 1st Ave

Charleston WV 25301

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Brandon Rieder

Tel: 304-654-8261

Address: 338 Old New River Road

Corning WV 25517

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: *Christina*

Tel: 304-712-0987

Address: P O BOX 351

Mudway WV 25873

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Carol Bailey

Tel: 304-308-7571

Address: P O Box 247 Athens WV

24712

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

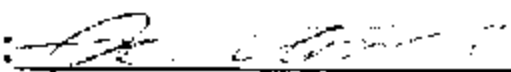
CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: 

Tel: 504 418 7619

Address: ~~000~~ 322 Nancy Ave
Belle WV 25015

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Kenn Williams

Tel: 304-890-9692

Address: 3001 Ray D'Agostino
City Hill WV 26006

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Robert G. Galt

Tel: 505-419-3197

Address: 112 Francis Hill Apt 413
Fayetteville, WV 25840

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: *Michelle S. Felton*

Tel: *504 231-6280*

Address: *PO Box 31*

Keyser, WV

24854

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Marcy Annals

Tel: 336-247-2154

Address: 305 Puck Dr

Lexington - 710 27242

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

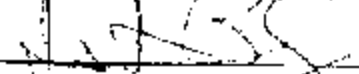
CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: 

Tel: 304-723-0285

Address: PO Box 747

Millersburg WV 25871

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: *Juanita Barber*

Tel: *(304) 675-6336*

Address: *Hullman W.V. 25858*

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Dustin Franklin

Tel: 304-922-8531

Address: 376 Overton Circle

Pinckton WV 24740

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

The regulations as proposed, seriously jeopardizes treatment of patients currently enrolled in programs or wishing to enter programs.

You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Ellen Magen

Tel: (304) 673-5118

Address: 109 Peckham Dr

Ellen Magen WV 25813

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: *Jeanne M. ...*

Tel: *304-267-3710*

Address: *97 7th St*

Essex WV
25801

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Alicia Bellamy

Tel: (304) 660 7837

Address: 716 Winchester Farm Rd
Greenville, WV 24945

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

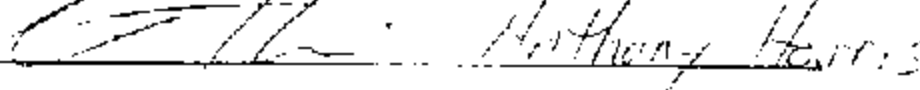
CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed:  Anthony Harris

Tel: 304-237-5010

Address: 108 Beckersville dr
Beckley WV 25801

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Ch. [Signature]

Tel: ~~(304) 253-5555~~

Address: 608 Stewart Rd.
Becky, WV 25801

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Jeremy Small

Tel: 304-448 3176

Address: PO Box 265

Conroy WV 24836

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: James Burdette

Tel: 281-323-0436

Address: PO Box 157 Crowley

WV 24431

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: _____

Tel: _____

Address: _____

PC box 453
Lewisburg, WV 24901

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Bobby A. Bly, Jr.

Tel: 304 854 0276

Address: PO Box 29

Moan, Wv 25146

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

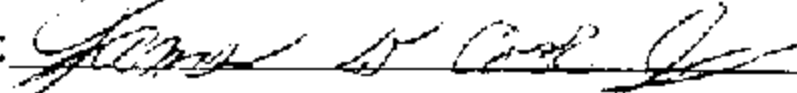
CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: 

Tel: 304-854-1720

Address: Naoma WV

PO BOX 203

Naoma WV 25140

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Amystine Martin

Tel: 304-520-5913

Address: 7496 Radwals Valley Rd.
Williamsburg, WV 24991

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Kyle M. Ross

Tel: 304-923-8459

Address: 166 Cotton Street

Beckley, WV
25301

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: *B. B.*

Tel: 681 231-3272

Address: 205 Spruance St

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: William Seth Boggs

Tel: 301 - 250 - 8744

Address: 157 O'DELL FARM

LANE CARK HILL

25901

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed:

Yimox Sigler

Tel:

304-763-7573

Address:

142 Joe Cooper fm.

Rd White Oak, WV

25989

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Jamel Cook

Tel: (304) 222-7644

Address: P.O. Box 645

Glen Dale, WV

25844

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Honorable Chad Sturgeon

Tel: 304-683-6466

Address: 4109 ODD Road

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Robert D. Murray

Tel: (304) 712-6926

Address: 207 Hurley ave

Beckley, WV

25501

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Jessica Bailey

Tel: 504-673-1961

Address: P.O. Box 356

Bendy WA 98801

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Wanda Bailey

Tel: 681-222-4159

Address: 902 Brass Rd

Shady Springs WV 25918

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Barbara L. Luster

Tel: 304-322-4133 / 631-4111 319

Address: PO Box 157

Arnett, WV 25007

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Jonella Hunt

Tel: 304-228-9296

Address: PO Box 461

Quinn Wood, WV 25981

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: _____

Tel: _____

Address: _____

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed:  _____

Tel: 304 578 3253

Address: PO Box 4169

Martinsburg, WV 25878

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: CHRISTOPHER W. WELLS

Tel: 304-400-5015

Address: 633 HAWKWOOD RD

MOORE, WV 26041

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Jennie Westberry

Tel: 352-287-2851

Address: PO Box 422 Coal

City, WV 25823

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Anthony Jackson

Tel: 304-890-0482

Address: PO Box 422

Coal City WV 25823

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: [Handwritten Signature]

Tel: 304-763-4693

Address: 100 [Handwritten Address]

[Handwritten Address]

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Theresa M. Anderson

Tel: 304-457-4486

Address: 100 Church Lane

2028 S.W. Charleston, WV

25305

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: James Stewart

Tel: 304-514-7832

Address: 1611 17th Street

MT Marlinton, WV 26078

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Christina [Signature]

Tel: (304) 528-5786

Address: 112 Bush Rd.

@@ [Signature] WV 24701

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed:

Debra Hammon

Tel:

(304) 383-2947-304-888 1334

Address:

HC 31 Box 3925

Stygusty WV 24861

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Ann M Wood

Tel: 304-742-5099

Address: 150 Navajo st
Charleston WV 25305

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Michael C. [Signature]

Tel: (304) 368-1575

Address: 978 Ninth St

Beckley, WV 25301

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

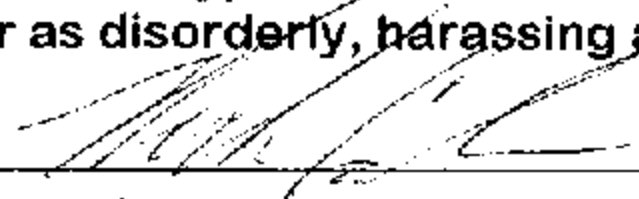
CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed:  _____

Tel: (304) 847-5016 _____

Address: 512 Daniel Street _____

Welster Springs, WV 26288 _____

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Michael R. Haley

Tel: 304-~~866~~ 8094476

Address: 291 Delaware Lane
Pinecroft WV 24740

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: *Patricia Smith*

Tel: *304 578 4705*

Address: *520 Raleigh Ridge Rd*

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: James H. [Signature]

Tel: (513) 222-1033

Address: 545 [Address]

[Address]

[Address]

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: [Handwritten Signature]

Tel: 304-587-2989

Address: 812 Union View Rd

Charleston WV 25305

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Cecily Thompson

Tel: 304-589-2485

Address: 102 Pleasant Rd

Charleston, WV 25305

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Amanda J Price

Tel: (304) 578-9089

Address: PO Box 323

Mullens, WV 25882

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed:  _____

Tel: _____

Address: _____

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305


CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

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Signed: 

Tel: 540-599-0088

Address: _____

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Alison [Signature]

Tel: 938 4500

Address: PO Box 624

Roanoke WV 24871

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Elanett Faurer

Tel: 304 520-2262

Address: 327 Washington St.
Alderson, WV, 24910

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Brandee York

Tel: 304-553 9190

Address: Box 197 Marlinton, WV

25606

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Betty Hearon

Tel: 704-583-9190

Address: Box 52

41602 Oakbank
25666

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Carol Rumberg *h*

Tel: 304-239-4392

Address: PO Box 326

Matheny, WV 24360

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Christy Knight

Tel: 491-119-7911

Address: 436 Lincoln St

Charleston WV

25327

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: *Yonetta Jordan*

Tel: 609 938 2841

HC 63
Address: PO Box 232 Panther

24672

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Leahy Keach

Tel: 304 732 8528

Address: PO Box

Rockwell WV 24850

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Chris Redden

Tel: 304-222-8399

Address: 100 Lane Ave,

Mabscott WV

25871

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Angie E. Hurd Gary H. Hurd

Tel: 304-579-0127

Address: P.O. Box 261

Sophia WV

25921

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Shawn Harbo

Tel: 304 252-6357

Address: PO Box 49 Cabotown WV

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: *Laura Cochran*

Tel: *304-890-9692*

Address: *HC 67 Box 1023*

Clearfork WV, 24822

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Donald Justice

Tel: 601-222-9263 OR 601-368-0585

Address: 100 EIKINS COURT Apt-D1

ROCKWELL WV 24870

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Jackie Shaw

Tel: (304) 992-4453

Address: 1517 Leamy Mt Rd

Gandy Meadows WV 24910

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Lara J. Ayers

Tel: 304-222-6445

Address: 175 Circle Tree Dr
Beckley WV 25801

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: _____

Tel: 800.787.4370

Address: PO Box 599

Coal City WV 25823

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: John Kocik - Terence Kocik

Tel: 304-652-3371

Address: Po Box 125

Jepp, WV, 24849

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Jesse Hulse

Tel: (304) 308-0804

Address: 324 Elmwood School

Rd.

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Kelly Dubrow

Tel: 304-682-3000

Address: PO Box 1921

Deer Park WV 24870

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: [Handwritten Signature]

Tel: [Handwritten Phone Number]

Address: [Handwritten Address]

[Handwritten Address]

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: *Amanda Jewell*

Tel: *681 235 1816*

Address: *P.O. Box 1385*

Putnam Co WV 26157

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Denise Blake

Tel: 304.251.7037

Address: PO Box 111

Beckley WV, 25813

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Christy Latta

Tel: 681-368-8973

Address: 1230A 25 Parkville
120 94841

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: MELICK LAWSON

Tel: 304 732-7062 cell 304 840-2

Address: 1478 APPALACHIAN HWY

PO BOX 55 PIPERVILLE

24874

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Chubert Davis

Tel: 304 316 4989

Address: PO BOX 103

Dunbar, WV 26034

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Shirley S. Muncy

Tel: 304-719-7944

Address: 100 Atkins Ave

A 5 Oceano, CA 92070

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Richard Jones

Tel: 304-682-3116

Address: P.O. Box 1483

CREATK WVA 25870

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: *Schmuck / Frank*

Tel: 504-719-3086

Address: PO Box 311

Seaside, WV

25077

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Cassie McKenney

Tel: 304-860-0910

Address: 1224 Mount Hope Ave
4711 Hope, WV 25850

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Alisa G. [Signature]

Tel: 304 590 5863

Address: 239 Laramie Ave

Boakley WV 25801

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Marianne Jones

Tel: 606 338 3541

Address: 100 E. 12th St. Apt.

606 Charleston, WV 25310

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: *Mel. [unclear]*

Tel: *304.763.8194*

Address: *PO Box 694 mabscott*

WV 25821

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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Signed: Robert Hall Sr.

Tel: 304-623-3034

Address: _____

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: _____

Tel: 364-392-2053

Address: 598 Harrison Road

Clintonsville WV 24731

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Allen Joe Peewee

Tel: 304-946-5081

Address: 1620 Sandy gas road
Cyclone WV 24827

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Sara Sherman

Tel: 681-238-8834

Address: P.O. Box 203

Harper WV, 25851

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: _____

Tel: _____

Address: _____

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Christina Mackenzie

Tel: 304-887-2717

Address: 911 Hickory St.

Princeton, WV 25740

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Cecilia Stewart

Tel: 304 651-0589

Address: 15 Mountaineer Lane

Fullerton WV 26038

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: *Arnold P. Conroy*

Tel: *304 5754199*

Address: *6240 Robinson St Clarks Summit, W.V. 25865*

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Brandon J. Spivey

Tel: 304-652-4517

Address: 224 Temple St
Glen Fork WV 25845

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: La Shonda Richmond

Tel: 304-732-9303

Address: 2553 Appalachian Hwy
Pineville, W.V 24874

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

The current proposed regulations for Office-Based Medication Assisted Treatment programs are overly cumbersome on individual providers currently providing services to citizens in the State of WV.

The regulations as proposed, seriously jeopardizes treatment of patients currently enrolled in programs or wishing to enter programs.

You are seriously jeopardizing my medication assisted treatment healthcare.

This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Charles Evans

Tel: 304-237-5780

Address: ~~213~~ 213 Race Track Rd

Mt. Hope WV 25880

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Wylb. Thomas

Tel: 304-661-3022

Address: 863 Cold Knob Rd

Williamstown WV

24991

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: 11/24/2014 [Signature]

Tel: 606-364-3640

Address: 144 Crest St

Buckley, WV, 25801

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: *Ryan E. Howard*

Tel: 304-640-3397

Address: 6476 Satewood Rd

Waynesville NC WV

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: *[Handwritten Signature]*

Tel: *(304) 251-9116*

Address: *11 Jackson Hill Rd*

P.O. Box 100 25305

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Amy Mullins

Tel: 304 800 3096

Address: P.O. Box 162

Mullins WV

25305

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Timothy Blalock

Tel: 304-423-7281

Address: 1006 Johnson Ave

Martinsburg, WV 25837

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: CHRIS HOFF

Tel: 606 3203

Address: 100 E 10th St & Highway 107

D-3 (C) 107 245 10

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: July Jones

Tel: 304-966-9335

Address: 1491 Bramwell Hill

Bramwell Hill 25417/5

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: *M. K. Lawson*

Tel: 304-547-5435

Address: 1010 Kanawha Blvd. E.

Charleston, WV 25305

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: 

Tel: (304) 682-5734 923-3237

Address: 124 Cooperside Rd

Cyclone WV 24827

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Jennifer Jordan

Tel: (304) 237-2646

Address: PO Box 599

Coal City WV 25823

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Don Duvick

Tel: 304 723 0469

Address: 1440 East Main
St Dept 3 R5741

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Jessica Smith

Tel: (304) 237-4407

Address: Box 786 Coal City
WV 25823

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Kenneth Anderson

Tel: 304-923-6586

Address: P.O. Box 303

Montcalm - WV - 24737

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Clarence A. Givens

Tel: (304) 683-3605

Address: Box 314 Rhoadell

W.V. 25915

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: 

Tel: 681-220-7245

Address: 107 Main St
The Frontier, WV
25305

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Raymond M. M. M.

Tel: 934 5800 894-7634

Address: PO Box 128

Latonia WV 25607

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Jessi M. Shumate

Tel: 304-436-3948

Address: PO Box 179

Premier, WV 24878

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

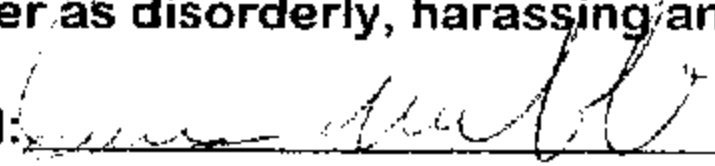
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Signed: 

Tel: 681-220-4433

Address: P.O. Box 128

ARWETT WV 25007

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Thomas J. Williams

Tel: 304-387-2137

Address: 605 K Jones Place

Princeton, WV 24739

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Richard M. Sims

Tel: 304-506-6348

Address: PO Box 413 Glen

Roanoke WV 25844

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: *M. Marshall*

Tel: *681-368-9209*

Address: *PO BOX 438*

Midway WV

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: *Emily Riley West*

Tel: *604 323-0373*

Address: *103rd St*

Prab, Guadalupe, WV

253827

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Katherine C. Giff

Tel: 804 723-0137

Address: PO Box 333

1101, Orchard Way

Charleston WV 25307

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: *Howell Collins*

Tel: 304-687-6942

Address: P O Box 540 New
market

WV 26047

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Misty Osborne

Tel: 304-651-205-9316

Address: PO Box 767

Cyclone WV, 24827

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: *Christine A. White*

Tel: *(304) 632-6943*

Address: *P.O. Box 5109*

Marietta, WV 25635

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Amy Stewart

Tel: (304) 1854-0477

Address: P.O. Box 13

Dry Creek WV

25062

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: Franklin Shumate

Tel: 304-436-5948

Address: PO Box 179

Premier WV 24878

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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Signed: *Gene Cochran*

Tel: *304-290-9692*

Address: *HC 67 Box 1023*

Charleston WV, 25302

To: M. Katherine Lawson, Inspector General
WV DHHR, Office of the Inspector General
State Capitol Complex
Building 6, Room 817-B,
Charleston, WV, 25305

CC: Governor of West Virginia

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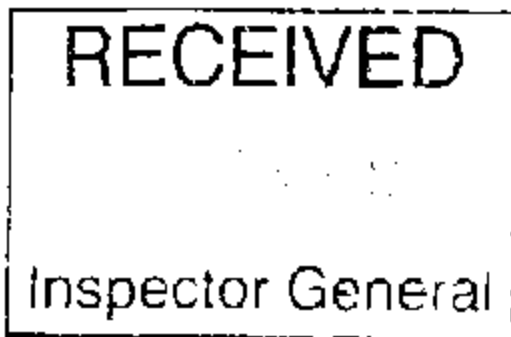
This law stereotypes individuals suffering from opioid dependence disorder as disorderly, harassing and unlawful. (ie. community relations).

Signed: Deann Voiers

Tel: 7-10-29-3438

Address: 151 PO Box 12

Spadan WV 25818



MARTINSBURG INSTITUTE



07/25/16

WVDHHR, Office of Inspector General
State Capitol Complex
Building 6, Room 817-B
Charleston, WV 25305

Attention: M. Katherine Lawson
Inspector General

Dear Ms. Lawson:

Thank you for giving the Martinsburg Institute an opportunity to comment on the proposed legislation for Medication-Assisted Treatment-Opioid Treatment Programs 69 CSR-11. We have concerns regarding parts of the legislative rule, and how it would affect our ability to provide service in the State of West Virginia.

Since 2002, all Methadone Clinics have been mandated by the Federal Government to be accredited by approved organizations (CARF, JCAHO etc). We comply with over 1800 standards, the same standards that hospitals use. We are also licensed by the DEA, SAMSHA, as well as the State of West Virginia. The amount of oversight and paperwork has increased dramatically over the past 8 years. This rule has mandated much more, leaving less time to spend with clients in clinical practice.

Please remember that we do not provide primary medical services. We are an Opioid Treatment Program that provides screening and referrals for any medical or psychiatric issues a client may have. We provide individual and group counseling, crisis intervention, assessments, and methadone treatment for narcotic addiction. Our Medical Director is responsible for all of the dose changes, which are approved and signed by her. Any take home doses are approved or denied by our Medical Director.

Our doctor assesses each client for the degree of narcotic dependence, screens for any major health issues that would deem a client ineligible for methadone treatment, and recommends follow-up on mental health or other medical issues.

Legislative Rule 8.4e states that the Medical Director should be present 90% of the time a clinic is open. Programs are staffed with Professional Counselors, RNs, LPNs and Administrators. It is unnecessary to have the Medical Director on premises 90% of the time. The cost alone would be prohibitive, and there is not nearly enough work to

warrant the doctor being on site for that much time. The additional cost would have to be passed onto the clients, making their daily fees higher. Many of the clients would not be able to afford treatment.

There are very few doctors willing or able in West Virginia to provide treatment to narcotic addicted patients. We have looked for years for additional doctor support and have had no success in hiring. We are a substance abuse treatment program, not a medical clinic.

The Martinsburg Institute suggests removing 8.4c from the regulations, using 8.5d as a reasonable alternative and adding LPN to the list. On weekends, there is often a skeleton crew working and one nurse medicating the clients. No changes in doses are made unless there is a medical emergency. LPN's are more than capable and acting within their scope of practice to dispense medication to clients.

Legislative rule 8.11 Peer Review Committee.

Some of the duties of the peer review committee, with the exception of file reviews, are being monitored by the Advisory Council.

Client charts are reviewed by the physician at intake, earning or removing take home privileges, for any medical concerns and other times throughout the course of treatment. They are also reviewed, at least quarterly, by the clinical supervisor. If an additional committee is needed perhaps it could just focus on policy changes and legislative additions.

Legislative Rule 9.2a, 9.2b, 9.2c, 9.2d

Programs should not be required to accept third party insurances. Many private insurance companies do not reimburse for medicated assisted treatment or only reimburse a small portion of billed services. Waiting for reimbursement after services have been provided would cause an undue burden on programs to meet payroll and normal operating expenses. An alternative for the client is to get authorization from his/her insurance provider and submit claims for reimbursement to them directly.

Legislative rule 25.4 & 28.1 requires physical and biopsychosocial assessments 30 days after admission and every 90 days. This creates an undo burden of paperwork and time. Clients receive a complete physical and biopsychosocial evaluation at intake. Physical evaluations are then completed on an annual basis.

Clients are assessed by nurses each time that they receive their dose and by counselors during every counseling session. The results of these assessments are noted in either medical or counseling progress notes. In addition, the treatment planning process assesses the client's progress toward goals and objectives. These plans continually have input and follow-up by the client, counseling and medical staff.

We believe that you are not aware of the negative impact this rule will have on clinics throughout the state and ask for your support and understanding. Both of the owners of the Martinsburg Institute have been working in the field for over 30 years.

If we can be of any assistance in clarifying how Opioid treatment programs work please feel free to contact us.

Sincerely,



Neal Berch
President



Ellen Valli
Vice President

Lawson, Kathy M

From: Raymona Kinneberg <raymona@bjcinc.com>
Sent: Friday, July 22, 2016 8:23 AM
To: Lawson, Kathy M
Cc: Pagliaro, Melanie A
Subject: RE: Medication-Assisted Treatment Rules
Attachments: MAT Rule D9-JYW-07 2016 SOS filed office technical.docx; MAT Rule D9-JYW-07 2016 SOS filed OTP technical comments.docx

Kathy –

Here are the “technical” comments I mentioned on each rule.

Raymona

From: Lawson, Kathy M [mailto:Kathy.M.Lawson@wv.gov]
Sent: Friday, July 08, 2016 4:39 PM
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Cc: Bowling, Karen L <Karen.L.Bowling@wv.gov>
Subject: Medication-Assisted Treatment Rules

Good afternoon.

I am sending this notice to make everyone aware that the MAT rules were filed today for public comment. The comment period will extend through **Sunday, August 7th at 4pm.**

Please find below the links to the rules. We have filed two separate rules, one for opioid treatment programs and a second for office-based treatment.

If you have any questions, please let me know.

69 SCR 11 Opioid Treatment Programs

69 CSR 12 Office-Based Medication-Assisted Treatment

Thank you.

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Minor Proofing Comments

TITLE 69
LEGISLATIVE RULE
DEPARTMENT OF HEALTH AND HUMAN RESOURCES

SERIES 11
MEDICATION-ASSISTED TREATMENT - OPIOID TREATMENT PROGRAMS

2.41. Opioid Drug -- Any substance or drug having an addiction-forming or addiction-sustaining liability similar to morphine or being capable of conversion into a drug or substance having such addiction-forming or addiction-sustaining liability including, but not limited to, heroin, morphine, codeine, Oxycontin, oxycodone and other medications that block the transmission of pain messages to the brain.

2.47. Physician Extender -- A medical staff person other than a program physician, functioning within his or her scope of practice to provide medical services to patients admitted to MAT programs. Physician extenders approved for employment at a MAT program include advance practice registered nurses or physician assistants. Registered nurses and licensed practical nurses are not authorized to act as physician extenders in a MAT program, although they may work within the program in other capacities.

5.1. Hospitals that are licensed under "Hospital Licensure," 64 C.S.R § 12, and behavioral health facilities that are licensed under "Behavioral Health Centers Licensure," 64 C.S.R. § 11, and which provide medication-assisted treatment as defined in W. Va. Code § 16-5Y-2 are subject to the provisions of this rule and to all other relevant federal and state licensing requirements as specified by the secretary.

5.3. Crisis Stabilization Units (CSU) are not required to obtain a state license if the following conditions are met:

5.3.a. Treatment at the CSU is for no more than 7 days; and

5.3.b. The CSU must document the referral of the patient to an appropriate MAT program upon discharge from the CSU.

Minor Proofing Comments

21.10. A patient enrolled in a MAT program shall not be permitted to obtain treatment in any other MAT program except in exceptional circumstances and only as provided in section 30.14 of these rules.

30.14. Guest dosing at a nearby program is preferred whenever possible and shall be documented in the patient's chart and individualized treatment plan of care. Each MAT program shall develop and implement policies and procedures that address the transfer of patients from one MAT program to another.