

WV Department of Health and Human Resources
Office of Communications
One Davis Square, Suite 100 East
Charleston, WV 25301

Dear Secretary Crouch,

Regarding Legislative Rule 69-12, section 16-5y-6(c) and the requirement that a Medication-assisted treatment program (MAT) be located farther than one-half mile from a licensed day care center or a K-12 school, please accept this letter requesting a waiver from that restriction for the **YOUR ORGANIZATION'S MAT PROGRAM**. **YOUR ORGANIZATION** houses a medication-assisted treatment program that provides services for **XX** patients and is waived for up to 100 patients. The program and is within one half mile of a day care center and / or school.

According to The Office of Epidemiology and Prevention Services (**OEPS**) within the Bureau for Public Health there were 631 heroin-related deaths between 2011-2015 in Cabell, Kanawha and Berkeley counties, representing 47% of the total opioid deaths in West Virginia during those years. This was a 78% increase from the previous 10 years for those same counties. The West Virginia Health Statistics Center reports that between the years of 2012 to 2016, there were **423 overdose deaths in Kanawha County alone**. **Use your county data.**

The MAT program existed prior to the passage of 69-12 and serves Kanawha County and the surrounding area. **YOUR** County, like all of the State, struggles with a lack of service providers who deliver treatment to citizens battling an opioid addiction. Were the MAT program forced to close, **XX** citizens now working diligently to overcome their disease of opioid addiction, as well as those awaiting treatment, would lose their treatment services and would be at great risk of returning to active opioid addiction.

Our medication-assisted treatment patients report to the MAT Clinic and then gather in the group room in the clinic prior to the start of the weekly treatment program. These patients are indistinguishable from the other patients - none of whom mill around outside the facility or move around the neighborhood. The MAT patients do not comingle with the neighborhood children. The area children are never in any danger from any Clinic patient, including those recovering from the disease of addiction. While the suggestion that our patients in recovery from the disease of addiction pose a risk to children is repugnant and prejudicial, it is for our current **XX** recovering people, as well as those to follow, that I am requesting this prohibition of proximity to children be waived. We at the Cabin Creek Health Center Medication-Assisted Treatment program await your response.

Sincerely,

Dr. Jekyll, Medical Director

YOUR ORGANIZATION