

February 2, 2016

To Whom it May Concern;

I have attended several meetings that have taken place at the Kane County Zoning Appeal Board in the past many months. There seems to be some misunderstanding of what staffing patterns and expertise are available in a highly specialized setting such as a detoxification unit. I would like to submit this letter to you so the Kane County Zoning Board of Appeals and the community may have the best and most recent information available.

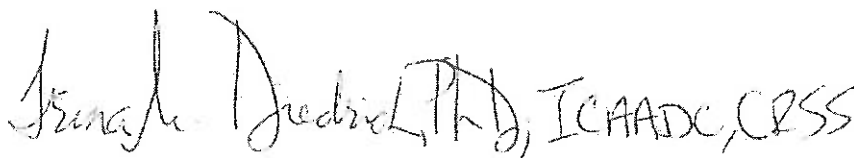
Staff working within a substance abuse treatment center where residential detoxification services are being provided are highly qualified and specialize in providing exceptionally skilled medical supervision to patients during the withdrawal phase of their treatment. The medical staff is on the unit 24 hours a day, seven days a week. This level of expertise is not negotiable and is a condition of licensure for every residential treatment center in Illinois.

In the State of Illinois there are 24 licensed detoxification units providing services in 20 free standing treatment centers. Several organizations have multiple licenses for services, which are required by the State of Illinois. Each organization must have a separate license for each detoxification unit.

In contrast there are considerably less detoxification treatment available within a hospital setting. While inpatient beds are available, most of the hospital services are provided in an outpatient setting and the number of residential beds varies widely, including detoxification beds. The type of beds available is at the discretion of the hospital and highly specialized detoxification beds are not widely available.

I hope this information is helpful to you and to the Kane County Zoning Board of Appeals. Please contact me with additional comments, questions or concerns.

Sincerely,



Trina M. Diedrich, Ph.D., ICAADC, CRSS
Independent Consultant
217.836.1916
diedrichtrina@aol.com

J-25

Section 2060.309 (Professional Staff Qualifications)

- c) In any medically managed or monitored detoxification service at least one staff, 24 hours a day, shall:
 - 1) be a **registered nurse** pursuant to Section 3(k) of the Illinois Nursing and Advanced Practice Nursing Act of 1987 [225 ILCS 65/3(k)];
 - 2) be a **licensed practical nurse** pursuant to Section 3(i) of the Illinois Nursing and Advanced Practice Nursing Act of 1987 [225 ILCS 65/3(i)] who has completed at least 40 clock hours of formal training in the field of alcoholism or other substance abuse; or
 - 3) be a certified **emergency medical technician** pursuant to Section 4.12 of the Emergency Medical Services (EMS) Systems Act [210 ILCS 50/4.12] who has completed at least 40 clock hours of formal training in the field of alcoholism or other substance abuse.

Section 2060.405 Detoxification

The medical director, as referenced in Section 2060.413 of this Part, shall develop protocols and authorize procedures for the **medical supervision of and the staffing pattern for any patient receiving ambulatory or clinically managed residential detoxification** as specified in the ASAM Patient Placement Criteria. All other **detoxification shall be medically monitored or managed by a physician** according the specifications contained in the ASAM Patient Placement Criteria and as follows:

- a) **Medically Monitored (Level III.7-D)**
Medically monitored detoxification is for adults and adolescents. **At least two staff persons shall provide 24 hour observation**, monitoring and treatment, one of whom shall meet the staff qualifications specified in Section 2060.309(c) of this Part.
- b) **Medically Managed (Level IV-D)**
Medically managed detoxification is for adults and adolescents. However, medically managed opioid maintenance therapy shall only be used for adolescents age 16 and 17. **At least two staff persons shall provide 24 hour observation, monitoring and treatment, one of whom shall meet the staff qualifications specified in Section 2060.309(c) of this Part. Medically managed detoxification also requires that a physician see the patient daily.**

(Source: Amended at 25 Ill. Reg. 11063, effective August 14, 2001)