

**CITY OF TACOMA LEGISLATIVE AUTHORITY COMMENTS FOR
OPIATE SUBSTITUTION TREATMENT PROGRAM CERTIFICATION**

**Division of Behavioral Health and Recovery
Olympia, Washington**

The Division of Behavioral Health and Recovery (DBHR) has received an application for DBHR certification of a new opiate substitution treatment program (OTP) described in Part B below. DBHR will conduct a review of the proposed OTP applications as specified in Revised Code of Washington (RCW) 71.24.590 and Washington Administrative Code (WAC) 388-877.

When making a decision on an application for certification of an OTP, (RCW) 71.24.590 (1)(a) states that DBHR will consult with the county legislative authorities in the area in which an applicant proposes to locate a OTP program and the city legislative authority in any city in which an applicant proposes to locate a OTP program.

Please complete **PARTS A and C** of this City/County Legislative Authority comment form within 14 days receipt and return the form to DBHR with any additional supporting documents.

If you have any questions about the process or procedures used by DBHR to approve an OTP application, please contact Jodi Taylor, DBHR Certification Policy Manager at (360) 725-1456, or email at Jodi.Taylor@dshs.wa.gov.

PART A – CITY/COUNTY LEGISLATIVE AUTHORITY (PLEASE COMPLETE THIS PORTION)

1. Name of County/City Legislative Authority Completing Form

City Council of the City of Tacoma

2. Department Name

Office of the Mayor

3. Street Address City State Zip Code

Tacoma Municipal Building, 12th Floor
747 Market Street, Tacoma, WA 98402

4. Mailing Address (If different than above) City State Zip Code

Same

5. Name of Contact Person Authorized By County/City

Mayor Victoria Woodards
Tacoma Municipal Building, 12th Floor
747 Market Street, Tacoma, WA 98402

Title Authority For DBHR Consultation (If different than above)

Same

6. Telephone Number (Include area code)

(253) 594-7848

7. Fax Number (Include area code)

(253) 591-5123

8. E-Mail Address

dmscott@cityoftacoma.org

PART B – DESCRIPTION OF OTP APPLICATION (THIS PORTION IS COMPLETED BY DBHR)

1. Name of Proposed OTP: Northwest Integrated Health- Tacoma OTP

2. OTP Proposed Street Address: 3727 South Tacoma Way, Tacoma, Washington 98409

3. County of Proposed OTP: Pierce County

4. Contact information of proposed OTP Agency Administrator: Dr. Asif Rashid Khan, CEO/Medical Director, Telephone: (253) 666-5912, E-mail: akhan@nwih.org

5. Brief Program Description: Northwest Integrated Health submitted a branch application to DBHR on February 15, 2018, for certification of an opiate substitution treatment program (OTP). The OTP is proposed to be located at 3727 South Tacoma Way, Tacoma, Washington 98409

Northwest Integrated Health presently has three DBHR certified behavioral health agencies in Pierce County at the following addresses:

1.) Northwest Integrated Health- Main; 3800 3rd Street Southeast, Puyallup, WA, 98374

2.) Northwest Integrated Health- Lakewood; 9720 South Tacoma Way, Lakewood, WA 98499

3.) Northwest Integrated Health- Tacoma; 5929 Westgate Boulevard, Suite A, Tacoma, WA 98406

Additionally, Northwest Integrated Health presently has one DBHR Certified Opioid Treatment Program specific behavioral health agency in Pierce County at the following address:)Northwest Integrated Health- Lakewood; 9720 South Tacoma Way, Lakewood, WA 98499

Northwest Integrated Health has been providing DBHR certified behavioral health treatment services since July 24, 2013. Northwest Integrated Health has been providing DBHR certified OTP behavioral

health treatment services at their Northwest Integrated Health- Lakewood branch in good standing since August 1, 2016.

Northwest Integrated Health's current Pierce County OTPs is registered with the Washington State Board of Pharmacy, licensed by the federal Drug Enforcement Administration (DEA), are certified by the federal Center for Substance Abuse Treatment (CSAT), Substance Abuse and Mental Health Services Administration (SAMHSA), and are accredited by the federally recognized accreditation body of DBHR

Public hearings for the prospective OTP were previously held by DBHR in Pierce County in Tacoma on March 30, 2018; and in Tacoma on May 10, 2018, to allow the community where an OTP will be located to present testimony to DBHR on the proposed OTP as per RCW 71.24.590(1)(h).

PART C – COMMENTS FROM CITY/COUNTY/LEGISLATIVE AUTHORITY (PLEASE COMPLETE THIS PORTION)

Please review, evaluate, and comment on the proposed OTP in your area.

1. Please comment on support by city or county legislative authorities for proposed OTP services.

The Tacoma City Council is supportive of medically assisted opioid treatment, and acknowledges the need for greater availability of medically assisted opioid treatment. The Council supports well run medically assisted opioid treatment facilities which are good neighbors, and do not create adverse impacts on adjacent residents and businesses. The Council emphasizes the need for geographic dispersal of medically assisted opioid treatment facilities, so they are not concentrated within one, or a limited number of neighborhoods or business districts, and are sited at locations with ready access to public transit.

The Council encourages, and invites the Washington State Department of Social and Health Services, DBHR to engage early and collaboratively with local jurisdictions in assessing the need for additional medically assisted opioid treatment facilities, and identifying criteria for appropriate siting of those facilities to meet identified community needs without adversely impacting neighboring residents or businesses.

2. Please comment on the proposed site location.

The Northwest Integrated Health Lakewood facility is located at 9720 South Tacoma Way, and the proposed facility is to be located at 3727 South Tacoma Way essentially bracketing the South Tacoma Way Business District. The Council has concerns regarding this concentration of medically assisted opioid treatment facilities within a single region and business district. The site is zoned "CIX" Commercial Industrial Mixed Use. The proposed use of the site is permitted. Though the City of Tacoma code allows the proposed facility, it should be noted that a marijuana processing facility is located across the street.

3. Please comment on the accessibility of transportation to the proposed site.

The nearest regular Pierce Transit service is Route 52 with current stops at South 35th and Union and at South 38th and Warner, which is a substantial uphill walk from the site. The Council has concerns regarding transit availability, particularly with regard to the uphill walk required of patients following daily treatment. Regarding vehicle access, the site fronts on South Tacoma Way, which is an Arterial street and includes off street parking.

4. Comment on coordination of proposed OTP with other health care service providers within the service area.

Though members of the City Council attended both DBHR public hearings, the Council has no information regarding coordination between the proposed OTP with other health care service providers within the service area. This lack of information underscores the Council's concerns regarding a lack of early and collaborative engagement with local jurisdictions and communities.

Signature of person from the Date County/City Legislative Authority completing this form Type or Print

Mayor Victoria Woodards

Date: _____

Please return the city/county legislative authority comments form and any supporting documentation by June 8th, 2018.

Please return this material via mail, or e-mail to:

**Jodi Taylor, Certification Policy Manager
Division of Behavioral Health and Recovery
Behavioral Health Administration
Post Office Box 45330
Olympia, Washington 98504-5530
Phone: (360) 725-1456
Fax: (360) 725-2279
E-Mail: Jodi.Taylor@dshs.wa.gov**