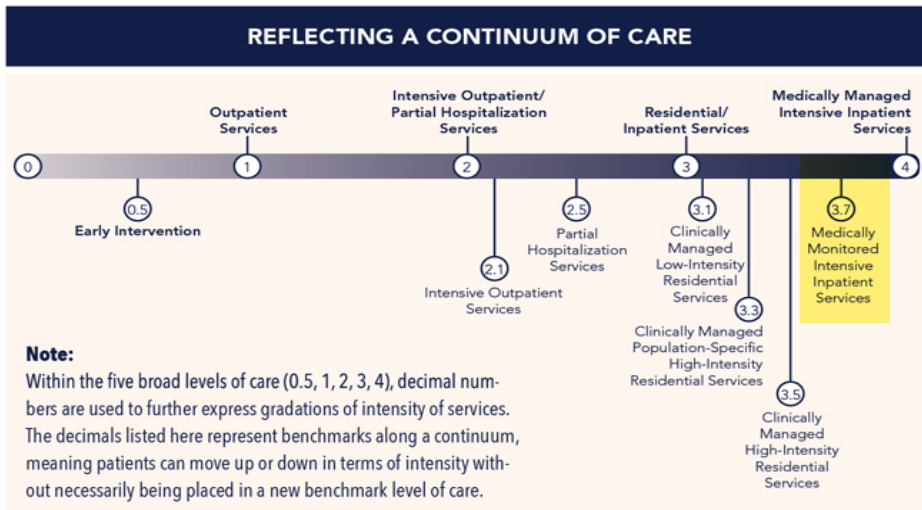


Planning Commission,

I wanted to write to give you more background into Residential Treatment Facilities (RTF) and the American Society of Addiction Medicine's (ASAM) Levels of Care. I wanted to share this information in the hope that we can do some good work for the city of Camas - while recognizing the seriousness of this issue and the background I believe it deserves.

The American Society of Addiction Medicine <https://www.asam.org/> is the largest leading professional society in addiction medicine. The ASAM *Criteria* and ASAM CONTINUUM are companion text and application that provides counselors, clinicians, and other treatment team members with a computer-guided, structured interview for assessing and caring for patients with addictive, substance-related, and co-occurring conditions.

As you are considering RTF zoning I would encourage you to take a look at their materials. There is a broad range of diagnosis criteria relating to different types of facilities - from Sober Living Homes to full hospital resources.



To give context - Discover Recovery, despite a PR piece in the [Camas-Washougal Post Record](#) in which the owners align themselves more as a day spa with resources like “yoga, acupuncture, nutritional therapies and EMDR, or eye movement desensitization and reprocessing,” - is applying for a **Level 3.7** license (the highest level directly underneath full hospital Level 4.0). *Please review the chart on page 2 for more information on the dimensions and Levels of Care.*

Level 3.7 includes patients with:

- a high risk of withdrawal
- low interest in treatment and impulse control is poor,
- Unable to control use, with imminently dangerous consequences despite active participation at less intensive levels of care.
- consumer lacks skills to cope outside of a highly structured 24-hour setting
- Surpasses even Level 3.5 which includes “demonstrates repeated inability to control impulses, or unstable and dangerous signs”

This chart is the reason that many of us are so concerned about this facility and getting our zoning correct. I absolutely feel that our community needs appropriate resources, but I also cannot ignore the fact that out-of-state Level 3.7 individuals detoxing from methamphetamine, with poor impulse control, can now be admitted to a facility sharing a fence with six-year-olds playing, and can leave at any time.

Obviously we need locations for these facilities, at all ends of the continuum. What levels would be allowed at what locations?

Please, let's give this the deep-dive that it deserves. I would also consider you all to read this [NPR piece](#) that came out last year about this industry.

Thank you for your time.

Adult ASAM Placement Criteria Crosswalk

Adult ASAM Worksheet	Level 0.5: Early Intervention	OTP Level 1: Opioid Treatment Program	Level 1: Outpatient Services	Level 2.1: Intensive Outpatient Treatment	Level 2.5: Partial Hospitalization	Level 3.1: Clinically Managed Low-Intensity Residential Services	Level 3.3: Clinically-Managed Population Specific High-Intensity Residential Services	Level 3.5: Clinically Managed High Intensity Residential Services	Level 3.7: Medically Monitored Intensive Inpatient Services	Level 4: Medically Managed Intensive Inpatient Services
Dimension 1: Acute Intoxication and/or Withdrawal Potential	No withdrawal risk	Physiologically dependent on opioids and requires OTP to prevent withdrawal	Manageable at Level 1-WM	Manageable at Level 2-WM	Manageable at Level 2-WM	Concurrently receiving Level 1-WM or Level 2-WM services	If withdrawal is present, manageable at Level 3.2-WM	If withdrawal is present, manageable at Level 3.2-WM	At high risk of withdrawal, but manageable at Level 3.7-WM and does not require the full resources of a licensed hospital	At high risk of withdrawal and requires Level 4-WM and the full resources of a licensed hospital
Dimension 2: Biomedical Conditions and Complications	None or very stable	None or manageable with outpatient medical monitoring	None or very stable, or is receiving concurrent medical monitoring	None or not a distraction from treatment	None or not sufficient to distract from treatment	None or stable, or receiving concurrent medical monitoring	None or stable, or receiving concurrent medical monitoring	None or stable, or receiving concurrent medical monitoring	Requires 24 hours medical monitoring but not intensive treatment	Requires 24 hour medical and nursing care and the full resources of a licensed hospital
Dimension 3: Emotional, Behavioral or Cognitive Conditions and Complications	None or very stable	None or manageable in an outpatient structured environment	None or very stable, or is receiving concurrent medical monitoring	Mild severity with the potential to distract from recovery; needs monitoring	Mild to Moderate severity with the potential to distract from recovery; needs stabilization	None or minimal; not distracting to recovery. If stable, a co-occurring capable program is appropriate. If not, a co-occurring enhanced program is required	Mild to moderate severity; needs structure to focus on recovery. Tx should be designed to address significant cognitive deficits. If stable, a co-occurring program is appropriate. If not, a co-occurring enhanced program is required	Demonstrates repeated inability to control impulses, or unstable and dangerous signs/sx require stabilization. Other functional deficits need stabilization and 24-hour setting to prepare for community integration and continuing care. A co-occurring enhanced setting required for those with severe and chronic MI	Moderate severity; needs a 24-hour structured setting. If the consumer has a co-occurring mental disorder, requires concurrent MH services in a medically monitored setting	Because of severe and unstable problems, requires 24 hour psychiatric care with concomitant addiction tx (co-occurring enhanced)
Dimension 4: Readiness to Change	Consumer is willing to explore how tobacco, alcohol, or medication use and/or high risk behaviors may affect personal goals	Ready to change the negative effects of opioid use, but is not ready for total abstinence from illicit prescription or non-prescription drug use	Ready for recovery but needs motivating and monitoring strategies to strengthen readiness, or needs ongoing monitoring and disease management. Or high severity in this dimension but not in other dimensions. Needs Level 1 motivational enhancement strategies.	Has variable engagement in treatment, ambivalence, or a lack of awareness of the substance use or MH problem, and requires a structured program several times a week to promote progress through the stages of change	Has poor engagement in tx, significant ambivalence or a lack of awareness of the substance use or MH problem, requiring a near-daily structured program or intensive engagement service to promote progress through the stages of change	Open to recovery, but needs a structured environment to maintain therapeutic gains	Has little awareness and needs interventions available only at Level 3.3 to engage and stay in tx. If there is high severity in Dimension 4 but not in any other dimension, motivational enhancement strategies should be provided in Level 1	Has marked difficulty with, or oppositional to, tx, with dangerous consequences. If there is high severity in Dimension 4 but not in any other dimension, motivation enhancement strategies should be provided in Level 1	Low interest in tx and impulse control is poor, despite negative consequences; needs motivating strategies only safely available in a 24-hour structured setting. If there is high severity in other dimension, motivational enhancement strategies should be provided in Level 1	Problems in this dimension do not qualify the consumer for Level 4 services. If the consumer's only severity is in Dimension 4.5 and/or 6 without high severity in Dimensions 1,2, and/or 3, then the consumer does not qualify for Level 4
Dimension 5: Relapse, Continued Use or Problem Potential	Needs an understanding of, or skills to change, current alcohol, tobacco, other drug, or medication use patterns and/or high risk behavior	At high risk of relapse or continued use without OTP and structured therapy to promote tx progress	able to maintain abstinence or control use and/or addictive behaviors and pursue recovery or motivational goals with minimal support	Intensification of addition or MH sx, despite active participation in a Level 1 or 2.1 program; indicates a high likelihood of relapse or continued use or continued problems without near daily monitoring and support several times a week	Intensification of addiction or MH sx, despite active participation in a Level 1 or 2.1 program; indicates a high likelihood of relapse or continued use or continued problems without near daily monitoring and support	Understands relapse, but needs structure to maintain therapeutic gains	Has little awareness and needs interventions available only at Level 3.3 to prevent continued use, with imminent dangerous consequences, because of cognitive deficits or dysfunction	Has no recognition of the skills needed to prevent continued use, with imminent dangerous consequences	Unable to control use, with imminently dangerous consequences despite active participation at less intensive levels of care	Problems in this dimension do not qualify the consumer for Level 4 services. See further explanation in Dimension 4
Dimension 6: Recovery Environment	Social support system or significant others increase the risk of personal conflict about alcohol, tobacco, and/or other drug use	Recovery environment is supportive and/or consumer has the skills to cope	Recovery environment is supportive and/or the consumer has skills to cope	Recovery environment is not supportive, but with structure and support the consumer can cope	Recovery environment is not supportive, but with structure and support and relief from the home environment, the consumer can cope	Environment is dangerous, but consumer needs 24-hour structure to learn to cope	Environment is dangerous and the consumer lacks skills to cope outside of a highly structured 24-hour setting	Environment is dangerous and the consumer lacks skills to cope outside of a highly structured 24-hour setting	Environment is dangerous and the consumer lacks skills to cope outside of a highly structured 24-hour setting	Problems in this dimension do not qualify the consumer for Level 4 services. See further explanation in Dimension 4

To select the correct level of care, choose the highest level of care that has two or more criteria met. Review admission criteria for chosen level of care to ensure proper clinical fit.