Ohio Department of Alcohol and Drug Addiction Services 280 N. High St 12th Floor Columbus OH 43215-2550

October 6, 2005,

Subject: Reclassification of an Outpatient Program

To Whom It May Concern:

The intention of this letter is to serve as a request from ISAC Corporation to ODADAS to reclassify Kids Helping Kids (KHK), a drug treatment program located in Milford OH, as either an inpatient or residential treatment program.

One of the primary components of the treatment modality used by KHK is the "host home". The host home is an extension of the main building used to treat clients during regular business hours. While residing in a host home, clients are not in the "Natural Environment". The first phase of treatment lasts 24 hours a day 7 days a week until the client progresses to higher phases. These clients, known as newcomers, are escorted using physical contact by "oldcomers" to and from the building and the transport vehicle, and from the transport vehicle to and from the host home. Oldcomers are clients who are on 2nd phase or higher in the 5 phase system of the treatment structure.

Furthermore, to consider this treatment as outpatient, ODADAS must note that outpatient treatment programs typically allow clients to contact and visit their parents at any given time and vice versa. It is policy of KHK to conceal the location of newcomer clients and their host home. KHK allows newcomers only a few minutes of verbal contact with their parents during open meetings. Close monitoring by oldcomers during these "talks" prevents privacy and restricts the ability of the newcomer to speak freely.

In addition to the restrictions placed on newcomers, the policy stating No TV, No Radio and No reading, writing other than the daily Moral Inventory, denies these children their basic rights as Americans and humans. Outlined in the enclosed documents, are guidelines pertaining to Thought Reform. These relate to the treatment modality used by KHK. It is obvious to ISAC Corporation that the host home component used by KHK and an associated program with facilities in Indiana and Michigan called Pathway Family Center, has presented classification problems with authorities who license these programs.

As outlined in its April 4, 2005 complaint against KHK, ISAC Corporation stated that KHK uses the treatment modality developed by STRAIGHT, INC. At this time, please note that Pathway Family Center uses this treatment modality. ISAC Corporation has determined that KHK has had an ongoing business relationship with Pathway Family

Center for many years, according to the statement of the Pathway Family Center marketing director. This relationship exists based on the recent discovery of an employment advertisement placed by Pathway Family Center on behalf of KHK. Enclosed, with this request, is a copy of that advertisement.

The following is an excerpt of a letter from David Kay; Clinical Director of Pathway Family Center at the time, to Ms. Burden of the Michigan Department of Social Services, Division of Child Welfare and Licensing dated August 23, 1994.

"Since its inception on July 1, 1993, Pathway Family Center has been dedicated to preserving the most effective components of the original Straight treatment model. At the same time, we have incorporated the following improvements"

The KHK program will not function properly without the use of host homes as an integral part of its treatment process. Regardless of the fact that the host homes are "off campus" so to speak, there is no freedom for the newcomers to exist outside the program. Thus, KHK clinical treatment is used inside the host homes. Host homes are there to ensure that the program is successful by achieving its primary goal of reforming the thoughts of its clients in its attempt to make the clients want to be drug free. For this reason, the newcomers will never be in the "Natural Environment" as long as KHK uses the host homes as part of their treatment.

ISAC Corporation believes that the classification of KHK as an outpatient program is incorrect. It is our hope that ODADAS will take the necessary steps to re-classify KHK as soon as possible. KHK host homes being used in their current role with the KHK treatment modality should be licensed individually as residential or inpatient treatment facilities.

Dana Harlow stated that during the investigation of the April 4, 2005 complaint that he did not visit a host home, even though serious concerns about this issue were alleged. As part of this request for reclassification, ODADAS should also include an inspection and review of each of the host homes being used by KHK.

Please contact our office for any comments or questions.

Sincerely,

William Earnshaw, Sr. Chairman, ISAC Corporation www.isaccorp.org 540-788-3308