

LEO J. TRICH, JR., MEMBER
150 WEST BEAU STREET, ROOM 217
WASHINGTON, PENNSYLVANIA 15301
PHONE: (724) 228-9047

ROOM 26B, EAST WING
HOUSE BOX 202020
HARRISBURG, PENNSYLVANIA 17120-2020
PHONE: (717) 787-9473
FAX: (717) 772-2284



House of Representatives
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

March 22, 1999

COMMITTEES

APPROPRIATIONS
COMMERCE AND ECONOMIC DEVELOPMENT
HEALTH AND HUMAN SERVICES
SUBCOMMITTEE CHAIRMAN, HEALTH
INTERGOVERNMENTAL AFFAIRS
POLICY

STEEL CAUCUS, CHAIRMAN

SOUTHWEST CAUCUS, VICE CHAIRMAN

Margaret E. Trimble, Director
Emergency Medical Services Office
Department of Health
1027 Health & Welfare Bldg.,
P.O. Box 90
Harrisburg, PA 17108

ORIGINAL: 2003

BUSH

COPIES: McGinley
Harris
Smith
Jewett
Sandusky
Legal
Notebook

PROCESSED
99 MAR 26 PM 2:47
HOUSE OF REPRESENTATIVES
HEALTH COMMISSION

Re: **Proposed Amendments 28 Pa.**
Code, Emergency Medical Services;
Section 1001.2, "Board Certification".

Dear Ms. Trimble:

As a senior member of the House Health & Human Services Committee, I hereby submit comments pertaining to the above referenced proposed amendment to 28 Pa. Code Part VII (relating to emergency medical services) as published in the Pennsylvania Bulletin, Volume 29, Number 7, part II, dated February 13, 1999. My focus centers on concerns raised from constituents to the proposed Chapter 1001, Subchapter A, Section 1001.2 and the impact of the proposed definition of "Board Certification".

As I understand the matter, the Department of Health seeks to define "board certification" in a fashion that excludes one private certifying body in preference to other certifying bodies without having established criteria for recognition of certifying bodies.

My office has received a number of letters setting forth that the effect of the proposed regulatory change will adversely impact on and essentially exclude a substantial number of physicians from participation in the Pennsylvania emergency medical system. This group of physicians are certified by the American Association of Physician Specialists, Inc., (AAPS). This organization is recognized by the American College of Continued Medical Education, (ACCME), whereas osteopathic boards are not recognized. Indeed, the AAPS is a national organization established in 1950 and incorporated in 1952 to provide a clinically recognized mechanism for specialty certification of physicians with advanced training through an examination process. The AAPS is the administrative home for twelve Boards of Certification. Each AAPS affiliated board of

Margaret E. Trimble
March 22, 1999
Page Two

certification has established criteria for examination development, examination validation, and candidate admission to the certification process.

The Regional Emergency Medical Services Council of New York City, Inc., and the Regional Emergency Medical Advisory Committee of New York (REMAC) have recognized that the AAPS boards - in particular the Board of Certification in Emergency Medicine (BCEM) - is equivalent to the American Board of Emergency Medicine (ABEM) and the American Osteopathic Board of Emergency Medicine (AOBEM). There are no associated issues of quality of care provided by BCEM certified physicians.

While Subchapter A. *General Provisions* of this proposed rulemaking sets forth that reference to specific certifying bodies does not preclude the Department of Health from considering persons with certifications by other private certifying bodies, perhaps you can understand the chilling impact the present language would have on this extremely qualified group of professionals.

Based on the above set of facts, inclusion rather than exclusion is required.

Accordingly, I respectfully request that the language in proposed Pa. Chapter 1001, Subchapter A, Section 1001.2 (Definitions) be amended to include the American Association of Physician Specialists, Inc., I am hopeful that the concerns articulated herein can be addressed.

Thank you for your attention.

Sincerely,

Leo J. Trich, Jr.,

c: The Honorable Dennis M. O'Brien
The Honorable Frank L. Oliver
Independent Regulatory
Review Commission
David Bronstein, D.O.
James N. Rintoul, M.D.
Debra K. Hermany, D.O.