

21ST SENATORIAL DISTRICT  
**MARY JO WHITE**

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*Senate of Pennsylvania*

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Original: 2003

August 31, 2000

Robert E. Nyce  
Executive Director  
Independent Regulatory Review Commission  
14<sup>th</sup> Floor Harrisstown 2  
333 Market Street  
Harrisburg, PA 17101

Re: **Final Regulation #10-143** Emergency  
Medical Services

Dear Mr. Nyce:

I am writing concerning the above-referenced final regulation which is scheduled for consideration by the Independent Regulatory Review Commission at the Commission's September 7, 2000 meeting.

A current BCEM-certified (Board of Certification in Emergency Medicine) physician recently contacted me to express concern about this regulation's impact on Medical Command Physicians. Current minimum requirements to be a medical command physician require the individual to be board-certified or complete certain approved courses, however the regulation does not define "board certification".

It is my understanding the new regulations define "board certification" in a manner that excludes BCEM individuals. I also understand the Department of Health has removed "board certification" as a prerequisite to qualify as a medical command physician. Instead, the Department of Health lists a set of criteria that will enable many BCEM individuals to retain their positions as medical command physicians. This appears to render the issue of "board certification" moot because many, albeit not all, BCEM individuals will still be qualified to serve as medical command physicians.

I urge the commissioners to consider the following: why is the definition of board certification retained; does the definition have implications elsewhere in the regulation; and does the definition unfairly discriminate against individuals certified by BCEM. I believe it is important for the Independent Regulatory Review Commission to have a full understanding of these issues prior to its consideration of the regulation.

Thank you very much for your consideration of these comments.

Sincerely,

*Mary Jo White*  
MARY JO WHITE  
SENATOR, 21<sup>ST</sup> DISTRICT

MJW/ph

cc: Honorable Hal Mowery, Chairman  
Senate Public Health & Welfare Committee

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