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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF PUBLIC WELFARE

April 4, 2012

The Honorable Silvan B. Lutkewitte III Chairman Independent Regulatory Review Commission 14th Floor, Harristown 2 333 Market Street Harrisburg, Pennsylvania 17101

Re: Final Regulation No. 16A-4929 - Behavior Specialist

Dear Chairman Lutkewitte:

The Department of Public Welfare (DPW) would like to acknowledge our support for Regulation #16A - 4929: Behavior Specialist. DPW has worked closely with the Departments of State and Insurance on these regulations over the past few years and we feel strongly that the final form regulation supports licensure of Behavior Specialists as an effective means to increase access to qualified professionals for the treatment of individuals with autism disorder.

The services provided by these professionals are all the more critical today, as demonstrated by a report released just last week by the Centers for Disease Control and Prevention. This report estimated that one child in 88 is diagnosed with some form of autism spectrum disorder, an increase of 78% in the past decade alone. The licensure and regulation of behavior specialists by the State Board of Medicine is an important step toward ensuring that Pennsylvania's provider community has the resources required to address the critical needs of our citizens.

The Commonwealth is committed to ensuring that children and adolescents with autism have access to the highest quality of care and continues to encourage discussions with insurance carriers, both in the public and private arenas to encourage their provider networks to maintain adequate levels of qualified professionals to provide treatment for autism spectrum disorder. This final regulation package will do just that.

We believe that the addition of the Board of Medicine's Behavior Specialist license will help increase access to care by adding a new category of licensed professional to the list of qualified professionals providing care to children with autism. The goal of the licensure for Behavior Specialists is to effectively license and create networks of skilled specialists who will be able to evaluate and implement treatment plans for children with autism. DPW strongly supports this final regulation package as an essential tool to provide these critical services to Pennsylvania's children.

Sincerely, Garv D. Alexander

Secretary

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