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House of Representatives
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

2820

March 24, 2010

Mr. Kim Kaufman
Executive Director
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RE: Proposed Regulation
State Board of Medicine
16A-4929: BEHAVIOR SPECIALIST

Dear Mr. Kaufman:

The House Professional Licensure Committee on this date voted to take no formal action until final regulations are promulgated and submit the following comments:

1. The Committee requests some guidance of what other major courses of study may be included in "another related field" in §18.524, Criteria for certification as behavior specialist.
2. The Committee requests that in §18.524(c) the experience of at least 1000 hours be "direct" experience in a related field with individuals with autism spectrum disorders so that the experience is not obtained in passive approaches, i.e. only watching videotapes, although they may have some relevancy.

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3. The Committee suggests that a term such as "lapsed" be used when referring to the certificate holder who is reactivating an inactive certification or an expired one in §18.526; especially, since subsection (b) reads "a person previously certified as a behavior specialist is not considered to be a certificate holder during any period when the certification was inactive.
4. The Committee brings to the Board's attention that no provision is made for any continuing education requirement for renewing or reactivating the certification as a behavior specialist. To carry out the expectations and consistency of the Bureau of Professional and Occupational Affairs with its other licensees and certificate holders, it is recommended that such a requirement be created.

Sincerely,



Michael P. McGeehan
Chairman, House Professional Licensure Committee