

**Blackburn, Thomas**

# 2820

REC 11

**Subject:** RE: State Board of Medicine - Behavior Specialist Certification

-----Original Message-----

**From:** John R. Doubman [mailto:jdoubman@ifpenn.org]

**Sent:** Tuesday, March 16, 2010 11:44 AM

**To:** mmcgeeha@pahouse.net; jharhart@pahousegop.com; boscola@pasenate.com; rtomlinson@pasen.gov; ST, MEDICINE

**Subject:** State Board of Medicine - Behavior Specialist Certification

Please find below the Insurance Federation's endorsement of concerns regarding the Board of Medicine's proposed regulation 16A-4929. Thank you.

**The Insurance Federation of Pennsylvania, Inc.**

1600 Market Street  
Suite 1520  
Philadelphia, PA 19103  
Tel: (215) 665-0500 Fax: (215) 665-0540  
E-mail: mailbox@ifpenn.org

**John R. Doubman**  
2010  
Secretary & Counsel

March 16,

Regulatory Unit Counsel  
Pennsylvania Department of State  
P.O. Box 2649  
Harrisburg, PA 17105-2649

**Re: Proposed Regulation 16A-4929**

Dear Regulatory Counsel:

I apologize sincerely on behalf of the Insurance Federation of Pennsylvania for submitting this comment the day after the designated expiration date for public comment on the captioned regulation. As the comment raises no new ground beyond what has already been submitted, I hope that you will kindly accept this letter as a legitimate addition to the public debate.

I write to advise that the Federation endorses the concerns expressed by Blue Cross of Northeastern Pennsylvania in its March 15 comment letter over the problems created by the State Board of Medicine's proposal for a certification rather than a licensure process. Those problems are correctly and succinctly stated in

that letter by Dr. Thomas Curry, BCNEPA's Medical Director.

The Federation believes the Board upon review will recognize the legitimacy of this concern and revise its proposal. That is our recommendation as well.

Thank you very much for considering our late filed comment.

Respectfully yours,

John R. Doubman

cc: The Honorable Robert M. Tomlinson, Majority Chairman,  
Consumer Protection & Professional Licensure  
The Honorable Lisa M. Boscola, Minority Chairman, Consumer  
Protection & Professional Licensure  
The Honorable Michael McGeehan, Majority Chairman,  
Professional Licensure  
The Honorable Julie Harhart, Minority Chairman, Professional  
Licensure