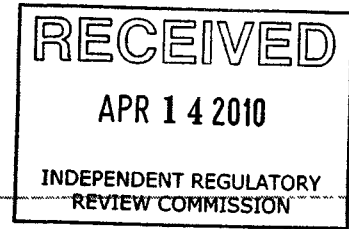


#2820

From: Hoffman, Stephen F.
Sent: Wednesday, April 14, 2010 7:58 AM
To: Schalles, Scott R.
Subject: FW: Proposed Regulation 16A - 4929



From: Kaufman, Kim
Sent: Tuesday, April 13, 2010 4:29 PM
To: Wilmarth, Fiona E.; Johnson, Leslie A. Lewis; Outreach
Subject: Fw: Proposed Regulation 16A - 4929

From: Stuart, Alyson B
To: st-medicine@state.pa.us
Cc: rtomlinson@pasen.gov ; lbaker@pasen.gov ; mmcgeeha@pahouse.net ; jharhart@pahousegop.com ; Kaufman, Kim
Sent: Tue Apr 13 16:23:09 2010
Subject: Proposed Regulation 16A - 4929



April 13, 2010

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

Re: Proposed Regulation 16A-4929

Dear Regulatory Counsel:

First I must apologize on behalf of Highmark for submission of comments past the stated due date for public comment regarding the State Board of Medicine's ("Board") proposed rulemaking for behavior specialists – 16A-4929. While it is not our practice to comment subsequent to such deadlines, we respectfully ask that we be permitted to share our concerns regarding the proposed regulations, which mirror those raised by Dr. Thomas Curry, Blue Cross of Northeastern Pennsylvania (BCNEPA), in his letter dated March 15, 2010.

Although Highmark fully supports the Board's efforts to implement qualification and training requirements for behavior specialists, we respectfully question the proposal to lower the standard for behavior specialists from licensure to certification. We believe that a standard of certification would create a potentially confusing two-tiered credentialing process for providers seeking to join Highmark's provider networks and a regulatory conflict within the Commonwealth.

The proposed certification requirement permits individuals to treat individuals with autism spectrum disorders ("ASD") without the benefit of licensure, a standard which is counter to our commitment of providing access to high quality health care delivered by licensed providers and potentially dilutes the strides in quality of care made by the Commonwealth. While certification may be appropriate in other areas, we do not believe it is

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