



Pennsylvania Association for Marriage and Family Therapy

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May 23, 2011

Ms. Regina Wall-Cote
Bureau of Autism Services
Department of Public Welfare
P.O. Box 2675
605 Health and Welfare Building
Harrisburg, PA 17105

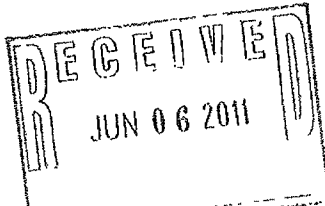
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Dear Ms. Wall-Cote:

Act 62 of 2008 requires the creation of certification/licensure of behavioral specialists and charged the State Board of Medicine with promulgating regulations to that end. While the Pennsylvania Association for Marriage and Family Therapy (PAMFT) recognizes the need to ensure Behavior Specialists working with children with Autism Spectrum Disorders (ASD) are qualified and trained to provide a specialized service, we believe that inconsistent interpretations of the law and final form regulation 16-4929 between the various state agencies could result in many unintended consequences. Upon thorough review, PAMFT feels that the regulation, as drafted, would shrink the availability of licensed professionals who currently deliver autism spectrum disorder services to the detriment of those desperately in need of their assistance.

Absent clarification, requiring Licensed Marriage and Family Therapists (LMFTs) to secure a separate behavioral specialist license in order to work with clients on the autism spectrum may very well be redundant to the program coursework our members undertook to become licensed in the Commonwealth. Moreover, it is unclear what accrediting body will be responsible for developing the curriculum for the behavioral specialist license which would make it impossible for LMFT programs to be amended with the additional coursework and/or requirements. Finally, mandating that professionals secure the separate license within one year absent knowing the specific education requirements and/or clinical experience is impractical.

On May 19, 2011, PAMFT was notified that the State Board of Medicine requested the Independent Regulatory Review Commission (IRRC) to withdraw 16-4929 in order to address comments that it has received following delivery of that final rulemaking. PAMFT understands that in addition to a license the Bureau of Autism Services and the State Board of Medicine will work to clarify the outstanding issues, as well as develop a behavioral specialist certification. PAMFT would like to be included in these



discussions. We will be available to answer any questions you may have in terms of the issues raised in this correspondence.

Sincerely,

Rita Pareca LMFT

President, PAMFT

Cc.

Carol E. Rose, Chairwoman
State Board of Medicine
P.O. Box 2649, Harrisburg, PA 17105-2649

