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February 25, 2014

Support for Raised Bill No. 192: AN ACT CONCERNING THE QUALIFICATIONS OF CLINICAL PEERS FOR ADVERSE DETERMINATION REVIEWS

Dear Members of the Committee on Insurance and Real Estate:

My name is Barbara S. Bunk and I am writing as President of the Connecticut Psychological Association, in support of Raised Bill No. 192, AN ACT CONCERNING THE QUALIFICATIONS OF CLINICAL PEERS FOR ADVERSE DETERMINATION REVIEWS.

The role of clinical peer in adverse determination reviews holds a great deal of responsibility, with the reviewer making important decisions which may have significant impacts on the healthcare provider being reviewed. As such, the academic credential, licensure, board certification, and practice specialty requirements set forth in this bill are all important safeguards which help ensure the reviewer's expertise and competence, and also decrease the likelihood of arbitrary or unfair findings. The particular language utilized in the bill specifically addresses physicians, however, and might inadvertently preclude doctoral level psychologists. Psychological training does not include "national board certification (line # 10, criteria (A) (iii) (I))." Psychologists are licensed by states, and while some states identify specialty areas within a license, it is not currently the general practice to do so. Ethically, psychologists are of course mandated to practice only "... within the boundaries of their competence, based on their education, training, supervised experience, consultation, study or professional experience." (Standard 2.01 (a) *Ethical Principles of Psychologists and Code of Conduct* published by the American Psychological Association). This will insure appropriate doctoral psychologist reviewers.

There are three criteria in SB 192 where the inexactitude occurs. To be more precise for doctoral level psychologists, criteria (A) (iii) (III) could be added to read "or, has training or clinical experience in the procedure or treatment." Regarding substance use disorders for children (lines 19 -20, criteria (B) (i) (III)) and adults (line 25 - 26 (B) (ii) (III)), an apt solution would be to delete "and" on line 20 and line 26, and replace it with "or." The criteria would then read "...national board certification...or has training and experience in..."

Please feel free to contact us if we can be of further assistance.

Barbara S. Bunk, Ph.D.
Connecticut Psychological Association, President 2011 - 2014