



HEALTH, EDUCATION & LEGAL ASSISTANCE PROJECT: A MEDICAL-LEGAL PARTNERSHIP
WIDENER UNIVERSITY - DELAWARE LAW SCHOOL

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Re: Chapter 56 Working Group
Form of Medical Certificate
Docket No. L-2015-2508421

Dear Pennsylvania Public Utility Commission:

We write in response to your call for public comment to Docket No. L-2015-2508421 regarding the form of the medical certificate.

The Health, Education, and Legal Assistance Project (HELP: MLP) is a legal services provider with locations in Philadelphia and Delaware counties in Pennsylvania. HELP: MLP partners with maternal and child health providers to improve families' health through legal interventions that focus on unmet needs that have health harming impacts.

One of the unmet needs we frequently witness among our families is utility insecurity. Utility insecurity and utility shutoffs have significant impacts on children's abilities to grow and thrive. As lawyers and nurses, we regularly support our clients in obtaining medical certificates from physician's offices. This process can be both onerous and embarrassing for our clients, who are often told that physician's offices have a policy of not signing medical certificates due to a misunderstanding of their purposes or the time involved in obtaining and signing the forms.

Medical certificates serve as an important safeguard for our patients who face a myriad of health problems in addition to the everyday challenges of being poor. Their health problems often keep them from working full time and make keeping up with ever-increasing housing, food, and utility expenses very challenging. Our patients run the gamut from those who rely on medical devices for survival to those who need to keep life-sustaining medications refrigerated to those whose health would be put in jeopardy without access to heating or cooling service.

Utility service is acutely necessary for the health and wellbeing of families with young children in particular. Hot water is necessary for the safe preparation of formula. Refrigeration is necessary for safe storage of breastmilk. Electricity is necessary for a mom who pumps milk for her baby. Extreme temperature fluctuations can be deadly for young infants. Additionally, the stress of a utility shutoff has long term negative impacts on children. A utility shutoff stresses parents, and distracts them from the work of raising their kids and working outside the home. It may cause a move to a less safe neighborhood, a breakup of the family as friends or relatives may not be able to house an entire family unit, or a call to child protective services.

Medical certificates are one of the most important tools our families have to prevent the devastating impacts of a utility shutoff. We encourage the Commission to make the following changes to improve the ease with which our families, and others across Pennsylvania, will be able to obtain medical certificates to preserve their utility service and their health.



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We recommend that the form of the medical certificate be succinct and contain only the elements required by law. Lengthy certificates that request unnecessary information can be onerous for already over-burdened physicians' offices. The form should be optional, and physicians' offices should have the ability to submit a standard form or even a letter on their own letterhead verifying the medical need for a shutoff to be delayed or avoided. A license number should not be required. The inclusion of a license number may lead a physician to believe that their license and medical judgment is on the line when they are signing a medical certificate and thereby discourage them from doing so. Moreover, license numbers are not routinely included in medical records or other legal documents. Finally, we recommend that the form be posted and readily available on utility websites. We have seen physicians' offices have long wait times after requesting that a certificate be faxed to them, and we have had to watch as families miss utility shutoff deadlines because there have been delays or communication issues in the delivery of the medical certificate. Making the form readily available will ease the process for utility providers and customers alike, and most importantly, protect the health of vulnerable Pennsylvanians.

Thank your consideration and the opportunity to submit these comments.

Sincerely,

Rachel Mark
Staff Attorney, HELP: MLP