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ASSOCIATION FOR PROFESSIONAL ACUPUNCTURE
IN PENNSYLVANIA

APA

BOX 141 NEW HOPE, PA. 18938 215-862-3686



March 14, 2005

Dear Gerald Smith and Sabina Howell,

First of all I would like to thank you for the time that you spent with David Molony and myself. You both seemed intent on listening and genuinely wanting to address our concerns. Also, I want to thank you on the effort of writing the regulations. The combination of the old regulations and the amended new law did create times of ambiguity for our profession.

After meeting with our Executive Board, we still have the one suggestion that we discussed. That suggestion being including the TSE (Test for Spoken English) and still keeping the TOEFL in place. The TSE is an inexpensive and reasonable test and we feel the issue of being able to verbally communicate with the patient is important in regards to public safety. We also feel the TOEFL should stay in place since it is important in testing the understanding of written English.

In addition something that we did not discuss in our meeting. In my discussions with Tom Golden the then Executive Director of Professional Licensure Committee. He stated that referral, delegate, prescription to authorize, sign off and any other terminology were essentially the same thing. Physicians out in the public domain sometimes have their own notion of this and some are alarmed by referral more so than say prescribe. We suggest in 18.15 (1) the language "written referral" be changed to "written referral document" or "written referral or prescription." Hopefully this will help with any confusion by the physician or perhaps you may have some considerations to try to address our issue on this language.

In closing, is it possible that I get directly contacted when the second and third public comment times arise? Not having been through this process myself I have no idea on the timing of these things. Let me know if this is possible by contacting me directly via e:mail or phone. (by the number below) Thank you.

Sincerely,

A handwritten signature in black ink that reads "Benjamin W. Griffith II". The signature is written in a cursive style.

Benjamin W. Griffith II M.Ac., Dipl. Ac., R.Ac.

President of the APA

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