



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE BOARD OF MEDICINE

Post Office Box 2649
Harrisburg, Pennsylvania 17105-2649
(717) 783-2440

April 4, 2006

The Honorable John R. McGinley, Jr., Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
14th Floor, Harrisstown 2, 333 Market Street
Harrisburg, Pennsylvania 17101

Re: Proposed Joint Regulation
State Board of Medicine and Osteopathic Medicine
16A-4915: Athletic Trainers

Dear Chairman McGinley:

Pursuant to section 5(c) of the Regulatory Review Act, 71 P.S. § 745.5(c), enclosed is a copy of a written comment pertaining to a proposed joint rulemaking package received by the State Board of Medicine and Osteopathic Medicine regarding athletic trainers. (16A-4915)

Sincerely,

A handwritten signature in black ink that reads "Charles D. Hummer, Jr., M.D.".

Charles D. Hummer, Jr., M.D., Chairperson
State Board of Medicine

CDH/BSM/law
Enclosure

cc: Joyce McKeever, Deputy Chief Counsel
Department of State

Gina Bittner, Board Administrator
State Board of Osteopathic Medicine

INDEPENDENT REGULATORY
REVIEW COMMISSION

2006 APR 11 AM 9:24

RECEIVED

Robert S. Stasak
225 Oak Street
Wind Gap PA 18091

ORIGINAL: 2527

March 30, 2006

Beth Sender Michlovitz, Counsel
State Board of Osteopathic Medicine
P.O. Box 2649
Harrisburg PA 17105-2649

INDEPENDENT REGULATORY
REVIEW COMMISSION

2006 APR 11 AM 9:24

RECEIVED

Dear Beth Michlovitz:

I am writing to you regarding the proposed rulemaking for athletic trainers recently published in the Pennsylvania Bulletin. I would like to outline for you my specific concern.

I was certified under the Physical Therapy Practice Act in 1987. I have continued to maintain my certification under the Physical Therapy Board and after 2002 under the State Board of Medicine. I am not certified by the BOC or the NATA and I am not eligible to take their exam. I am working on a full-time basis and cannot go back to school to be eligible for BOC certification.

What concerns me is the fact that in order for me to renew my certification under the proposed rules and regulations I would be required to complete the continuing education requirements prescribed by the BOC. I do not know if I am able to take continuing education credits sponsored by the BOC if I do not have a BOC certification number. I would like to propose that a system be put into place for persons like myself who have been certified and working in the profession for many years to maintain this certification without becoming certified by the BOC. I have worked in this profession for 29 years. In order for me to obtain my full retirement, I must work 35 years. My fear is that it will be impossible for me to fulfill the BOC continuing education requirements because I am not certified by the BOC thereby essentially ending my employment 6 years before I am eligible for full retirement. This would adversely impact my retirement income for the rest of my life.

Please consider amending the proposed rules and regulations so that I am able to comply with the continuing education requirements and thereby maintain my certification.

Thank you for your consideration. This issue concerns me a great deal and could impact my ability to earn a living.

Sincerely,



Robert S. Stasak

cc Craig Dally, State Representative
Charles D. Hummer, M.D., State Board of Medicine
Oliver Bullock, D.O., State Board of Osteopathic Medicine
Lisa Boscola, State Senator