

Original: 2527

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2006 APR 21 AM 8:41

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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April 17, 2006

FIRST CLASS MAIL/E-MAIL

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

Dear Ms. Howell and Michlovitz:

Re: Proposed Athletic Trainer Regulations  
#16A - 4915

Please be advised that I represent the Pennsylvania Athletic Trainers' Society, Inc. ("PATS").

As you know, PATS was integrally involved in the passage of the laws in 2001, which transferred the jurisdiction of certified athletic trainers in the Commonwealth from the Physical Therapy Board to the State Board of Medicine and State Board of Orthopedic Medicine ("Boards").

PATS has also been involved in commenting on the development of the regulations as the Department of State's Boards considered the precursors to the proposed regulations.

As a result, PATS supports the Proposed Regulations in all but two minor aspects, both related to Temporary Certificates, a concept endorsed by PATS. PATS remains concerned by:

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1. The Reference to the Commission for Accreditation of the Allied Health Education Program ("CAAHEP"). In Section 18.507 (temporary certification), there is a reference to CAAHEP. This body has been the body involved in accreditation of athletic training programs. However, CAAHEP will no longer continue to do so because we have progressed to an independent accrediting body. As a result, we suggest that the language be rewritten to delete the reference to CAAHEP, so that the temporary Certificate progress does not end when programs are no longer accredited through that body and reference any approved athletic training education programs in accordance with the definition in §18.502/25.702, §18.505/25.705. and §18.506/25.707. Instead, the following should be inserted in : § 18.506/25.707 :

An applicant who is a graduate of an Athletic Training Program accredited by a national accrediting body for Athletic Training Education which is Board approved...

2. Termination of Temporary Certificates: We endorse the idea of temporary certification. We would simply suggest the individual holding a temporary certification report to the Board within thirty (30) days of the end of the temporary certification period whether s/he has passed, failed or not taken the certification examination within his/her temporary certification period.

With these two changes, PATS would wholeheartedly support the approval of the regulations.

Thank you for your courtesy in considering our requests. We also request a copy of the final regulations, and information related to any additional consideration. In the event that any additional information or discussion is desired, please feel free to contact PATS or myself. We appreciate your on-going cooperation during consideration of the regulations.

Sincerely,

  
Kathy Speaker MacNett

Cc: A.J. Duffy, ATC, PT, President of PATS  
Julie Emrhein, President Elect of PATS  
Michael Stephens, IRRRC