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"Number 1 In O&P Central Fabrication"

May 21, 2015

3062

Teresa Lazo

PA Board of Medicine

Dear Ms. Lazo:

2015 MAY 25 AM 10:15

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IRRC

I am writing this letter in response to the proposed changes being made to the PA Orthotics and Prosthetic law via "Final Annex".

I have been a prosthetic and orthotic technician in PA for over 35 years. I currently own a fabrication lab in Pa and provide devices (fabrication, technical services) to many orthotists, prosthetists, pedorthists practicing in PA. For over 25 years I managed the manufacturing (technical) operation of a large multi site orthotics and prosthetics practice in PA employing over 30 orthotists, prosthetists and pedorthists.

It was my belief this law was to regulate healthcare professionals known as orthotists, prosthetists, pedorthists and orthotic fitters and not manufacturers. Therefore, my first concern is with the definition of orthotic and prosthetic technician "**an unlicensed individual who under direct onsite supervision of an orthotist or prosthetist provides technical support to an orthotist or prosthetist and who may fabricate repair and maintain devices.**" This definition is categorically incorrect. A technician simple put is a manufacturer. (fabricator) There is no "may" about it. Technicians are NOT support personnel. Technicians work in a variety of settings and do not necessarily work under the supervision of an orthotist or prosthetist or in an orthotics and/or prosthetics practice. There are five orthotic and prosthetic technicians, including myself working in my lab and no orthotists or prosthetists. The technician receives a mold and a work order with specific instructions measurements etc from orthotists, prosthetists, pedorthists via the practice or company they work for. Most times there is little or no interaction with an orthotist, prosthetist or pedorthist. The device is manufactured according to those specifications and returned to the practice.

Similarly, when I managed the O & P operation at Lawalls, there were six sites or offices in PA. There were no technicians at five of the sites. Only one site performs the manufacturing and houses the technicians.. This is common in PA by multi site practices, who employ the majority of orthotists, prosthetists, and pedorthists. As lab manager I had over twenty technicians to supervise. They were not supervised by an orthotist or prosthetist. Manufacturing was done in the same fashion, by mold and/or work order with specifications provided. Technicians work in a variety of settings. To say they work on site under a orthotist or prosthetist can occur but does not in many cases. To perhaps give an example

of the relation of orthotists and prosthetists to technicians would be like a dentist who takes a mold for false teeth and then sends it to the dental lab. We , as technicians are in essence like the dental lab.

We make the product for the orthostist, prosthetist,pedorthist. We are not "assistants" to these healthcare professionals. We are providing a manufacturing service they use. Whether we are a lab within the same practice that employs the orthotist,prosthetist,pedorthist or an independent lab the relationship is the same.

We are separate from the clinical and adminstrative processes.

There are several fabricators (technicians) like myself not only in PA but across the entire US. Should you implement this terminology you will not only infringe on our businesses, (businesses that employ orthotic and prosthetic technicians,) but will create a devastating impact on the provision and manufacturing of custom orthotic and prosthetic devices, some of which are trademarked by specific manufacturers (some in Pa) Therefore if it is necessary to reference orthotic and prosthetic technicians in your law the more appropriate would be -" **an individual who manufacturers, fabricates, modifies, adjusts, repairs or maintains an orthotic or prosthetic device using a mold and or specifications provided to them by a licensed orthotist, prosthetist, or pedorthist"**

Simply put, that is exactly what we do.

Sincerely,



Gregory Michalowski

cc IRRC