

From: ST, RegulatoryCounsel
Sent: Wednesday, August 06, 2014 6:07 PM
To: Lazo, Teresa
Subject: FW: New Proposed Rules on Licensing - HB2242 - Act 104 of 2014.

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From: Irina Volk Rabovetsky [<mailto:irina.volk@gmail.com>]
Sent: Wednesday, August 06, 2014 3:58 PM
To: ST, RegulatoryCounsel
Subject: New Proposed Rules on Licensing - HB2242 - Act 104 of 2014.

Ms. Teresa Lazo, Board Counsel
State Board of Medicine
P.O. Box 2649
Harrisburg, PA 17

August 6, 2014

Dear Ms. Lazo

Many of my clients have identified areas of concern in the published proposed rules that will govern the issuance of licenses, regulate the practice of these professions, and discipline licensees.

Due to the new licensure requirement for an Orthotic Fitter, there is a need to include a clarification for Indirect Supervision. This will allow non-licensed professionals to provide orthotic fitter services under INDIRECT supervision of a licensee under the Act.

Please add the following clarification:

Indirect Supervision – non-licensed Orthotic Fitter is qualified to provide patient care independent of a licensee; however, the licensed supervisor must review and countersign all entries in the patient's clinical record within 15 working days following the delivery of care. The supervisor must be physically available for consultation within 60 minutes during the delivery of care.

Thank you. Please feel free to contact me with any follow-up questions or concerns.

Best,

Irina Rabovetsky, Esquire

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Irina Volk Rabovetsky, Esq.

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