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August 11, 2014

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

Via email: RA-STRegulatoryCounsel@pa.gov and tlazo@pa.gov

RE: Proposed Rulemaking (Prosthetists, Orthotists, Pedorthists, Orthotic Fitters)

Ms. Lazo:

Thank you for the opportunity to submit BOC's comments on the proposed rulemaking for the licensure of professionals in the fields of Orthotics, Prosthetics, Pedorthics, and Orthotic Fitting. As you know, BOC offers NCCA-accredited certification in all these areas, and we also accredit facilities where these professionals deliver care.

We are aware that you will be receiving a great deal of input from many sources. Some commenters asked to see our comments as we have developed them, and in some cases may have included our comments in theirs. In any event, these are the areas that BOC believe to be of greatest significance, and we felt it was important that you receive them from us, even if they may duplicate what you have heard from others.

1. The type of certification required is stated inconsistently throughout the rules:
 - a. 18.815.d, 18.825.d – "...shall demonstrate current National certification from an organization approved by the Board"
 - b. 18.834.b.4, 18.844.b.4 – "...holds current National certification as a [pedorthist, orthotic fitter] from a certification organization recognized by the Board."
 - c. 18.333.b.4, 18.843.b.4 – "...holds current National certification from the ABC or the BOC.)"
 - d. 18.814.8.4, 18.824.b.4 – "...credentialing organization whose certification program is accredited by NCCA."
 - e. 18.842.a -- "... or orthotic fitter certified by the ABC or the BOC."
 - f. 18.863.f -- "... by passing the certification examinations offered by either the ABC or the BOC. For prosthetists or orthotists, the applicable examinations are the ABC or BOC examinations required for initial certification. For pedorthists or orthotic fitters, the applicable examinations are the ABC or BOC pedorthist or orthotic fitter examination required for initial certification."
 - i. **Proposed solution:** In 18.802, the definitions for BOC and ABC could be amended as follows (edited text highlighted and in bold)

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1. ABC— American Board for Certification in Orthotics, Prosthetics & Pedorthics, Inc., an **National certification organization approved and recognized by the Board**, with certification programs accredited by the NCCA. The term includes a successor organization.
 2. BOC— Board of Certification/Accreditation International, Inc., an **National certification organization approved and recognized by the Board**, with certification programs accredited by the NCCA. The term includes a successor organization.
2. 18.832.a currently states "...shall practice only under the direct supervision of licensed Pedorthist." In our opinion, this individual could be supervised by a Pedorthist, Prosthetist, or Orthotist, as therapeutic footwear is in their scopes of practice. This would allow the candidate a larger pool of options. A precedent for including supervisors who have different certifications appears in 18.842, where an Orthotist is included as one of two options for supervision for an Orthotic Fitter's "patient fitting experience."
 3. The July 7 date needs to be changed throughout.
 4. 18.835.4 says that a Pedorthist needs 1,000 hours of "supervised patient fitting experience...." That is not the correct term for the experience needed by a Pedorthist. We would suggest: "supervised experience providing direct patient care in Pedorthics."

If you would like further information on these requested changes, please know that I would be happy to be of assistance.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Claudia Zacharias".

Claudia Zacharias, MBA, CAE
President & CEO