



3062

## FOOT COMFORT CENTER

9808 Bustleton Ave  
Philadelphia Pa 19115  
215-676-7463

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

2014 AUG 19 AM 10:26

RECEIVED  
IRRC

August 11, 2014

Dear Ms. Lazo,

Thank you for your dedication to improve Prosthetists, Orthotists, Pedorthists and Orthotic Fitters industry.

We are proud to say that Foot Comfort Center is one of the leaders of the industry. We see thousands of patients a year and accept most insurance companies in the area. When people have no medical insurance, we help them by extending discounts. Many doctors in the area would attest to our high quality, patient-friendly environment. Patients come back to us year after year and this is the best reward of all.

We would like to use this comment period and contribute to the published rules that will govern the law.

Based on our research of similar legislations of other States, we found that the State of Iowa has incorporated the concept of "Indirect Supervision" into their law.

Indirect supervision would imply that a licensed certified professional would be liable and responsible for any non-licensed Orthotic Fitters. This licensed professional would also be accountable for all training and formal education of non-licensed individuals. In a case when a licensed professional would not be present during the delivery of care, he/she must review and sign all medical records produced by non-licensed professionals. A licensed professional must readily be available for direct consultation within 15 minutes during the patient's visit in case direct supervision is required.

This clarification would make Orthotic Fitter services more readily available to patients, without diminishing quality of care.

Thank you,

Sofya Tamarkin, Board Certified Licensed Pedorthist, MBA

CC: State Senator Tommy Tomlinson

AUG 12 2014