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Kathy Cooper

From: Steven Chu <steven@valleypo.com>
Sent: Monday, February 01, 2016 2:15 PM
To: tlazo@pa.gov
Cc: IRRC; ST-MEDICINE@PA.GOV
Subject: Wishing to express concerns regarding final language of O & P Licensing Rules
Attachments: ABC Scope of Practice.pdf

2016 FEB -1 PM 2: 23

Attorney Lazo,

First, I thank you for your time and ear on this manner. I just received an email approximately an hour ago regarding the release the final draft of the Rules for the licensure for Orthotic, Prosthetic and Pedorthic professionals in the state of Pennsylvania.

As both a Licensed/Certified Prosthetist-Orthotist and a local Pennsylvania business owner within the state of Pennsylvania, I am concerned that some of the language will create undue hardship for us clinically by requiring a massive shift in the way O & P businesses in the state of Pennsylvania operate.

After reviewing the final edits of the Final Annex Copy Dated February 1, 2016, there remain some serious concerns regarding the wording and intent of the written law for our state professional licensure.

Please see the items below:

1. Page 7 – “Orthotic and prosthetic assistant” definition.
 - a. One of our two national certify boards already has designation “Certified Orthotic Assistant” and “Certified Prosthetic Assistant”. Both of these require that they pass both clinical/educational requirements and pass written certification exams. Would there be the ability to include this type of clinical position within our state licensure?

2. Page 10 – Prosthetist Provisional License.
 - a. Section 18.813A – In the second line it states, **“to provide direct patient care under DIRECT supervision as defined in 18.812(a).”**
 - i. My concern with this is **that is more restrictive** then the Scope of Practice for ABC Prosthetist Orthotist Residents as outlined in the attached ABC Scope of Practice on page 22 first paragraph under the title Resident. There it reads beginning in line 3, **“The care must be delivered initially under Direct Supervision, but will PROGRESS to Indirect Supervision as the resident’s competency increases and is documented** by the supervising ABC certified orthotist or prosthetist”.
 - ii. **This is the current standard utilized in the state of Pennsylvania by ABC Accredited facilities** and the proposed rules put the ability for our practices to continue to operate properly in jeopardy due to the “Direct Supervision wording the Final Annex Copy.
 1. I ask that the final Law wording be changed to reflect the ability to supervise utilizing “General Supervision” or “Indirect Supervision” as the clinical competency of our residents progresses. This will allow both for the proper clinical development of future licensed Prosthetists and Orthotists along with allowing us to continue to operate our businesses in a way similar to our current industry standards.

3. Page 15 – Same as above #2 but with regard to Orthotist Provisional License.

4. Page 26 – Delegation

- a. Section (A)(1) states that the **delegation should be consistent with the acceptable scope of practice** within the prosthetics, orthotics and pedorthic community in this commonwealth.
 - i. This is the basis for an industry standard of practice which is the background for the next areas.
- b. Section (A)(6) states that “the practioner delegating the task provides direct, onsite supervision of the tasks performed by a delegatee”
 - i. My concern is that there is no specification to the “type of tasks” that can be delegated.
 1. As this is a licensure issue regarding Clinical Care Areas, is it possible to insert or clarify this section by adding “clinical” or “related patient care tasks” to this sentence?
 - a. As an example: “The practioner delegating the task provides direct, onsite supervision of the clinical/direct patient care tasks performed by a delegatee.”
 - ii. We regularly, per industry/practice standards utilize technicians to perform **Non-patient related** fabrication tasks under our INDIRECT Supervision which allows for the best possible utilization of the individuals skill sets and improve business operational efficiency.
 1. Much like Optometrists do when sending out the fabrication of the actual lenses to a central fabrication company out of state which is off site from their practice and then upon return of the lenses, fit the glasses to the patient themselves. The patient contact is always with the Licensed medical professional and the ultimate clinical responsibility and outcome is still the Optometrists. I firmly believe that this is the intent of the rules but would ask that it be clarified and not be left so restrictive.
 2. I ask that you don’t allow the current Law and Rules to eliminate our ability to continue to operate in a fashion similar to the rest of the country with regards to our Clinical and Technical Operations.

I thank you again for your time and I hope to hear from you soon. I look forward to a response regarding these issues prior to the final implementation of the rule for our professional licensure.

Sincerely,

Steven Chu, CPO

Licensed -Certific Prosthetist-Orthotist

Practioner-Owner

Valley Prosthetics & Orthotics Inc.

www.valleypo.com

610-770-1515 (p)

steven@valleypo.com

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ORTHOTIC PROSTHETIC & PEDORTHIC



SCOPE OF PRACTICE

AMERICAN BOARD FOR CERTIFICATION IN
ORTHOTICS, PROSTHETICS AND PEDORTHICS, INC.

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Steven R. Whiteside, CO, FAAOP
Catherine A. Carter, ABC Executive Director

American Board for Certification in Orthotics, Prosthetics and Pedorthics, Inc.
330 John Carlyle Street, Suite 210
Alexandria, VA 22314
703-836-7114
www.abcop.org



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This edition supersedes all previous editions.

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Foreword

The Board of Directors of the American Board for Certification in Orthotics, Prosthetics and Pedorthics Inc., (ABC) developed this *Orthotic, Prosthetic and Pedorthic Scope of Practice* document for use by orthotic, prosthetic and pedorthic professionals, consumers, members of the rehabilitation team, health care decision makers and legislative and regulatory officials.

To write this consensus document, ABC used a variety of resources including:

- The previous ABC *Orthotics and Prosthetics Scope of Practice*
- The ABC *Practice Analysis Studies* for orthotists, prosthetists, pedorthists, orthotic fitters, mastectomy fitters, and technicians
- Curriculum from a sampling of orthotic, prosthetic, pedorthic and fitter educational programs

This *Orthotic, Prosthetic and Pedorthic Scope of Practice* document defines several aspects of the orthotic, prosthetic and pedorthic professions including the delineation of the scopes of practice and the specific responsibilities of ABC credentialed individuals.

The practice of orthotics, prosthetics and pedorthics occurs in various settings, including independent private orthotic, prosthetic or pedorthic practices, hospitals, inpatient and outpatient rehabilitation facilities, rural outreach clinics, home health settings, short term nursing facilities and long term care settings. ABC credentialed professionals play a critical role in the rehabilitation of individuals in need of orthotic, prosthetic or pedorthic care.

Any scope of practice document should be revised periodically, and it is the intent of ABC to revise this document as the practice of orthotics, prosthetics and pedorthics evolves.

This publication represents the shared efforts of many dedicated individuals. ABC is grateful for the commitment of the committee members and staff that devoted their time and effort to this project.

Donald D. Virostek, CPO
President

ABC Credentials

The American Board for Certification in Orthotics, Prosthetics and Pedorthics, Inc. (ABC) establishes and promotes the highest standards of organizational and clinical performance in the delivery of orthotic, prosthetic and pedorthic care. ABC advances the competency of practitioners, promotes the quality and effectiveness of orthotic, prosthetic and pedorthic care and maintains the integrity of the profession.

ABC orthotist, prosthetist, pedorthist, fitter, assistant and technician certification are the designations given to those individuals who have met ABC's extensive education and clinical training requirements and who have passed specific examinations that are based on a comprehensive practice analysis of the orthotic, prosthetic and pedorthic professions. The examinations measure the candidate's knowledge of orthotics, prosthetics and pedorthics, their analytical and problem solving skills as well as clinical, patient management and communication skills. ABC orthotist, prosthetist, pedorthist, assistant, fitter and technician credentials are the profession's highest standards for individuals providing patient care and technical services.

ABC awards the following credentials:

- ABC Certified Orthotist (CO)
- ABC Certified Prosthetist (CP)
- ABC Certified Prosthetist/Orthotist (CPO)
- ABC Certified Pedorthist (C.Ped.)
- ABC Certified Fitter-Orthotics (CFo)
- ABC Certified Fitter-Mastectomy (CFm)
- ABC Certified Fitter-Orthotic Mastectomy (CFom)
- ABC Certified Fitter-Therapeutic Shoes (CFts)
- ABC Certified Orthotic Assistant (COA)
- ABC Certified Prosthetic Assistant (CPA)
- ABC Certified Prosthetic-Orthotic Assistant (CPOA)
- ABC Certified Orthotic Technician (CTO)
- ABC Certified Prosthetic Technician (CTP)
- ABC Certified Prosthetic-Orthotic Technician (CTPO)

Delineation of Scopes of Practice

ABC Certified Orthotist, Prosthetist, or Prosthetist/Orthotist

An ABC certified orthotist and/or prosthetist is a health care professional who is specifically educated and trained to manage comprehensive orthotic and/or prosthetic patient care. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up and practice management.

Orthotic care may include, but is not limited to, patient evaluation, orthosis design, fabrication, fitting and modification to treat a neuromusculoskeletal disorder or acquired condition. This includes the provision of partial foot prostheses for transmetatarsal and more distal amputations..

Prosthetic care may include, but is not limited to, patient evaluation, prosthesis design, fabrication, fitting and modification to treat limb loss for purposes of restoring physiological function and/or cosmesis.

Orthotic and/or prosthetic care does not include independent provision of invasive procedures, including, but not limited to, injections and initial application or replacement of skull pins.

The orthotist and/or prosthetist certified by ABC is bound by the ABC Code of Professional Responsibility which is enforced by a Professional Discipline program. The certified orthotist/prosthetist is obligated to support and conform to professional responsibilities that promote and assure the overall welfare of the patient and the integrity of the profession. The time limited certification expires without compliance with requirements of the Mandatory Continuing Education program. The practice of an ABC certified orthotist and/or prosthetist includes, but is not limited to:

- 1) Assessment of patients with impairment of human movement or musculoskeletal abnormalities that would impede their ability to participate in their social environment or other activities in order to determine a functional intervention. Patient assessment may include, but is not limited to, the evaluation of:
 - anthropometric data
 - cognition
 - circulation
 - skin integrity
 - protective sensation
 - pain
 - central and peripheral nerve integrity
 - respiratory capacity
 - biomechanics

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- gait analysis including temporal and spatial assessment
 - range of motion
 - muscle strength
 - posture and balance
 - proprioception
 - orthotic and/or prosthetic requirements
 - myoelectric activity and potential for use of Functional Electrical Stimulation and/or Neuroprosthetics
 - activities of daily living
 - environmental barriers including social, home, and work reintegration
 - the need for physical and occupational therapy modalities
- 2) Formulation of a treatment plan based upon a comprehensive assessment to design an intervention to alleviate limitations and enhance function. Orthotic and prosthetic treatment includes, but is not limited to:
- verification of prescription/documentation
 - evaluation of the prescription rationale
 - a needs assessment based on patient and/or caregiver input
 - development of functional goals
 - analysis of structural and design requirements
 - assessment of potential physical and occupational therapy requirements
 - consultation with and/or referral to other health care professionals
- 3) Implementation of the orthotic and/or prosthetic treatment plan includes, but is not limited to:
- acquisition of anthropometric data
 - modification and/or rectification of anthropometric data
 - preparatory care
 - material selection
 - fabrication of orthoses and/or prostheses
 - prototype development including evaluative wear
 - structural evaluation
 - diagnostic fitting
 - assessment of intervention
 - functional exercise
 - gait training
 - functional training (both self care and work related)
 - patient education and instruction
 - supervision of the provision of care

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- 4) Utilization of a follow-up treatment plan that ensures successful orthotic and/or prosthetic outcomes, patient health and quality of life which includes, but is not limited to:
 - documentation of functional changes
 - formulation of modifications to ensure successful outcomes
 - reassessment of patient expectations
 - reassessment of treatment objectives
 - development of long term treatment plan
 - confirmation of patient education and instruction
 - evidence based practice

 - 5) Compliance with practice management plans to develop and document policies and procedures to ensure patient protection which includes, but is not limited to:
 - adherence to applicable local, state and federal laws and regulations
 - following patient care guidelines and procedures
 - maintaining a safe and professional environment for patient care
 - comprehension of claims development and submission

 - 6) Promotion of competency and enhancement of orthotic and/or prosthetic professional practice to contribute to the profession's body of knowledge includes, but is not limited to participation in:
 - continuing education
 - training of residents/students
 - clinical research
 - evidence based studies
 - promotion of public awareness of the orthotic and/or prosthetic profession
 - consumer organizations, governmental and non-governmental organizations

ABC Certified Pedorthist

An ABC certified pedorthist is a health care professional who is specifically educated and trained to manage comprehensive pedorthic patient care. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up and practice management. An ABC certified pedorthist fits, fabricates, adjusts, or modifies devices which reflect his/her education and training.

The profession of pedorthics is the provision of patient care and services by or under the direction and supervision of an ABC certified pedorthist to provide the application of a pedorthic device for the prevention or amelioration of painful and/or disabling conditions of the foot and ankle. A prescription is required for any pedorthic device, modification, and/or prefabricated below the knee orthosis addressing a medical condition that originates at the ankle or below.

“Pedorthic devices” means therapeutic shoes, shoe modifications made for therapeutic purposes, partial foot prostheses for transmetatarsal and more distal amputations, and foot orthoses. It also includes subtalar-control foot orthoses (SCFO) designed to manage the function of the anatomy by primarily controlling the range of motion of the subtalar joint. Excluding footwear, the proximal height of a custom pedorthic device does not extend beyond the junction of the gastrocnemius and the Achilles tendon. Pedorthic devices do not include non-therapeutic inserts or footwear regardless of method of manufacture; unmodified, non-therapeutic over-the-counter shoes; or prefabricated foot care products. “Therapeutic” devices address a medical condition, diagnosed by a prescribing medical professional, while “non-therapeutic” devices do not address a medical condition.

The pedorthist certified by ABC is bound by the ABC Code of Professional Responsibility which is enforced by a Professional Discipline program. The certified pedorthist is obligated to support and conform to professional responsibilities that promote and assure the overall welfare of the patient and the integrity of the profession. The time limited certification expires without compliance with the Mandatory Continuing Education program. The practice of an ABC certified pedorthist includes but is not limited to:

- 1) Assessment of patients with impairment of human movement or musculoskeletal abnormalities that would otherwise impede their ability to participate in their social environment or other activities in order to determine a functional intervention. Pedorthic patient assessment may include, but is not limited to, the evaluation and documentation of:
 - anthropometric data
 - cognition
 - circulation
 - skin integrity
 - protective sensation
 - pain
 - peripheral nerve integrity

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- respiratory capacity
 - biomechanics
 - gait analysis including temporal and spatial assessment
 - range of motion
 - muscle strength
 - posture and balance
 - proprioception
 - pedorthic requirements
 - environmental barriers including social, home, and work reintegration
- 2) Formulation of a treatment plan based upon a comprehensive assessment to design an intervention to alleviate limitations and enhance function. Pedorthic treatment includes, but is not limited to:
- verification of prescription/documentation
 - evaluation of the prescription rationale
 - a needs assessment based on patient and/or caregiver input
 - development of functional goals
 - analysis of structural and design requirements
 - consultation with and/or referral to other health care professionals
- 3) Implementation of the pedorthic treatment plan includes but is not limited to:
- acquisition of anthropometric data
 - modification and/or rectification of anthropometric data
 - material selection
 - fabrication of pedorthic devices
 - device structural evaluation
 - diagnostic fitting
 - gait training
 - assessment of intervention for appropriate outcomes
 - patient education and instruction
 - supervision of the provision of care
- 4) Utilization of a follow-up treatment plan that ensures successful pedorthics outcomes, patient health and quality of life which includes, but is not limited to:
- documentation of functional changes
 - formulation of modifications to ensure successful outcomes
 - reassessment of patient expectations
 - reassessment of treatment objectives
 - development of long term treatment plan
 - confirmation of patient education and instruction
 - evidenced based practice

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- 5) Compliance with practice management plans to develop and document policies and procedures to ensure patient protection includes, but is not limited to:
- adherence to applicable local, state and federal laws and regulations
 - following patient care guidelines and procedures maintaining a safe and professional environment for patient care
 - comprehension of claims development and submission
- 6) Promotion of competency and enhancement of pedorthic professional practice to contribute to the profession's body of knowledge includes, but is not limited to participation in:
- training of residents/students
 - continuing education
 - clinical research
 - evidence based studies
 - promotion of public awareness of the pedorthic profession
 - consumer organizations, governmental and non-governmental organizations

ABC Certified Fitter-Orthotics:

An ABC certified fitter-orthotics is a health care professional who is specifically educated and trained in the provision of certain orthoses. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up and practice management.

An ABC certified fitter-orthotics is competent to practice orthotics within a scope of practice that is specific to fitting certain custom fitted, prefabricated and off-the-shelf orthoses as described below:

- Cervical orthoses, except those used to treat an unstable cervical condition
- Prefabricated orthoses for the upper and lower extremities, except for the following: those used in the initial and/or acute treatment of long bone fractures and dislocations, therapeutic (diabetic) shoes/inserts and functional electrical stimulation orthoses (e.g. myo-orthosis, neuroprosthesis)
- Prefabricated spinal orthoses, except those used in the treatment of scoliosis or unstable spinal conditions, or halo cervical orthoses
- Pressure gradient garments
- Trusses

The ABC certified fitter-orthotics is bound by the ABC Code of Professional Responsibility which is enforced by a Professional Discipline program. The certified fitter-orthotics is obligated to support and conform to professional responsibilities that promote and assure the overall welfare of the patient and the integrity of the profession. The time limited certification expires without compliance with the Mandatory Continuing Education program. The practice of an ABC certified fitter-orthotics includes, but is not limited to:

- 1) Assessment of prescription or patient's needs for prefabricated orthoses includes, but is not limited to, the evaluation of the following:
 - physical assessment
 - circulation
 - skin integrity
 - posture
 - orthotic requirements
- 2) Formulation of a treatment plan based upon an assessment to alleviate limitations and enhance function. The orthotic fitter's treatment includes, but is not limited to:
 - verification of prescription/documentation
 - consultation with and/or referral to other health care professionals
- 3) Implementation of the orthotic fitter's treatment plan includes, but is not limited to:
 - acquisition of physical assessment data
 - adjustments to accommodate individual anatomic contours
 - structural evaluation
 - patient education and instruction

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- 4) Utilization of a follow-up treatment plan that ensures successful orthotic outcomes, patient health and quality of life which includes, but is not limited to:
 - documentation of functional changes
 - formulation of modifications to ensure successful outcomes
 - confirmation of patient education and instruction

 - 5) Compliance with practice management plans to develop and document policies and procedures to ensure patient well being which includes, but is not limited to:
 - adherence to applicable local, state and federal laws and regulations
 - following patient care guidelines and procedures
 - maintaining a safe and professional environment for patient care
 - comprehension of claims development and submission

 - 6) Promotion of competency and enhancement of orthotic professional practice to contribute to the profession's body of knowledge includes, but is not limited to, participation in:
 - continuing education
 - promotion of public awareness of the orthotic profession
 - consumer organizations, governmental and non-governmental organizations

ABC Certified Fitter-Mastectomy

An ABC certified fitter-mastectomy is a health care professional who is specifically educated and trained in the provision of breast prostheses and post-mastectomy items and services. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up and practice management.

The ABC certified fitter-mastectomy is bound by the ABC Code of Professional Responsibility which is enforced by a Professional Discipline program. The certified fitter-mastectomy is obligated to support and conform to professional responsibilities that promote and assure the overall welfare of the patient and the integrity of the profession. The time limited certification expires without compliance with the Mandatory Continuing Education program. The practice of an ABC certified mastectomy fitter includes, but is not limited to:

- 1) Assessment of specific prescription or patient's needs for breast prostheses as it relates to or includes, but is not limited to, the evaluation of the following:
 - physical assessment
 - circulation
 - skin integrity
 - posture and balance
 - mastectomy prosthetic requirements
- 2) Formulation of a treatment plan based upon an assessment to alleviate limitations and enhance function. The mastectomy fitter's treatment includes, but is not limited to:
 - verification of prescription/documentation
 - a needs assessment based on patient and/or caregiver input
 - analysis of design requirements
 - consultation with and/or referral to other health care professionals
- 3) Implementation of the mastectomy fitter's treatment plan includes, but is not limited to:
 - acquisition of physical assessment data
 - material selection
 - diagnostic fitting
 - adjustments to accommodate individual anatomic contours
 - patient education and instruction
- 4) Utilization of a follow-up treatment plan that ensures successful mastectomy prosthetic outcomes, patient health and quality of life which includes but is not limited to:
 - documentation of any changes in patient's condition
 - formulation of modifications to ensure successful outcomes
 - confirmation of patient education and instruction

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- 5) Compliance with practice management plans to develop and document policies and procedures to ensure patient well being which includes, but is not limited to:
- adherence to applicable local, state and federal laws and regulations
 - following patient care guidelines and procedures
 - maintaining a safe and professional environment for patient care
 - comprehension of claims development and submission
- 6) Promotion of competency and enhancement of post-mastectomy professional practice to contribute to the profession's body of knowledge includes, but is not limited to, participation in:
- continuing education
 - promotion of public awareness of the post-mastectomy profession
 - consumer organizations, governmental and non-governmental organizations

ABC Certified Fitter-Therapeutic Shoes

An ABC certified fitter-therapeutic shoes is a health care professional who is specifically educated and trained to provide non-custom therapeutic shoes and non-custom multi-density inserts. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up and practice management.

The ABC certified fitter-therapeutic shoes is bound by the ABC Code of Professional Responsibility which is enforced by a Professional Discipline program. The certified fitter-therapeutic shoes is obligated to support and conform to professional responsibilities that promote and assure the overall welfare of the patient and the integrity of the profession. The time limited certification expires without compliance with the Mandatory Continuing Education program. The practice of an ABC certified fitter-therapeutic shoes includes, but is not limited to:

- 1) Assessment of specific prescription or patient's needs for therapeutic shoes as it relates to or includes, but is not limited to, the evaluation of the following:
 - physical assessment
 - circulation
 - skin integrity
 - protective sensation
 - pain
 - therapeutic shoe requirements
 - environmental barriers including social, home, and work reintegration
- 2) Formulation of a treatment plan based upon an assessment to alleviate limitations and enhance function. The therapeutic shoe fitter's practice includes, but is not limited to:
 - verification of prescription/documentation
 - analysis of shoe construction needs and design requirements
 - consultation with and/or referral to other health care professionals
- 3) Implementation of the therapeutic shoe fitter's treatment plan includes, but is not limited to:
 - measuring patient for shoes
 - material selection
 - shoe fit evaluation
 - minor adjustments to accommodate individual anatomic contours
 - patient education and instruction
- 4) Utilization of a follow-up treatment plan that ensures successful outcomes, patient health and quality of life which includes, but is not limited to:
 - documentation of functional changes
 - minor adjustments to the fit of the shoe to ensure successful outcomes
 - confirmation of patient education and instruction

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- 5) Compliance with practice management plans to develop and document policies and procedures to ensure patient well being which includes, but is not limited to:
- adherence to applicable local, state and federal laws and regulations
 - following patient care guidelines and procedures
 - maintaining a safe and professional environment for patient care
 - understanding claims development and submission
- 6) Promotion of competency and enhancement of professional practice to contribute to the profession's body of knowledge includes, but is not limited to, participation in:
- continuing education
 - promotion of public awareness of the profession
 - consumer organizations, governmental and non-governmental organizations

ABC Certified Orthotic and/or Prosthetic Assistant

An ABC certified assistant is an individual educated and trained to participate in comprehensive orthotic and/or prosthetic care while under the supervision of an ABC certified orthotist and/or ABC certified prosthetist.

Certified assistants, under the supervision of an ABC certified orthotist and/or ABC certified prosthetist may perform orthotic and/or prosthetic procedures and related tasks in the management of patient care. The initial evaluation and formulation of the treatment plan is the responsibility of the supervising orthotist and/or prosthetist. The certified assistant may also fabricate, repair and maintain orthoses and/or prostheses. ABC certified assistants may not use their credentials as independent providers of patient care.

The certified assistant is bound by the ABC Code of Professional Responsibility, which is enforced by a Professional Discipline program. The certified assistant is obligated to support and conform to professional responsibilities that promote and assure the overall welfare of the patient and the integrity of the profession. The time limited certification expires without compliance with the Mandatory Continuing Education program. The practice of an ABC certified orthotic/prosthetic assistant includes, but is not limited to:

- 1) Participation in the assessment of patients with impairment of human movement or musculoskeletal abnormalities that would impede their ability to participate in their social environment or other activities in order to determine a functional intervention. Patient assessment may include but is not limited to the evaluation of:
 - anthropometric data
 - cognition
 - circulation
 - skin integrity
 - protective sensation
 - pain
 - respiratory capacity
 - range of motion
 - muscle strength
 - posture and balance
 - proprioception
 - orthotic and prosthetic requirements
 - environmental barriers including social, home and work reintegration

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- 2) Implementation of the established orthotic or prosthetic treatment plan which includes, but is not limited to:
 - acquisition of anthropometric data
 - modification and/or rectification of physical data
 - preparatory care
 - material selection
 - fabrication
 - prototype development including evaluative wear
 - structural evaluation
 - diagnostic fitting
 - assessment of intervention for appropriate outcomes
 - gait training
 - functional training (both self care and work related)
 - patient education and instruction

 - 3) Utilization of a follow-up treatment plan that ensures successful orthotic and/or prosthetic outcomes, patient health and quality of life which includes, but is not limited to:
 - documentation of functional changes
 - formulation of modifications within the established plan of care to ensure successful outcomes
 - reassessment of patient expectations
 - reassessment of treatment objectives
 - assist in development of long term treatment plan
 - confirmation of patient education and instruction
 - evidenced based practice

 - 4) Compliance with practice management plans to develop and document policies and procedures to ensure patient well being which includes, but is not limited to:
 - adherence to applicable local, state and federal laws and regulations
 - following patient care guidelines and procedures
 - maintaining a safe and professional environment for patient care
 - understanding claims development and submission

 - 5) Promotion of competency and enhancement of orthotic and/or prosthetic professional practice to contribute to the profession's body of knowledge includes, but is not limited to, participation in:
 - continuing education
 - training of residents/students
 - clinical research
 - evidence based studies
 - promotion of public awareness of the orthotic and/or prosthetic profession
 - consumer organizations, governmental and non-governmental organizations

Certified Orthotic and/or Prosthetic Technician

An ABC certified technician is an individual trained and qualified to assist an ABC credentialed individual by providing technical support. ABC certified technicians may not use their credentials as independent providers of patient care. The certified technician fabricates, repairs and maintains orthoses and/or prostheses. The certified technician is proficient with current fabricating techniques, familiar with material properties and skilled in the use of appropriate equipment.

The certified technician is bound by the ABC Code of Professional Responsibility, which is enforced by a Professional Discipline program. The certified technician is obligated to support and conform to professional responsibilities that promote and assure the overall welfare of the patient and the integrity of the profession. The time limited certification expires without compliance with the Mandatory Continuing Education program. The practice of an ABC certified orthotic and/or prosthetic technician includes, but is not limited to:

- 1) Assessment of orthotic and/or prosthetic technical requirements. Technical assessment may include but is not limited to the evaluation of the following information:
 - physical assessment data
 - range of motion requirements
 - orthotic/prosthetic requirements
 - material selection
 - component application
 - structural analysis
 - device specific function

- 2) Formulation of fabrication requirements within the established treatment plan. This formulation includes, but is not limited to:
 - verification of documentation
 - consultation with manufacturing professionals as required
 - analysis of structural and design needs for implementation
 - development of device specific functional goals
 - consultation with clinicians and peers

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- 3) Implementation of the fabrication requirements includes, but is not limited to:
 - application of physical data
 - modification and/or rectification of physical data
 - material selection
 - fabrication
 - structural evaluation
 - compliance with component selection and manufacturer recommendations
 - assessment of intervention for appropriate outcomes
 - 4) Utilization of a follow-up treatment plan that ensures successful fabrication outcomes which includes, but is not limited to:
 - documentation of structural changes
 - formulation of modifications to ensure successful outcomes
 - development of long term service plan
 - 5) Compliance with practice management plans, policies and procedures which includes, but is not limited to:
 - adherence to applicable local, state and federal laws and regulations
 - following patient care guidelines and procedures
 - maintaining a safe and professional environment
 - application of manufacturer's guarantees, and conditions of use
 - performing applicable machine maintenance and calibration
 - maintaining applicable records of components, machines and other necessary equipment
 - 6) Promotion of competency and enhancement of professional practice to contribute to the profession's body of knowledge includes, but is not limited to participation in:
 - continuing education
 - training of residents and students
 - evidence based studies
 - promotion of public awareness of the profession
 - consumer organizations, governmental and non-governmental organizations

Definitions of Common Terms

ABC

The American Board for Certification in Orthotics, Prosthetics and Pedorthics, Inc. (ABC) establishes and promotes the highest standards of organizational and clinical performance in the delivery of orthotic, prosthetic and pedorthic care. It is the mission of ABC to advance the competency of practitioners, promote the quality and effectiveness of orthotic, prosthetic and pedorthic care and maintain the integrity of the profession.

Anthropometric

Pertaining to the measurement of the size, weight and proportion of the human body.

CAAHEP

The Commission on Accreditation of Allied Health Education Programs (CAAHEP) is a nationally recognized nonprofit organization that accredits educational programs in allied health disciplines.

CAD/CAM

Computer-aided design/computer-aided manufacture.

Cognition

The operation of the mind by which we become aware of objects of thought or perception; it includes aspects of perceiving, thinking and remembering.

Custom Fabricated Device

An orthosis, prosthesis or pedorthic device fabricated to comprehensive measurements and/or a mold or patient model for use by a patient in accordance with a prescription and which requires clinical and technical judgment in its design, fabrication and fitting.

Custom Fitted Device

A prefabricated orthosis or pedorthic device which is manufactured in quantity without a specific patient in mind. The device may be supplied as separate prefabricated components that require some assembly and/or fitting and adjustment. These orthoses or pedorthic devices must be trimmed, bent, molded (with or without heat), or otherwise modified for use by a specific patient.

Exam Candidate (Orthotist or Prosthetist)

An Exam Candidate is an individual who has successfully completed an NCOPE accredited residency in a comprehensive orthotic and/or prosthetic accredited facility, has met all eligibility criteria and has applied for and been accepted to take the ABC orthotist or prosthetist certification exam. While these individuals are within their official exam eligibility window they can continue to provide orthotic or prosthetic services under Indirect Supervision.

Functional Electrical Stimulation

Functional electrical stimulation provides a low level electrical current which results in the movement of a body part to accomplish a specific task. These systems impart transcutaneous stimulation of nerve and/or muscle groups.

Mandatory Continuing Education

ABC credentialed individuals are required to maintain competency through mandatory continuing education by earning professional continuing education credits.

Mastectomy Fitter

A health care professional who is specifically educated and trained in the provision of breast prostheses and post-mastectomy services. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up and practice management.

NCOPE

The National Commission on Orthotic and Prosthetic Education (NCOPE) is the accreditation body for the orthotic and prosthetic professions and the approval body for the pedorthic profession. NCOPE works in cooperation with CAAHEP. NCOPE's primary mission is to ensure education and/or residency programs meet minimum standards of quality to prepare individuals to enter these professions.

Non-custom Therapeutic Shoes

Shoes that meet the criteria of the Medicare Therapeutic Shoe Bill and that match the diabetic shoe descriptor, i.e. "off the shelf depth-inlay shoe manufactured to accommodate multi-density insert(s)"; shoes that are not custom fabricated from a mold of the patient's foot.

Non-custom Multi-Density Inserts

Inserts that meet the criteria of the Medicare Therapeutic Shoe Bill that match the diabetic insert descriptor, i.e. "multi-density insert, direct formed, molded to foot after external heat source of 230 degrees Fahrenheit or higher, total contact with patient's foot, including arch, base layer minimum of ¼ inch material of Shore A 35 durometer or 3/16 inch of Shore A durometer (or higher), prefabricated"; inserts that are not custom fabricated from a mold of the patient's foot.

Neuroprosthetics

A discipline related to neuroscience and biomedical engineering concerned with developing neural prostheses, artificial devices to replace or improve the function of an impaired nervous system.

Off-the-Shelf Device

A prefabricated orthosis sized and/or modified for interim, evaluative or short term use by the patient, in accordance with a prescription and which does not require clinical judgment and substantive alteration for appropriate use.

Orthosis

A custom designed, custom fabricated, custom fitted, prefabricated and/or modified device to treat a neuromusculoskeletal disorder or acquired condition.

Orthotic Fitter

A health care professional who is specifically educated and trained in the provision of prefabricated orthoses, with the exception of those orthoses noted in this publication. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up and practice management.

Orthotist

A health care professional who is specifically educated and trained to manage comprehensive orthotic patient care. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up and practice management.

Pedorthic Device

Pedorthic devices are therapeutic shoes, shoe modifications made for therapeutic purposes, below the ankle partial foot prostheses, and foot orthoses. It also includes subtalar-control foot orthoses (SCFO) designed to manage the function of the anatomy by primarily controlling the range of motion of the subtalar joint. Excluding footwear, the proximal height of a custom pedorthic device does not extend beyond the junction of the gastrocnemius and the Achilles tendon. Pedorthic devices do not include non-therapeutic inlays or footwear regardless of method of manufacture; unmodified, non-therapeutic over-the-counter shoes; or prefabricated foot care products. "Therapeutic" devices address a medical condition, diagnosed by a prescribing medical professional, while "non-therapeutic" devices do not address a medical condition.

Pedorthist

A health care professional who is specifically educated and trained to manage comprehensive pedorthic patient care. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up and practice management. An ABC Certified Pedorthist (C.Ped.) fits, fabricates, adjusts, or modifies devices which reflect his/her education and training.

Prefabricated Device

A prefabricated device is one which is manufactured in quantity without a specific patient in mind. The device may be supplied as separate prefabricated components that may require some assembly and/or fitting and adjustment. These devices may require some trimming, bending, molding (with or without heat), or modification for use by a specific patient.

Proprioception

Perception mediated by the sensory nerve ending in muscles, tendons, and joints that provides a sense of the body's position by responding to stimuli from within the body.

Prosthesis

A custom designed, fabricated, fitted and/or modified device to treat partial or complete limb loss for purposes of restoring physiological function and/or cosmesis.

Prosthetist

A health care professional who is specifically educated and trained to manage comprehensive prosthetic patient care. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up and practice management.

Residency

A one-year NCOPE approved supervised program in a comprehensive orthotic and/or prosthetic accredited facility. This program allows the resident to acquire practical clinical training in orthotics and/or prosthetics which is part of the overall education required for ABC Orthotist and/or Prosthetist Certification.

Resident

An orthotic or prosthetic student who is actively fulfilling their residency requirements at an NCOPE accredited residency site. During the course of residency training, students should progress from observing to providing direct patient care. The care must be delivered initially under Direct Supervision, but will progress to Indirect Supervision as the resident's competency increases and is documented by the supervising ABC certified orthotist or prosthetist.

Subtalar-Control Foot Orthosis (SCFO)

A lower extremity orthosis designed to manage the function of the anatomy distal to the ankle joint by primarily controlling the range of motion of the subtalar joint. The proximal height of a SCFO does not extend beyond the junction of the gastrocnemius and the Achilles tendon. A SCFO is a method of treatment for conditions related to the foot demanding additional surface area to control forces.

Supervision and Privileging of a Credentialed Caregiver

Privileging of credentialed individuals to provide services beyond their defined scope of practice must ensure appropriate, effective, ethical and safe delivery of patient care. The credentialed caregiver may be privileged, under Indirect Supervision, to provide patient care beyond the scope of their credential based on Written Objective Criteria.

Privileging of a credentialed caregiver is limited to the following:**Prosthetics:**

Orthotists and Prosthetic Assistants who are credentialed by a nationally recognized Orthotic, Prosthetic and Pedorthic certifying board or are licensed¹, if applicable, may be privileged based on Written Objective Criteria to provide prosthetic care.

Orthotics:

Prosthetists, Pedorthists, Orthotic Assistants and Orthotic Fitters who are credentialed by a nationally recognized Orthotic, Prosthetic and Pedorthic certifying board or are licensed, if applicable, may be privileged based on Written Objective Criteria to provide orthotic care.

Pedorthics:

Orthotic Assistants, Orthotic Fitters and Therapeutic Shoe Fitters who are credentialed by a nationally recognized Orthotic, Prosthetic and Pedorthic certifying board or are licensed, if applicable, may be privileged based on Written Objective Criteria to provide pedorthic care.

ABC credentialed technicians may be privileged based on Written Objective Criteria to provide services, in the discipline they are credentialed, in the Implementation of the Treatment Plan and Follow-up domains under Indirect Supervision.

The orthotic, prosthetic or pedorthic patient care services provided by the privileged credentialed caregiver which are beyond their scope of practice must not exceed ABC's defined scope of practice for Orthotists, Prosthetists or Pedorthists. The Supervisor must review the results of care and the documentation of the services rendered by the supervised individual

¹ Any privileging must be in compliance with all state laws or rules that apply to the provision of orthotic, prosthetic or pedorthic items and services.

and is responsible for countersigning within 15 days all entries by the caregiver in the patient's clinical record. The Supervisor is responsible for all services that the caregiver is being privileged to provide.

Supervision and Privileging of a Non-Credentialed Caregiver

Supervision and privileging of a non-credentialed caregiver must ensure appropriate, effective, ethical and safe delivery of patient care. The non-credentialed caregiver may be privileged to assist in the provision of patient care based on Written Objective Criteria. In situations where either prosthetic, custom fabricated orthotic or custom fit-high* orthotic items are being provided the initial patient assessment, formulation of the treatment plan and the final fitting and delivery must be done under Direct Supervision (see Supervision Matrix below). For all other levels of care the non-credentialed caregiver is privileged under Indirect Supervision, where the Supervisor must be available for consultation throughout the patient care process. Please see the Exam Candidate definition for information regarding individuals who have completed an NCOPE accredited orthotic and/or prosthetic Residency.

The orthotic, prosthetic or pedorthic patient care services provided by the non-credentialed caregiver must not exceed ABC's defined scope of practice for Orthotists, Prosthetists or Pedorthists.

The Supervisor must review the results of care and the documentation of the services rendered by the non-credentialed caregiver and is responsible for countersigning within 15 days all entries by the caregiver in the patient's clinical record. The supervisor is responsible for all acts performed by the privileged individual.

Supervision Matrix for Prosthetic, Custom Fabricated and Custom Fit-High* Orthotic Levels of Care

Domain	Non-Credentialed Caregiver
Patient Assessment	Direct
Formulation of Treatment Plan	Direct
Implementation of Treatment Plan	Indirect
Final Fitting and Delivery	Direct
Follow-up Care	Indirect

*Custom Fit-High orthotic care, for the purposes of this document, is defined as the provision of any prefabricated orthoses that are excluded from the ABC certified orthotic fitter scope of practice [i.e. cervical orthoses used to treat an unstable cervical condition, orthoses used in the initial and/or acute treatment of long bone fractures and dislocations, therapeutic (diabetic) shoes/inserts, functional electrical stimulation orthoses (e.g. myo-orthosis, neuroprosthesis) and spinal orthoses used in the treatment of scoliosis or unstable spinal conditions, including halo cervical orthoses]

Supervision

Direct Supervision requires the supervising credentialed individual to be available in real time for consultation throughout the patient care process and to be able to assess the care being provided by visual means (i.e., physically present, live video, web cam, or by other means of live visual technology). The supervisor must review the results of care and the documentation of the services rendered by the supervised individual and is responsible for countersigning within 15 days all entries by the caregiver in the patient's clinical record.

Indirect Supervision does not require the supervising credentialed individual to be on-site however they must be available for consultation throughout the patient care process. The supervisor must review the results of care and the documentation of the services rendered by the supervised individual and is responsible for countersigning within 15 days all entries in the patient's clinical record.

Supervisor

The supervisor is the designated credentialed Orthotist, Prosthetist or Pedorthist who oversees and is solely responsible for the delivery of appropriate, effective, ethical and safe orthotic, prosthetic and/or pedorthic patient care. The supervisor may oversee patient care services only in the discipline(s) they are credentialed and within the ABC defined scope of practice.

Technician

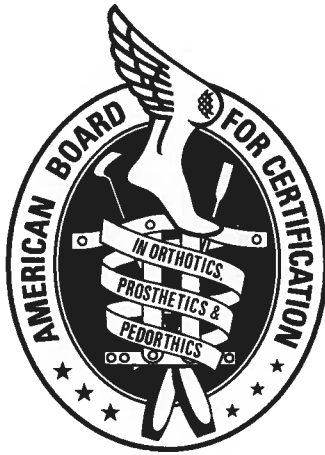
An individual trained and qualified to assist an ABC credentialed individual by providing technical support. The technician fabricates, repairs and maintains orthoses and prostheses. The technician is proficient with current fabricating techniques, familiar with material properties and skilled in the use of appropriate equipment.

Therapeutic Shoe Fitter

A health care professional who is specifically educated and trained to provide non-custom therapeutic shoes and non-custom multi-density inserts. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up and practice management.

Written Objective Criteria

Written objective criteria is the means by which a privileged caregiver's ability to provide a specific patient care service has been assessed and documented. The structure and mechanism of how the caregiver has gained the necessary knowledge and skills to be able to provide a specific patient care service must be clear and related to the diagnosis involved and the orthosis or prosthesis being provided. This documentation may take different forms including, but not limited to, proof of completion of continuing education courses related to a particular diagnosis or device, documented in-house training/in-services that are specific to the patient care service that the caregiver is being privileged to provide, and/or documented specific work experience participating in patient care activities.



AMERICAN BOARD FOR CERTIFICATION IN
ORTHOTICS, PROSTHETICS AND PEDORTHICS, INC.

330 John Carlyle Street
Suite 210
Alexandria, VA 22314
703.836.7114

www.abcop.org