



February 1, 2021

Pennsylvania Department of State  
Michelle L. Elliott, Regulatory Analyst  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101  
Via email: [irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

RE: Regulation #16A-4947 (IRRC #3286)

Dear Ms. Elliott,

I am writing on behalf of the Board of Certification/Accreditation (BOC) to suggest some changes to the language of the proposed Regulation #16A-4947 (IRRC #3286). While we applaud the desire to streamline approval of precertification courses for Orthotic Fitters, some of the information in the proposal is not accurate. The Institute for Credentialing Excellence (ICE) and its accreditation arm, the National Commission for Certifying Agencies (NCCA,) do not accredit or otherwise recognize specific courses of education. We are concerned that the wording of the definition includes, **“...precertification education programs recognized by ICE and accredited by NCCA.”**

The fact that neither ICE nor NCCA recognize or accredit precertification courses makes it impossible for Orthotic Fitters seeking licenses in PA to comply with this requirement. BOC suggests the elimination of this language to avoid any unintended adverse effects on candidates seeking to serve the Commonwealth of Pennsylvania as Licensed Orthotic Fitters.

I am sure this is a simple oversight and would be happy to discuss this with you, colleagues at the IRRC, or the State Board of Medicine. I will call you soon to follow up, but also invite you to contact me at any time: [zack.chait@bocusa.org](mailto:zack.chait@bocusa.org), or directly at 410-753-8731.

Thank you for your time and consideration,

Zack Chait  
Regulatory and Legislative Analyst