

**Statements for Public Rules Hearing 1/29/13**

<b><u>Correspondent</u></b>	<b><u>Date Received</u></b>
Claudia Zacharias, MBA, CAE Board of Certification/Accreditation (BOC)	1/25/2013
Julie Bush, LO President Advanced Medical Supply, Inc.	1/25/2013
Richard L. Grope, LPO	1/25/2013
Mark Malinowski, LPED, BOCPD, COF	1/25/2013
Michael D. Veder, LO, LPED, CO, CPED Gaitwell O&P	1/28/2013
Joseph R. Garcia, LCPO, BOCOP, LTP	1/28/2013
Frank Horvath, LP Horvath Medical Supply, Inc.	1/28/2013
Michael T. Jablonski, CO, BOCO	1/28/2013
Janet Malinowski, LPED, CFO, COF	1/28/2013
Mark Malinowski, LPED, CFO, COF	1/28/2013
Pamela Haig, CPED, President Elect The Robert M. Palmer, M.D. Institute of Biomechanics, Inc.	1/29/2013



25 January 2013

Mark B. Levy, Board Director  
State Board of Orthotics, Prosthetics and Pedorthics  
77 S. High St., 18th Floor  
Columbus, OH 43215

**Comments for the public hearing on the rules scheduled for January 29, 2013**

Dear Mr. Levy.

Thank you for the opportunity to submit additional comments from the Board of Certification/Accreditation, International (BOC) for consideration as a testing agency for licensure in prosthetics, orthotics, and pedorthics. We are grateful to the Board to allow us to clear up some misconceptions that may have arisen during the rule-making process.

Earlier this week I called Pam Haig to obtain her insights about how we could more effectively partner with the Ohio State Board of Orthotics, Prosthetics and Pedorthics. She was kind enough to outline for me some of the comments she provided, and I noted that many of her perceptions were inaccurate. I would like to suggest that she may not have been the most expert of resources on whom to call. If I am not mistaken, she will be submitting some additional feedback.

I am concerned about the small number of respondents (three) who commented on the proposed rule-making. In the case of the lone podiatrist, he did not note – as we did – the fact that NCCA does not certify NCOPE requirements. The other comment that we were “not helpful” is also misleading. We take great care in providing excellent customer service. In fact, this week we were notified that BOC is a finalist for a national customer service award. Although the Ohio Board had shown good faith in attempting to be transparent in gathering data, these examples show the shortcomings in the process.

BOC was founded in 1984 as an independent, not-for-profit agency dedicated to meeting the demands for quality patient care by offering highly-valued credentials for practitioners and suppliers of comprehensive orthotics and prosthetics (O&P) and durable medical equipment (DME).

BOC currently offers certification programs in six professional areas: orthotist, prosthetist, pedorthist, orthotic fitter, mastectomy fitter, and durable medical equipment specialist. As a credentialing leader, BOC recognized a need and is responsible for creating the certified orthotic fitter, mastectomy fitter, and durable medical equipment specialist certifications.

In 2008, BOC joined with other major O&P organizations in signing what has become known as “The Historic Agreement.” This agreement set minimum educational levels for future orthotists and prosthetists. BOC has met and exceeded the requirements of this agreement and, as a result, BOC’s orthotist and prosthetist eligibility criteria include a CAAHEP-accredited education and an NCOPE-approved residency.

Currently, BOC is the only O&P credentialing organization with National Commission for Certifying Agencies (NCCA) accreditation for **all** of its O&P certification programs. On a personal note, I am proud to report that I recently was elected to the Board of Directors for the Institute of Credentialing Excellence, NCCA’s parent organization. I believe this demonstrates the credentialing community’s high regard for BOC.

The Centers for Medicare and Medicaid Services (CMS) recognize BOC as one of ten accrediting organizations for DMEPOS suppliers, and facilities can earn accreditation through BOC for all CMS billing categories. Many other third party payors recognize BOC Facility Accreditation as demonstrating a commitment to patient care and sound business practices.

BOC is committed to providing the O&P community with psychometrically sound assessments of the highest quality, relevance, and accuracy. This commitment requires that the development process be detailed, time-intensive, participatory, and consultative. In order to meet these high expectations, the process follows industry standards and psychometric principles to ensure valid and reliable testing instruments.

Assessments are the outcome of job task analyses authorized by BOC’s Board of Directors. A job task analysis (JTA) determines objectively and scientifically the actual skills, tasks, and knowledge necessary for a particular job. BOC’s job analyses are developed to ensure legal defensibility. Analyses are completed every five years for each certification.

A committee of subject matter experts (SMEs) – comprised of experienced, certified practitioners with both academic and clinical backgrounds – is formed to create an extensive list of all the tasks it believes might be performed at any time by the target audience. The tasks collected are compiled into a job analysis survey. After review, the survey is distributed to practicing professionals to rate each task on several criteria, including significance (i.e. frequency and importance); statistical analyses are then performed. The primary points of interest address the average significance of each task and the percent of respondents performing the task.

The final stage of development is to use the results of the JTA to develop the actual test specifications (detailed content outline) and items. The test specifications express specific competencies that practitioners must possess. Each content area is assigned a weight (i.e. number of test items indicating its importance relative to other areas). Then, SMEs receive training in item construction.

With the test specifications finalized, another group of SMEs authors items directly linked to the detailed content outline. After the items are written, edited, and checked for accuracy, the

assessment is formed; a score-setting review takes place. BOC uses the widely-accepted psychometric standard – the modified Angoff method – to create a cut (passing) score.

Candidates for the orthotist and prosthetist certifications also take a video practical exam. In this test, the candidate is videotaped performing a series of representative clinical activities. The video is then independently graded by three trained, experienced, expert scorers.

BOC and its testing vendor maintain communications throughout the year via conference call and in-person meetings to ensure testing instruments remain legally defensible and psychometrically sound.

BOC currently contracts with Applied Measurement Professionals (AMP) as its test development and delivery vendor. AMP has more than 100 clients and over 25 years of testing experience. Other AMP clients include the American Academy of Pain Management, National Board of Surgical Technology, and Orthopedic Nurses Certification Board.

Steven S. Nettles, EdD, Senior Vice President of Psychometrics, is the lead psychometrician assigned to BOC. He has performed professional assessment and applied research since 1972.

In partnership with AMP, BOC offers its multiple choice and clinical simulation tests year-round on most business days and some weekends at selected H&R Block sites nationwide. Candidates receive instant results at their testing facility upon completion of their tests.

In order to sit for any of BOC's certification exams, candidates must meet all eligibility requirements and pay the required fees. Maintaining BOC certification requires payment of annual renewal fees, meeting continuing education requirements, and upholding the BOC Code of Ethics.

There are several methods by which BOC would collaborate with the Ohio Board to provide proof of valid certification. The BOC Practitioner & Facility Directory is always available online at <http://go.bocusa.org> and all certificants who have given permission to have their information shared are listed there. Certificants in Ohio wishing to apply for licensure could also provide the Ohio Board with a copy of their most recent BOC certificate. If the Ohio Board would prefer an alternate arrangement—perhaps a periodic spreadsheet of all BOC certificants in Ohio—we would be happy to comply with its request.

As is our practice with all licensure states, BOC would keep the Ohio Board apprised if there were ethics violations involving Ohio licensees. Similarly, we invite and encourage communication from the Ohio Board should there be issues of concern involving BOC certificants.

As you can see, we see this additional information as important to the Ohio decision-making process. We are more than willing to provide the Board with any other information that would aid in an objective review of our qualifications. We appreciate your willingness “to make a different determination at a later date based on newer or different information.” We believe the items noted here qualify as that information.

Again, thank you for the opportunity to apprise the Ohio Board of our competence and expertise as a test delivery and credentialing organization. I believe we meet and exceed the requirements of the Board. Now that the amended rules enable the Board to select another testing vendor, I trust that the Board will choose BOC as a partner in contributing to the provision of quality patient care in Ohio.

If I may provide any additional information, please do not hesitate to contact me directly at [claudia@bocusa.org](mailto:claudia@bocusa.org) or 877.776.2200.

Sincerely,



Claudia Zacharias, MBA, CAE  
President and CEO

**ADVANCED MEDICAL SUPPLY, INC.  
4840 WEST BROAD STREET  
COLUMBUS, OHIO 43228  
614-870-0111**

Mark B. Levy, Board Director  
State Board of Orthotics, Prosthetics and Pedorthics  
77 S. High St., 18th Floor  
Columbus, OH 43215  
tel: 614-466-1157  
fax: 614-387-7347  
email: [mark.levy@opp.ohio.gov](mailto:mark.levy@opp.ohio.gov)

Mr. Levy,

***Please include this message as input for the public hearing on the rules scheduled for January, 29, 2013.***

I am writing in support of the rule amendment that was approved at the Board's December 12, 2012 meeting:

*An applicant for Ohio examination approved for admission to exam by the state board of orthotics, prosthetics, and pedorthics, shall comply with any and all deadlines established by the American board for certification in orthotics, prosthetics, and pedorthics (ABC), **or other test vendor approved for license exam administration by the state board of orthotics, prosthetics, and pedorthics**, and any contracted testing agencies. **An approval for admission to exam issued by the state board of orthotics, prosthetics, and pedorthics is valid for thirty-six months from date of initial issuance of the approval letter or the associated temporary license, whichever is the later date if different.***

The current policy of accepting only the ABC exam precludes many qualified BOC-certified practitioners from practicing in our state. This makes it difficult for business owners to recruit experienced practitioners from other states and ultimately results in limiting access to care for the citizens of Ohio.

BOC's exams are nationally accredited and are accepted by the VA, CMS, and the vast majority of other states. I ask that you accept BOC as another testing option and remedy this restriction as soon as you can. It hurts both Ohio businesses and Ohio patients.

Please contact me if I may provide additional information. Thank you for the opportunity to contribute to this important discussion.

Sincerely,

***Julie Bush, L.O. President***

Mark B. Levy, Board Director  
State Board of Orthotics, Prosthetics and Pedorthics  
77 S. High St., 18th Floor  
Columbus, OH 43215  
tel: 614-466-1157  
fax: 614-387-7347  
email: [mark.levy@opp.ohio.gov](mailto:mark.levy@opp.ohio.gov)

Mr. Levy,

***Please include this message as input for the public hearing on the rules scheduled for January, 29, 2013.***

I am writing in support of the rule amendment that was approved at the Board's December 12, 2012 meeting:

***An applicant for Ohio examination approved for admission to exam by the state board of orthotics, prosthetics, and pedorthics, shall comply with any and all deadlines established by the American board for certification in orthotics, prosthetics, and pedorthics (ABC), or other test vendor approved for license exam administration by the state board of orthotics, prosthetics, and pedorthics, and any contracted testing agencies. An approval for admission to exam issued by the state board of orthotics, prosthetics, and pedorthics is valid for thirty-six months from date of initial issuance of the approval letter or the associated temporary license, whichever is the later date if different.***

The current policy of accepting only the ABC exam precludes many qualified BOC-certified practitioners from practicing in our state. This makes it difficult for business owners to recruit experienced practitioners from other states and ultimately results in limiting access to care for the citizens of Ohio.

BOC's exams are nationally accredited and are accepted by the VA, CMS, and the vast majority of other states. I ask that you accept BOC as another testing option and remedy this restriction as soon as you can. It hurts both Ohio businesses and Ohio patients.

Please contact me if I may provide additional information. Thank you for the opportunity to contribute to this important discussion.

Sincerely,

***Richard L. Grope, LPO***

***330-792-6826***

Rec'd 01.25.2013 - State Board of OP&amp;P

Mark B. Levy, Board Director  
State Board of Orthotics, Prosthetics and Pedorthics  
77 S. High St., 18th Floor  
Columbus, OH 43215  
tel: 614-466-1157  
fax: 614-387-7347  
email: [mark.levy@opp.ohio.gov](mailto:mark.levy@opp.ohio.gov)

Mr. Levy,

**Please include this message as input for the public hearing on the rules scheduled for January, 29, 2013.**

I am writing in support of the rule amendment that was approved at the Board's December 12, 2012 meeting:

***An applicant for Ohio examination approved for admission to exam by the state board of orthotics, prosthetics, and pedorthics, shall comply with any and all deadlines established by the American board for certification in orthotics, prosthetics, and pedorthics (ABC), or other test vendor approved for license exam administration by the state board of orthotics, prosthetics, and pedorthics, and any contracted testing agencies. An approval for admission to exam issued by the state board of orthotics, prosthetics, and pedorthics is valid for thirty-six months from date of initial issuance of the approval letter or the associated temporary license, whichever is the later date if different.***

The current policy of accepting only the ABC exam precludes many qualified BOC-certified practitioners from practicing in our state. This makes it difficult for business owners to recruit experienced practitioners from other states and ultimately results in limiting access to care for the citizens of Ohio.

BOC's exams are nationally accredited and are accepted by the VA, CMS, and the vast majority of other states. I ask that you accept BOC as another testing option and remedy this restriction as soon as you can. It hurts both Ohio businesses and Ohio patients.

Please contact me if I may provide additional information. Thank you for the opportunity to contribute to this important discussion.

Sincerely,



Mark Malinowski, L.Ped, BOCPD, COF

Mark B. Levy, Board Director  
State Board of Orthotics, Prosthetics and Pedorthics  
77 S. High St., 18th Floor  
Columbus, OH 43215  
email: [mark.levy@opp.ohio.gov](mailto:mark.levy@opp.ohio.gov)

Mr. Levy,

As a successful, respected and seasoned (24 years) BOC employer and practitioner, I have found that BOC certified practitioners can impress and exceed their patients and referring physicians' expectations. The false impressions that some organizations and their members are implanting seem almost criminal due to their lack of objective evidence.

I am writing in support of the rule amendment that was approved at the Board's December 12, 2012 meeting:

*An applicant for Ohio examination approved for admission to exam by the state board of orthotics, prosthetics, and pedorthics, shall comply with any and all deadlines established by the American board for certification in orthotics, prosthetics, and pedorthics (ABC), **or other test vendor approved for license exam administration by the state board of orthotics, prosthetics, and pedorthics**, and any contracted testing agencies. **An approval for admission to exam issued by the state board of orthotics, prosthetics, and pedorthics is valid for thirty-six months from date of initial issuance of the approval letter or the associated temporary license, whichever is the later date if different.***

The current policy of accepting only the ABC exam precludes many qualified BOC-certified practitioners from practicing in our state. This makes it difficult for business owners to recruit experienced practitioners from other states and ultimately results in limiting access to care for the citizens of Ohio.

BOC's exams are nationally accredited and are accepted by the VA, CMS, and the vast majority of other states. I ask that you accept BOC as another testing option and remedy this restriction as soon as you can. It hurts both Ohio businesses and Ohio patients.

Please contact me if I may provide additional information. Thank you for the opportunity to contribute to this important discussion.

Sincerely,

*Michael*

Michael D. Veder, LO, LPed, CO, CPed  
Gaitwell O & P  
[gaitwellmv@yahoo.com](mailto:gaitwellmv@yahoo.com)  
937.336.2000



## Levy, Mark B

---

**From:** jgar5240@aol.com  
**Sent:** Sunday, January 27, 2013 9:24 PM  
**To:** Levy, Mark B  
**Subject:** Ohio examination

Mark B. Levy, Board Director  
State Board of Orthotics, Prosthetics and Pedorthics  
77 S. High St., 18th Floor  
Columbus, OH 43215  
tel: 614-466-1157  
fax: 614-387-7347  
email: [mark.levy@opp.ohio.gov](mailto:mark.levy@opp.ohio.gov)

Mr. Levy,

***Please include this message as input for the public hearing on the rules scheduled for January, 29, 2013.***

I am writing in support of the rule amendment that was approved at the Board's December 12, 2012 meeting:

***An applicant for Ohio examination approved for admission to exam by the state board of orthotics, prosthetics, and pedorthics, shall comply with any and all deadlines established by the American board for certification in orthotics, prosthetics, and pedorthics (ABC), or other test vendor approved for license exam administration by the state board of orthotics, prosthetics, and pedorthics, and any contracted testing agencies. An approval for admission to exam issued by the state board of orthotics, prosthetics, and pedorthics is valid for thirty-six months from date of initial issuance of the approval letter or the associated temporary license, whichever is the later date if different.***

The current policy of accepting only the ABC exam precludes many qualified BOC-certified practitioners from practicing in our state. This makes it difficult for business owners to recruit experienced practitioners from other states and ultimately results in limiting access to care for the citizens of Ohio.

BOC's exams are nationally accredited and are accepted by the VA, CMS, and the vast majority of other states. I ask that you accept BOC as another testing option and remedy this restriction as soon as you can. It hurts both Ohio businesses and Ohio patients.

Please contact me if I may provide additional information. Thank you for the opportunity to contribute to this important discussion.

Sincerely

Joseph R. Garcia LCPO,BOCOP,LTP  
330-670-8263



**Horvath Medical Supply, Inc.**

9930 Johnnycake Ridge Road, Unit 1C  
Mentor, Ohio 44060  
(440) 357-2371 • Fax (440) 357-2381

Mark B. Levy, Board Director  
State Board of Orthotics, Prosthetics and Pedorthics  
77 S. High St., 18<sup>th</sup> Floor  
Columbus, OH 43215  
Tel: 614-466-1157  
Fax: 614-387-7347  
Email: [mark.levy@opp.ohio.gov](mailto:mark.levy@opp.ohio.gov)

**Please include this message as input for the public hearing on the rules scheduled for January, 29, 2013.**

Mr. Levy,

I am writing in support of the rule amendment that was approved at the Board's December 12, 2012 meeting:

An applicant for Ohio examination approved for admission to exam by the State Board of Orthotics, Prosthetics, and Pedorthics, shall comply with any and all deadlines established by the American Board for Certification in Orthotics, Prosthetics and Pedorthics (ABC), or other test vendor approved for license exam administered by the State Board of Orthotics, Prosthetics, and Pedorthics, and any contracted testing agencies. An approval for admission to exam issued by the State Board of Orthotics, Prosthetics, and Pedorthics is valid for thirty-six months from date of initial issuance of the approval letter or the associated temporary license, whichever is the later date if different.

The current policy of accepting only the ABC exam precludes many qualified BOC- certified practitioners from practicing in our state. This makes it difficult for business owners to recruit experienced practitioners from other states and ultimately results in limiting access to care for the citizens of Ohio.

BOC's exams are nationally accredited and are accepted by the VA, CMS, and the vast majority of other states. I ask that you accept BOC as another testing option and remedy this restriction as soon as you can. It hurts both Ohio businesses and Ohio patients.

Please contact me if additional information is needed. Thank you for the opportunity to contribute to this important discussion.

Sincerely,

A handwritten signature in black ink that reads "Frank Horvath".

Frank Horvath, LP 0051  
Horvath Medical Supply, Inc.  
9930 Johnnycake Ridge Rd Unit 1c  
Mentor, Ohio 44060  
(440) 357-2371 Office  
(440) 796-4330 Cell

Mark B. Levy, Board Director  
State Board of Orthotics, Prosthetics and Pedorthics  
77 S. High St., 18th Floor  
Columbus, OH 43215  
tel: 614-466-1157  
fax: 614-387-7347  
email: [mark.levy@opp.ohio.gov](mailto:mark.levy@opp.ohio.gov)

Mr. Levy,

***Please include this message as input for the public hearing on the rules scheduled for January, 29, 2013.***

I am writing in support of the rule amendment that was approved at the Board's December 12, 2012 meeting:

***An applicant for Ohio examination approved for admission to exam by the state board of orthotics, prosthetics, and pedorthics, shall comply with any and all deadlines established by the American board for certification in orthotics, prosthetics, and pedorthics (ABC), or other test vendor approved for license exam administration by the state board of orthotics, prosthetics, and pedorthics, and any contracted testing agencies. An approval for admission to exam issued by the state board of orthotics, prosthetics, and pedorthics is valid for thirty-six months from date of initial issuance of the approval letter or the associated temporary license, whichever is the later date if different.***

The current policy of accepting only the ABC exam precludes many qualified BOC-certified practitioners from practicing in our state. This makes it difficult for business owners to recruit experienced practitioners from other states and ultimately results in limiting access to care for the citizens of Ohio.

BOC's exams are nationally accredited and are accepted by the VA, CMS, and the vast majority of other states. I ask that you accept BOC as another testing option and remedy this restriction as soon as you can. It hurts both Ohio businesses and Ohio patients.

Please contact me if I may provide additional information. Thank you for the opportunity to contribute to this important discussion.

Sincerely,  
**Michael T. Jablonski, CO, BOCO, Licensed Sate of Ohio**  
**Cell # 440-479-8494**  
**Email: [mjablonski@nationalrehab.com](mailto:mjablonski@nationalrehab.com)**

Mark B. Levy, Board Director  
State Board of Orthotics, Prosthetics and Pedorthics  
77 S. High St., 18th Floor  
Columbus, OH 43215  
tel: 614-466-1157  
fax: 614-387-7347  
email: [mark.levy@opp.ohio.gov](mailto:mark.levy@opp.ohio.gov)

Mr. Levy,

***I have been working in Ohio for many years and truly believe that Ohio should accept BOC as well as ABC. I am dually certified with both organizations. I found the testing and requirements to be equally challenging.***

***Please include this message as input for the public hearing on the rules scheduled for January, 29, 2013.***

I am writing in support of the rule amendment that was approved at the Board's December 12, 2012 meeting:

***An applicant for Ohio examination approved for admission to exam by the state board of orthotics, prosthetics, and pedorthics, shall comply with any and all deadlines established by the American board for certification in orthotics, prosthetics, and pedorthics (ABC), or other test vendor approved for license exam administration by the state board of orthotics, prosthetics, and pedorthics, and any contracted testing agencies. An approval for admission to exam issued by the state board of orthotics, prosthetics, and pedorthics is valid for thirty-six months from date of initial issuance of the approval letter or the associated temporary license, whichever is the later date if different.***

The current policy of accepting only the ABC exam precludes many qualified BOC-certified practitioners from practicing in our state. This makes it difficult for business owners to recruit experienced practitioners from other states and ultimately results in limiting access to care for the citizens of Ohio.

BOC's exams are nationally accredited and are accepted by the VA, CMS, and the vast majority of other states. I ask that you accept BOC as another testing option and remedy this restriction as soon as you can. It hurts both Ohio businesses and Ohio patients.

Please contact me if I may provide additional information. Thank you for the opportunity to contribute to this important discussion.

Sincerely,

Janet Malinowski  
LPed, CFO and COF

Mark B. Levy, Board Director  
State Board of Orthotics, Prosthetics and Pedorthics  
77 S. High St., 18th Floor  
Columbus, OH 43215  
tel: 614-466-1157  
fax: 614-387-7347  
email: [mark.levy@opp.ohio.gov](mailto:mark.levy@opp.ohio.gov)

Mr. Levy,

***I have been working in Ohio for many years and truly believe that Ohio should accept BOC as well as ABC. I am dually certified with both organizations. I found the testing and requirements to be equally challenging.***

***Please include this message as input for the public hearing on the rules scheduled for January, 29, 2013.***

I am writing in support of the rule amendment that was approved at the Board's December 12, 2012 meeting:

***An applicant for Ohio examination approved for admission to exam by the state board of orthotics, prosthetics, and pedorthics, shall comply with any and all deadlines established by the American board for certification in orthotics, prosthetics, and pedorthics (ABC), or other test vendor approved for license exam administration by the state board of orthotics, prosthetics, and pedorthics, and any contracted testing agencies. An approval for admission to exam issued by the state board of orthotics, prosthetics, and pedorthics is valid for thirty-six months from date of initial issuance of the approval letter or the associated temporary license, whichever is the later date if different.***

The current policy of accepting only the ABC exam precludes many qualified BOC-certified practitioners from practicing in our state. This makes it difficult for business owners to recruit experienced practitioners from other states and ultimately results in limiting access to care for the citizens of Ohio.

BOC's exams are nationally accredited and are accepted by the VA, CMS, and the vast majority of other states. I ask that you accept BOC as another testing option and remedy this restriction as soon as you can. It hurts both Ohio businesses and Ohio patients.

Please contact me if I may provide additional information. Thank you for the opportunity to contribute to this important discussion.

Sincerely,

Mark Malinowski  
LPed, CFO and COF



## The Robert M. Palmer, M.D., Institute Of Biomechanics, Inc.

A 501 (3)(c) Not-For-Profit School

Contact Us At: [www.rmpi.org](http://www.rmpi.org)  
1601 Main Street, Elwood, IN 46036  
Phone: 765-557-7216 | Fax: 765-557-7223

January 28, 2013

Mark B. Levy, Board Director  
State Board of Orthotics, Prosthetics and Pedorthics  
77 S. High Street, 18<sup>th</sup> Floor  
Columbus, OH 43215

Thank you again for inviting me to speak at the Ohio State Board of Orthotics, Prosthetics and Pedorthics last month. Since the decision to add BOC as a testing agency for Ohio OP&P licensure is an important one that will affect many people, I believe I should reiterate topics while reflecting more accurately on others which may impact your decision.

- 1) As mentioned, I can not validate that the BOC exam meets or exceeds the ABC pedorthic exam. I too cannot attest that ABC's inherited exam meets the competency level of a modern day pedorthist. At this time I have been informed that only the BOC provides instant testing; while not confirmed with the impending deadline for tomorrow's meeting. I recommend this be a requirement of all certification exams of any allied health profession.
- 2) While the minutes for our meeting last month do not reflect our discussion of the infraction to the curriculum I participated in during a BOC Orthotic Fitters Course they are not the only accrediting organization who has these same infractions by their educators. I do however feel that an educator represents the sponsor or accrediting organization and should comply with ethical standards complimentary of the accrediting organization. I strongly recommend that students be required to complete a survey and directly submit it to the sponsoring or accrediting organizations before departing any course and sealed in an envelope for direct delivery to the accrediting organization.
- 3) I have learned more about the work experience verification process for the orthotic fitter certification as well as the orthotist certification process and I have been assured that the BOC has protocols established to ensure that a person who has not officially participated in work experience can not participate in the BOC exam. I would need to inspect the work experience verification process to retract my statement, as our staff reflects unanimously on the statement made by the BOC approved educator whether accurate or inaccurate. This statement was during the years of 2010 and may not reflect the current standards established by the BOC.

Please contact me if I can answer any additional questions or assist in any way towards improving the academic standards or protocols of pedorthic education.

Respectfully,

Pamela Haig, C.Ped.  
President Elect