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December 1, 2022

Hon. Terry Johnson, Chair
Senate Workforce and Education Committee
Statehouse
1 Capitol Square, 2nd Floor
Columbus, OH 43215
Attn: tara.marasco@ohiosenate.gov

Re: Ohio Orthotics and Prosthetics Proposed Licensure Bill

Dear Sen. Johnson:

The American Board for Certification in Orthotics, Prosthetics and Pedorthics (ABC) is concerned about the current proposed legislation (Sub. House Bill 509). It will impact the licensing of orthotists, prosthetists and pedorthists in Ohio, and has the potential to reduce patients' access to care. We appreciate the opportunity to comment on some aspects of the bill.

ABC fully supports ensuring that patients receive services from appropriately trained and educated orthotic and prosthetic professionals. We support the established requirements for all individuals providing O&P care in Ohio. Assuring minimal competency of these healthcare providers ultimately protects patients. We believe the Ohio O&P licensure requirements accomplish this goal.

The proposed elimination of single discipline licensure categories for orthotists and prosthetists is puzzling. Orthotists and prosthetists have separate and distinct scopes of practice. An orthotist provides an orthotic intervention to address a musculoskeletal condition. A prosthetist provides a limb prosthesis for a person with a limb loss. These are separate disciplines and cannot simply be combined. We urge the Ohio legislature to amend the bill to maintain the ability of O&P professionals to obtain an orthotist or prosthetist license.

ABC does not support any reduction in the OTPTAT board's ability to discipline a license holder if they are found to be out of compliance with Ohio's requirements. The OTPTAT board should be able to protect patients from license holders who do not maintain the ethical standards in Ohio.

Nor does ABC support narrowing the supervision requirements for a non-licensed person practicing pedorthics. Pedorthics is a sub-set of orthotics. An orthotist has all pedorthic scope of services within their own scope of practice. An orthotist should be allowed to supervise pedorthic patient care.

Finally, ABC does not support the elimination of the Ohio Orthotics, Prosthetics and Pedorthics Advisory Counsel. We believe that there are almost 400 O, P & P license holders in Ohio. Eliminating

the Advisory Counsel would leave these professionals with no representation with their governing body.

Please feel free to contact me if we can provide any clarification of these comments or if any additional information is needed.

Sincerely,

A handwritten signature in black ink that reads "Steve Fletcher CPO." The signature is written in a cursive style.

Stephen Fletcher, CPO
Director of Professional Credentialing
sfletcher@abcop.org

cc: Missy Anthony, OTPTAT Board – missy.anthony@otptat.ohio.gov