**Here is a pre-written comment that you can easily customize and submit.**

**The text that appears in red should be deleted and replaced with your own words.**

**Feel free to personalize or modify any other sections, as well.**

**Then, mail your comment to Ms. Tavenner, or submit your comment online at**

[**http://www.regulations.gov/#!submitComment;D=CMS-2014-0092-0002**](http://www.regulations.gov/#!submitComment;D=CMS-2014-0092-0002)**.**

Marilyn Tavenner, Administrator

Centers for Medicare and Medicaid Services

U.S. Department of Health and Human Services

Attention: CMS-1614-P

P.O. Box 8010

Baltimore, MD 21244-8010

Dear Administrator Tavenner:

Thank you for the opportunity to comment on CMS-1614-P: Medicare Program; End-Stage Renal Disease Prospective Payment System, Quality Incentive Program, and Durable Medical Equipment, Prosthetics, Orthotics, and Supplies. Add a sentence or two about your own background, credentials, and anything else that shows you are qualified to comment.

Certified Orthotic Fitters receive instruction in areas including Anatomy/Physiology, Pathologies, Biomechanics, Patient Assessment, Materials/Equipment/Tools, Follow-up Plans, and Practice Management. Then, after completion of their course instruction and 1,000 hours of direct patient care, an Orthotic Fitter candidate must pass a nationally accredited exam that is developed based on a job task analysis (aka practice analysis). Legal precedents, government guidelines, and industry standards recognize that job analyses ensure that examination content directly corresponds to the professionals’ role. Therefore, thousands of Certified Orthotic Fitters delivering care today possess the requisite professional skills to practice in their field.

Both national boards that certify Orthotic Fitters -- the Board of Certification/Accreditation (BOC) and the American Board for Certification (ABC) -- offer Orthotic Fitter certification programs accredited by the National Commission for Certifying Agencies (NCCA). NCCA standards require demonstration of a valid and reliable process for development, implementation, maintenance, and governance of certification programs. NCCA uses a rigorous peer review process to establish accreditation standards; evaluate compliance with the standards; and recognize organizations/programs that demonstrate compliance.

Why would CMS preclude service from qualified Orthotic Fitter certificants who are successfully delivering care? All the evidence shows that Certified Orthotics Fitters have the requisite training and experience to safely and effectively provide prefabricated custom-fitted orthotics.

If the draft regulations are implemented as is, the public will lose a significant number of Certified Orthotic Fitters. If they cannot bill Medicare, they will leave the profession. In some areas, like rural markets, Certified Orthotic Fitters provide a significant share of orthotic services. The Medicare beneficiaries who receive these services will likely become underserved in the future if this should happen.

**CMS has already validated the existing deemed accreditation organizations’ implementation and enforcement of the DMEPOS Quality Standards. CMS should allow the deemed accreditation organizations — including both ABC and BOC — the ability to continue to maintain their long-established certification and licensing requirements related to approval of suppliers who wish to bill for Orthotics: custom-fitted prefabricated (OR02).**

Thank you again for this opportunity to comment and thank you in advance for doing the right thing for Certified Orthotic Fitters and the patients they serve.

Very respectfully.

Insert your name, credentials, and contact information