



U.S. Department  
of Veterans Affairs

# **NATIONAL STANDARD OF PRACTICE: ORTHOTIST, PROSTHETIST, AND PROSTHETIST-ORTHOTIST**

**March 2024**

**PURPOSE:** This report provides a summary of internal and external feedback received for the draft Orthotist, Prosthetist, and Prosthetist-Orthotist VA national standard of practice during the comment period from March to May 2023.

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## Executive Summary

The Department of Veterans Affairs (VA) is establishing national standards of practice for health care professionals who have a license, certification, registration, or other state requirement. The VA national standards of practice are a standardized set of services that all health care professionals in a given occupation can perform while employed by VA if their VA medical facility performs such services and they have the proper education, training, and skill to perform the services. As part of a comprehensive development process to establish each occupation's national standard of practice, VA affords the public, Veterans, professional associations, VA employees, unions, and other interested parties the opportunity to provide feedback on the national standard of practice prior to finalization and publication in VA policy.

Orthotists, Prosthetists, and Prosthetist-Orthotists are health care professionals who are specifically educated and trained to manage comprehensive orthotic and prosthetic patient care. On March 14, 2023, VA sent letters to the American Board for Certification (ABC) and the Board of Certification/Accreditation (BOC) to inform them of VA's intent to follow the ABC standards for the national standard of practice for Orthotists, Prosthetists, and Prosthetist-Orthotists and provided them with an opportunity to discuss the proposed national standard of practice with VA. VA also sent letters to the 15 state licensing boards for Orthotists, Prosthetists, and Prosthetist-Orthotists and provided them an opportunity to discuss the proposed national standard of practice with VA. In addition, from March 14 to May 15, 2023, VA posted the proposed national standard of practice for VA Orthotists, Prosthetists, and Prosthetist-Orthotists in the Federal Register ([88 FR 15858](#)) for public comment and within VA's intranet for VA employee comment.

The proposed national standard of practice for Orthotists, Prosthetists, and Prosthetist-Orthotists received 95 total comments across all platforms — seven comments from the state licensing boards for Orthotists, Prosthetists, and Prosthetist-Orthotists, two comments from the national certification bodies, 85 comments from VA employees, and one comment from a professional association. VA reviewed all comments received and made three changes to the national standard of practice in response to comments.

This report provides a summary of comments received on VA's proposed Orthotist, Prosthetist, and Prosthetist-Orthotist national standard of practice. It also provides VA's response to the comments and changes made to the national standard of practice in response to feedback received.

## Authority

Chapters 73 and 74 of title 38 of the United States Code (U.S.C.) and 38 U.S.C. 303 permit the Secretary to further regulate the Department of Veterans Affairs health care professions to make certain that VA's health care system provides safe and effective health care by qualified health care professionals to ensure the well-being of those Veterans who have borne the battle.

On November 12, 2020, VA published an interim final rule confirming that VA health care professionals may practice their health care profession consistent with the scope and requirements of their VA employment, notwithstanding any state license, registration, certification, or state other requirements that unduly interfere with their practice. 38 CFR 17.419; 85 FR 71838.

Specifically, this rulemaking confirmed VA's practice of allowing VA health care professionals to deliver health care services in a state other than the health care professional's state of licensure, registration, certification, or other state requirement, thereby enhancing Veterans' access to critical VA health care services. The rulemaking also confirmed VA's authority to establish national standards of practice for its health care professionals which would standardize a health care professional's practice in all VA medical facilities, regardless of conflicting state laws, rules, regulations, or other state requirements.

The rulemaking explained that a national standard of practice describes the tasks and duties that a VA health care professional practicing in the health care profession may perform and may be permitted to undertake. Having a national standard of practice means that individuals from the same VA health care profession may provide the same type of tasks and duties regardless of the state where they are located or the state license, registration, certification, or other state requirement they hold. VA emphasized in the rulemaking and reiterates here that VA will determine, on an individual basis, that a health care professional has the proper education, training, and skills to perform the tasks and duties detailed in the national standard of practice and that they will only be able to perform such tasks and duties after they have been incorporated into the individual's privileges, scope of practice, or functional statement. The rulemaking explicitly did not create any such national standards and directed that all national standards of practice would be subsequently created via policy.

As authorized by 38 CFR 17.419, VA is developing national standards of practice via policy. There will be one overarching national standard of practice directive that will generally describe Veterans Health Administration (VHA) policy; each individual national standard of practice will be an appendix to the directive. The directive and all appendices will be accessible on the VHA Publications website at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external) once published.

## Purpose

As the Nation's largest integrated health care system, it is critical that VA develops national standards of practice to ensure first, that beneficiaries receive the same high-quality care regardless of where they enter the system and, second, that VA health care professionals can efficiently meet the needs of beneficiaries when practicing within the scope of their VA employment. National standards are designed to increase beneficiaries' access to safe and effective health care, thereby improving health outcomes.

The importance of this initiative has been underscored by the coronavirus disease 2019 (COVID-19) pandemic. The increased need for mobility in VA's workforce, including through VA's Disaster Emergency Medical Personnel System, highlighted the importance of creating uniform national standards of practice to better support VA health care professionals who practice across state lines. As a national health care organization, VA often has health care professionals primarily based out of a VA medical center in one state travel to smaller community-based outpatient clinics in neighboring States to ensure access to care for Veterans.

Creating national standards of practice also promotes interoperability of medical data between VA and Department of Defense (DoD), providing a complete picture of a Veteran's health information and improving VA's delivery of health care to our Nation's Veterans. DoD has historically standardized practice for certain health care professionals, and VA has closely partnered with DoD to learn from their experience.

As a national health care system, it is also imperative that VA can recruit and retain health care professionals, to ensure there is access to health care regardless of where the Veteran resides. VA needs the flexibility to hire qualified health care professionals from any state to meet the staffing needs of a VA medical facility where recruitment or retention is difficult. This flexibility is especially beneficial in recruiting spouses of active service members who frequently move across the country and can be subject to delays in starting new employment due to needing to obtain an additional state requirement to practice in the new state.

### Development Process

To develop VA's national standards of practice, VA is using a robust, interactive process that adheres to the guidelines outlined in [Executive Order \(EO\) 13132](#) to preempt conflicting state laws, rules, regulations, or other requirements. All standards undergo a deliberate review process, both within VA and externally, to ensure that the draft national standard is consistent with VA's team-based approach to care, results in the highest quality of care for Veterans, is implementable on an enterprise level, and is legally supportable. The process includes consultation with internal and external stakeholders, including state licensing boards, VA employees, professional associations, Veterans Service Organizations, labor partners, and others.

For each VA occupation, a workgroup comprised of health care professionals in the identified occupation conducts research to identify internal best practices that may not be authorized under every state license, certification, or registration, but would enhance the practice and efficiency of the profession throughout VA. If a best practice is identified that is not currently authorized by every state, the workgroup determines what education, training, and skills are required to perform such task or duty. The workgroup then drafts a proposed VA national standard of practice using the data gathered during the research and incorporates internal stakeholder feedback into the standard. The workgroup may consult with internal or external stakeholders at any point throughout the process.

The proposed national standard of practice is internally reviewed, to include by an interdisciplinary workgroup consisting of representatives from Quality Management; VA Medical Center Chief of Staff; Academic Affiliates; Veterans Integrated Services Network (VISN) Chief Nursing Officer; Ethics; Workforce Management and Consulting; Surgery; Credentialing and Privileging; VISN Chief Medical Officer; and Electronic Health Record Modernization.

Externally, the proposed national standard of practice is provided to our partners in DoD as a notification and opportunity to flag inconsistencies with DoD standards. In addition, VA labor partners are engaged informally as part of a pre-decisional collaboration. Consistent with EO 13132, a letter is sent to each state board and certifying organization or registration organization, as appropriate, which includes the proposed national standard and offers the recipient an

opportunity to discuss the national standard with VA. After the state boards, certifying organizations, or registration organizations have received notification, the proposed national standard of practice is posted in the Federal Register for 60 days to obtain feedback from the public, professional associations, and any other interested parties. At the same time, the proposed national standard is posted to an internal VA site to obtain feedback from VA employees. Responses received through all vehicles—from state boards, professional associations, unions, VA employees, and any other individual or organization who provides comments via the Federal Register—will be reviewed. VA will make appropriate revisions in light of the comments, including those that present evidence-based practice and alternatives that help VA meet our mission and goals. VA may also make additional changes outside the scope of the comments during its own internal review processes after the conclusion of the comment period. This document provides a summary of the comments received and VA's response to the comments.

## VA Orthotist, Prosthetist, and Prosthetist-Orthotist Feedback on National Standard

VA Orthotists, Prosthetists, and Prosthetist-Orthotists are health care professionals who are specifically educated and trained to manage comprehensive orthotic or prosthetic patient care. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up, and practice management. Documentation by the Orthotist, Prosthetist, and Prosthetist-Orthotist is part of the patient's medical record and assists with establishing medical necessity for orthotic or prosthetic care. VA employs approximately 350 Orthotists, Prosthetists, and Prosthetist-Orthotists in the United States.

VA's proposed national standard of practice for Orthotists, Prosthetists, and Prosthetist-Orthotists did not propose to preempt any current state requirements and instead proposed to confirm that all Orthotists, Prosthetists, and Prosthetist-Orthotists follow the American Board for Certification (ABC) standards. There are two certifying bodies for Orthotists, Prosthetists, and Prosthetist-Orthotists—ABC and the Board of Certification/Accreditation (BOC). There is no difference between ABC and BOC standards regarding the tasks and duties these health care professionals are permitted to perform. However, BOC discontinued their acceptance of new applicants for certification in orthotics and/or prosthetics in 2016, although BOC still maintains support and annual recertification for individuals with existing certifications. Through attrition, the Orthotist, Prosthetist, and Prosthetist-Orthotist clinical providers practicing with BOC credentials will be phased out.

Although VA continues to recognize and accept BOC credentials per the VA qualification standards detailed in VA Handbook 5005, Staffing, Part II, Appendix G32, VA's national standard of practice confirms that all VA Orthotists, Prosthetists, and Prosthetist-Orthotists follow ABC standards, because that standard will eventually be the only active standard of the two. As there is no difference between what duties and tasks are allowed under the two certifications, there is no change in practice for any Orthotists, Prosthetists, and Prosthetist-Orthotists under this national standard of practice.

On March 14, 2023, VA posted the proposed national standard of practice for Orthotists, Prosthetists, and Prosthetist-Orthotists in the Federal Register ([88 FR 15858](#)) and within VA's intranet for public and employee feedback, respectively. The proposed national standard of practice remained open for comment for 60 days, through May 15, 2023. A copy of the national standard of practice for Orthotists, Prosthetists, and Prosthetist-Orthotists that was posted for feedback is located in [Appendix A](#).

The Under Secretary for Health also sent letters to 15 state licensing boards for Orthotists, Prosthetists, and Prosthetist-Orthotists, ABC, and BOC to inform them of VA's intent to follow ABC standards and provide them with an opportunity to provide feedback directly to VA. Copies of those letters are located in [Appendix B](#). All 15 State licenses offer an exemption for employees working at Federal facilities.

VA specifically sought feedback through the following questions:

1. *Are there any required trainings for the aforementioned practices that we should consider?*
2. *Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any state?*
3. *Is there any variance in practice that we have not listed?*
4. *What should we consider when preempting conflicting state laws, regulations, or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel?*
5. *Is there anything else you would like to share with us about these national standards of practice?*

In addition to leaving specific comments and suggestions, commenters internal to VA could choose to provide agreement or disagreement on the proposed national standard. Agreement denotes overall acceptance of the standard while disagreement denotes that the national standard in its original form presents significant clinical, legal, or patient safety concerns. Employees could also select not applicable if the national standard did not pertain to their area of expertise.

In response to the proposed national standard of practice for Orthotists, Prosthetists, and Prosthetist-Orthotists, VA received one comment from a professional association through the Federal Register. Through an internal VA site, VA received 85 comments from VA employees. VA received seven responses from state licensing boards, and feedback from the two certification bodies for Orthotists, Prosthetists, and Prosthetist-Orthotists. Out of the 85 employee comments, 67 employees *agreed*, one employee *disagreed*, and 17 employees selected *not applicable*.<sup>1</sup>

### Certification Body Feedback

On March 14, 2023, VA sent letters to the American Board for Certification (ABC) and the Board of Certification/Accreditation (BOC) to inform them of VA's intent to follow the ABC standards for the national standard of practice for Orthotists, Prosthetists, and Prosthetist-Orthotists and provided them with an opportunity to discuss the proposed national standard of practice with VA.

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<sup>1</sup> At the time of feedback, employees were prompted to select "concur," "concur with comments," and "non-concur."

Comment from ABC: ABC suggested that VA update the qualification standards for Orthotists, Prosthetists, and Prosthetist-Orthotists, located in VA Handbook 5005, Staffing, Part II, Appendix G32. In addition, ABC suggested that VA amend its national standard of practice by changing the term “patient assessment” to “patient evaluation” and the term “follow-up” to “continuation of the treatment plan.”

Response: VA qualification standards are not within the scope of the national standards of practice initiative and will not change as a result of the national standard of practice.

VA agrees with the suggested changes to the terminology used in the national standard of practice and amended the national standard of practice to use the terms “patient evaluation” instead of “patient assessment” and “continuation of the treatment plan” instead of “follow-up.”

Comment from BOC: BOC raised concerns with VA’s proposal to adopt a standard of practice consistent with ABC standards. BOC stated that doing so would be problematic because ABC requires a master’s degree, and that requiring a master’s degree would limit available practitioners and may limit Veterans’ access to care.

Response: VA confirms that all orthotists, prosthetists, and prosthetist-orthotists will practice consistent with ABC standards and does not affect the qualification standards for Orthotists, Prosthetists, and Prosthetist-Orthotists. VA will continue to recognize and accept BOC credentials per the VA qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G32, dated March 21, 2017. VA amended the national standard of practice to include a note that the qualification standards will not change and VA Orthotists, Prosthetists, and Prosthetist-Orthotists can hold either a certification from ABC or BOC.

### State Licensing Board Feedback

On March 14, 2023, VA sent letters to the 15 state licensing boards for Orthotists, Prosthetists, and Prosthetist-Orthotists with the proposed national standard of practice and provided them with an opportunity to discuss the proposed national standard of practice with VA. VA received comments from 7 of the 15 state licensing boards, and all endorsed the proposed Orthotist, Prosthetist, and Prosthetist-Orthotist VA national standard of practice. VA thanks the state licensing boards for their feedback and partnership.

Comment: The Arkansas Board of Orthotics, Prosthetics, and Pedorthics supported VA’s proposed standard for Orthotists, Prosthetists, and Prosthetist-Orthotists and noted that Arkansas requires a practitioner to successfully complete a clinical National Commission on Orthotic and Prosthetic Education (NCOPE) residency in orthotics and prosthetics.

Response: The qualification standards for VA Orthotists, Prosthetists, and Prosthetist-Orthotists are beyond the scope of this initiative and will not change as a result of this national standard of practice.



## Professional Association Feedback

Comment: The American Orthotic and Prosthetic Association submitted a letter via the Federal Register recommending that VA consider adopting the existing standards from both ABC and BOC for more comprehensive guidance in developing national standards.

Response: VA includes only the ABC standards in the proposed Orthotist, Prosthetist, and Prosthetist-Orthotist national standard of practice because it is the certifying body that provides the most detailed standards and scope of practice. However, because the BOC standard similarly permits and restricts the same duties and tasks as the ABC standard, there will be no change in practice for those professionals who have a BOC certification. Moreover, VA will continue to allow the BOC credentials in the hiring process per VA qualification standards.

## Feedback Across Five Areas

All commenters had the opportunity to provide responses to the five areas on which VA solicited feedback, and VA responds to any questions or concerns raised by the commenters in response to those areas below.

VA received comments from employees that were supportive of the draft national standard of practice, as well as comments that were not responsive to the specific national standard of practice.

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*“This is a good National model that is recognized across the country.” – Comment from VA employee*

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### 1. Are there any required trainings for the aforementioned practices that we should consider?

Comment: One employee commented that two organizations offer additional, optional trainings—the American Academy of Orthotists and Prosthetists and the American Orthotic and Prosthetic Association—but did not list any additional required trainings. Another employee identified that VA Orthotists, Prosthetists, and Prosthetist-Orthotists must maintain their individual certification through mandatory continuing education. The employee suggested VA should provide those educational opportunities as provided to other medical fields in the VA.

Response: The two trainings noted by the commenter were optional and therefore VA does not believe they should be required for all professionals.

Comment: Another employee identified that VA Orthotists, Prosthetists, and Prosthetist-Orthotists must maintain their individual certification through mandatory continuing education. The employee suggested VA should provide those educational opportunities as provided to other medical fields in the VA.

Response: VA Orthotic, Prosthetic, and Pedorthic Clinical Services offers monthly webinars, which provide free continuing education opportunities to VA Orthotists, Prosthetists, and Prosthetist-Orthotists.

### 2. Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any state?

Comment: Several employees expressed concerns over Orthotists, Prosthetists, and Prosthetist-Orthotists who were hired into the position prior to the publication of the current VA qualification standards (known as being “grandfathered”) that do not meet the basic requirements for education and certification being promoted beyond the journey level or placed in supervisory or managerial positions.

Response: The qualification standards are not changing as a result of the national standard of practice and the national standards of practice do not affect who can be hired nor promoted. The national standard of practice only applies to clinical work performed by certified VA Orthotists, Prosthetists, and Prosthetist-Orthotists. However, based on the concerns raised, VA has amended the national standard of practice to clarify that it does not apply to Orthotists, Prosthetists, and Prosthetist-Orthotists who are grandfathered into their positions.

Comment: One employee commented that VA should revise the qualification standards to remove the Commission on Accreditation of Allied Health Education Programs accreditation requirement because it limits the number of applicants.

Response: The qualification standards are not changing as a result of the VA national standard of practice.

### *3. Is there any variance in practice that we have not listed?*

Comment: One employee asked whether a Certified Orthotist with a master’s degree in Prosthetics and Orthotics can see and treat prosthetic patients without having passed the Prosthetics ABC exams.

Response: A credentialed VA Prosthetist may, at their discretion and under their indirect supervision, grant a credentialed VA Orthotists a Scope of Practice Extension (SOPE) to provide prosthetics-related services. However, the individual must have the requisite education, training, and skill as the national standard of practice does not permit employees to practice tasks or duties for which they are not qualified or trained.

### *4. What should we consider when preempting conflicting state laws, regulations, or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel?*

Comment: One employee asked how the proposed national standard of practice for Orthotists, Prosthetists, and Prosthetist-Orthotists would impact trainees and residents.

Response: The national standard of practice only applies to certified Orthotists, Prosthetists, and Prosthetist-Orthotists; therefore, trainees and residents do not adhere to the national standard of practice.

Comment: Another employee noted that for any trainees, supervision must be provided by individuals with the appropriate certification in this occupation.

Response: VA Orthotists, Prosthetists, and Prosthetist-Orthotists in supervisory roles must meet the requirements in the qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G32, dated March 21, 2017.

Comment: One employee recommended there should be a requirement established for clinical supervision.

Response: The national standard of practice only applies to clinical work performed by certified VA Orthotists, Prosthetists, and Prosthetist-Orthotists; it does not address organizational structure.

*5. Is there anything else you would like to share with us about these national standards of practice?*

Comment: An employee commented it would be helpful to discuss the proposed national standard of practice on a national call.

Response: Once the national standard of practice is finalized and published, the VA Orthotic, Prosthetic, and Pedorthic Clinical Services program office will begin implementation of the national standard, which will include communication to all employees.

Comment: An employee suggested allowing certified and licensed VA Orthotists, Prosthetists, and Prosthetist-Orthotists to provide consults to allied modalities, such as Physical Therapy, Occupational Therapy, and Podiatry for treatments their services are reliant on. The commenter stated that it would allow for more efficient treatment of patients and reduce stagnant consults.

Response: VA has already adopted an interdisciplinary model of care such as the one described above. The national standard of practice will not change that model.

Comment: An employee commented that it would be helpful to include explicit language stating employees who hold state licensure are permitted to let their state licensure lapse.

Response: As stated in the national standard of practice, and according to VA qualification standards, VA only requires a certification for Orthotists, Prosthetists, and Prosthetist-Orthotists. There are 15 states that require licensure: Alabama, Arkansas, Florida, Georgia, Illinois, Iowa, Kentucky, Minnesota, New Jersey, Ohio, Oklahoma, Pennsylvania, Tennessee, Texas, Washington. All 15 States exempt Federal employees from their state license requirements; therefore, it is up to the individual VA employee on whether they choose to obtain or maintain state licensure in addition to the certification.

Comment: One employee asked if there would be a national standard of practice for Certified Orthotist/Prosthetist Assistants. When the employee was hired by VA, they stated there was no official title for the position of certified Assistants; therefore, they were given the title of "Orthotist/Prosthetist, uncertified."

Response: This national standard of practice does not apply to Orthotist/Prosthetist Assistants, only certified Orthotists, Prosthetists, and Prosthetist-Orthotists.

Comment: An employee suggested including a national standard of practice for certified Pedorthists.

Response: VA Pedorthists are covered under Health Technicians occupation at VA. As health technicians do not have qualification standards that require a certification or license, VA will not have a unique national standard of practice for Health Technicians.

Comment: Two employees had questions regarding how to follow ABC business practice guidelines. One employee stated ABC follows Centers for Medicare and Medicaid Services guidelines and that they currently cannot follow ABC guidelines. Another employee commented that they are instructed not to follow ABC guidelines in certain instances and that the proposed VA national standard of practice would conflict with their leadership.

Response: The national standard of practice refers to clinical roles for VA Orthotists, Prosthetists, and Prosthetist-Orthotists. VA Orthotic, Prosthetic, and Pedorthic Clinical Services business practice guidelines are not covered by the national standard of practice.

## Conclusion

VA considered all comments that it received; VA made three changes to the Orthotist, Prosthetist, and Prosthetist-Orthotist national standard of practice based on the comments. VA changed the term “patient assessment” to “patient evaluation” and the term “follow-up” to “continuation of the treatment plan” in the national standard of practice to reflect current language recommended by ABC. VA added language to clarify the national standard of practice does not apply to grandfathered employees. VA also amended the national standard of practice to include a note that the qualification standards will not change, and VA Orthotists, Prosthetists, and Prosthetist-Orthotists can hold either a certification from ABC or BOC.

The final national standard of practice for Orthotists, Prosthetists, and Prosthetist-Orthotists will be an appendix to VHA Directive 1900, VA National Standards of Practice, and accessible on the VHA Publications website at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external) once published. In accordance with VHA’s national policy process, the national standard of practice for Orthotists, Prosthetists, and Prosthetist-Orthotists will be reviewed and recertified at minimum on a five-year cycle.

## Appendix A: Draft National Standard of Practice for Orthotists, Prosthetists, and Prosthetist-Orthotists

Appendix A includes the draft national standard of practice for Orthotists, Prosthetists, and Prosthetist-Orthotists posted in the Federal Register and within VA on March 14, 2023, for individuals to provide feedback on. The final national standard of practice for Orthotists, Prosthetists, and Prosthetist-Orthotists is written into VHA Directive 1900, VA National Standards of Practice, published at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external).

1. Orthotists, Prosthetists and Prosthetist-Orthotists are health care professionals who are 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. Documentation by the Orthotists, Prosthetists and Prosthetist-Orthotists is part of the patient's medical record and assists with establishing medical necessity for orthotic and/or prosthetic care.
2. Orthotists, Prosthetists and Prosthetist-Orthotists in the Department of Veterans Affairs (VA) possess the education and certification from either the American Board of Certification (ABC) or Board of Certification (BOC) required by VA qualification standards, as more specifically described in VA Handbook 5005, Staffing, Part II, Appendix G32.
3. This national standard of practice confirms that Orthotists, Prosthetists and Prosthetist-Orthotists practice according to the Orthotist and Prosthetist standards from the American Board of Certification, available at: <https://www.abcop.org>. As of March 2022, all Orthotists, Prosthetists and Prosthetist-Orthotists in VA follow the standards associated with this national certification.
4. Although VA only requires a certification, 15 States require a State license in order to practice as an Orthotist, Prosthetist, and Prosthetist-Orthotist in that State: Alabama, Arkansas, Florida, Georgia, Illinois, Iowa, Kentucky, Minnesota, New Jersey, Ohio, Oklahoma, Pennsylvania, Tennessee, Texas, and Washington. However, all 15 States exempt Federal employees from their State license requirements.

As of March 2022, there is no variance in how VA Orthotists, Prosthetists and Prosthetist-Orthotists practice in any State.

## Appendix B: VA Under Secretary for Health Letters

Letter	Organization	Responded to VA as of November 2023*
 Letter to American Board of Certification	American Board for Certification	Yes
 Letter to Board of Certification/Accreditation	Board of Certification/Accreditation	Yes
 Letter to Alabama Board of Prosthetists and Orthotists	Alabama Board of Prosthetists and Orthotists	No
 Letter to Arkansas Board of Orthotics, Prosthetics & Pedorthics	Arkansas Board of Orthotics, Prosthetics & Pedorthics	Yes
 Letter to Florida Board of Orthotist & Prosthetists	Florida Board of Orthotist & Prosthetists	No
 Letter to Georgia Composite Medical Board	Georgia Composite Medical Board	Yes
 Letter to Illinois Department of Professional Regulation	Illinois Department of Professional Regulation	No
 Letter to Iowa Board of Podiatry	Iowa Board of Podiatry	Yes
 Letter to Kentucky Board of Prosthetics, Orthotics and Pedorthics	Kentucky Board of Prosthetics, Orthotics and Pedorthics	No
 Letter to Minnesota Board of Podiatric Medicine	Minnesota Board of Podiatric Medicine	Yes
 Letter to New Jersey Orthotics and Prosthetics Board of Examiners	New Jersey Orthotics and Prosthetics Board of Examiners	No

 Letter to Ohio Occupational Therapy, Physical Therapy, and Athletics Trainers Board	Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board	Yes
 Letter to Oklahoma State Board of Medical Licensure and Supervision	Oklahoma State Board of Medical Licensure and Supervision	No
 Letter to Pennsylvania State Board of Medicine	Pennsylvania State Board of Medicine	No
 Letter to Tennessee Department of Health	Tennessee Department of Health	No
 Letter to Texas Department of Licensing and Regulation	Texas Department of Licensing and Regulation	No
 Letter to Washington State Department of Health	Washington State Department of Health	Yes

*\*VA reviewed all comments received and made appropriate revisions to the VA standard of practice for Orthotists, Prosthetists, and Prosthetist-Orthotists in light of the comments, to include those that help VA meet its mission and goals through evidence-based practice and alternatives. This final report is a collective response to all comments; however, VA will continue to actively engage with states.*