

STAFFING

1. **REASON FOR ISSUE:** To establish a Department of Veterans Affairs (VA) qualification standard for Health Technician (Pedorthist), GS-0640, appointed under 38 U.S.C. § 7401(3), Appointments in Veterans Health Administration and 38 U.S.C. § 7405(a)(1)(B), Temporary Full-Time Appointments, Part-Time Appointments and Without-Compensation Appointments.
2. **SUMMARY OF CONTENTS/MAJOR CHANGES:** This handbook contains mandatory procedures on staffing. This new qualification standard establishes the Health Technician (Pedorthist) occupation under VA's title 38 hybrid excepted service employment system in accordance with the authority established under P.L. 111-163, Caregivers and Veterans Omnibus Health Services Act of 2010. VA Secretary has authority under 38 U.S.C. § 7402 to prescribe qualifications for occupations identified in or established under 38 U.S.C. § 7401(3), Appointments in Veterans Health Administration and 38 U.S.C. § 7405(a)(1)(B), Temporary Full-Time Appointments, Part-Time Appointments and Without-Compensation Appointments. The new standard is effective on the date of this publication. This qualification standard will be incorporated into the electronic version of VA Handbook 5005, Staffing, that is maintained on the [Office of the Chief Human Capital Officer website](#) and [VA Publications website](#).
3. **RESPONSIBLE OFFICE:** Office of Human Resources and Administration/ Operations, Security and Preparedness (HRA/OSP) (006), Office of the Chief Human Capital Officer (05), Recruitment and Placement Policy Service (059).
4. **RELATED DIRECTIVES:** VA Directive 5005, Staffing.
5. **RESCISSIONS:** None.

CERTIFIED BY:

**BY DIRECTION OF THE SECRETARY
OF VETERANS AFFAIRS:**

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APPENDIX G77. HEALTH TECHNICIAN (PEDORTHIST) QUALIFICATION STANDARD

GS-0640

VETERANS HEALTH ADMINISTRATION

1. **COVERAGE.** The following are requirements for appointment or placement as a Health Technician (Pedorthist), in Veterans Health Administration (VHA). These requirements apply to all VHA Health Technician (Pedorthist) in the General Schedule (GS)-0640 series. Health Technician (Pedorthist) administers, leads or performs work involving designing, fabricating, or fitting orthotic or partial foot prosthetic devices to preserve, replace, or restore function to patients with painful and/or disabling conditions originating at the ankle or below or with partial absence of the foot.
2. **AUTHORITIES.**
 - a. [P.L. 111-163, Caregivers and Veterans Omnibus Health Services Act of 2010;](#)
 - b. [38 U.S.C. § 7401, Appointments in Veterans Health Administration;](#)
 - c. [38 U.S.C. § 7402, Qualifications of appointees;](#)
 - d. [38 U.S.C. § 7403, Period of appointments; promotions;](#)
 - e. [38 U.S.C. § 7405, Temporary full-time appointments, part-time appointments and without-compensation appointments;](#)
 - f. [38 U.S.C. § 7407, Administrative provisions for section 7405 and 7406 appointments](#)
3. **DEFINITIONS.**
 - a. **Appointing Official.** The Human Resources (HR) Officer is delegated appointing authority, to process and authenticate notifications of personnel actions and authority to effect management approved employment actions on behalf of officials, employees, and facilities for which service is provided.
 - b. **Approving Official.** The Veterans Integrated Service Network (VISN) Director, facility Director or designee is the approving official and will determine whether to approve or disapprove the appointment of employees in the hybrid occupations.
 - c. **Experience.**
 - (1) **Creditable and Quality of Experience.** To be creditable, the experience must have required the use of knowledge, skills, and abilities associated with current Health Technician (Pedorthist) practice, be at a level comparable to Health Technician (Pedorthist) experience at the next lower

grade level of the position being filled and may be paid or non-paid employment as Health Technician (Pedorthist) in the health care field. For all assignments above the full performance level, the higher-level duties must consist of significant scope, administrative independence, complexity, and range of variety as described in this standard at the specified grade level and be performed by the incumbent at least 25% of the time.

- (2) **Part-Time Experience.** Part-time experience is creditable according to its relationship to a full-time workweek. For example, an individual employed 20 hours per week or on a half time basis, would receive one full-time work week of credit for each two weeks of service.
- d. **Journey Level.** The full performance level for this qualification standard is the GS-07 grade level.
- e. **Occupational Definitions.**
- (1) **Advanced device types.** This includes repairs to partial foot, wound care devices and provisions of Ankle Foot Orthoses (AFO) partial foot, wound care devices.
 - (2) **Clinical Oversight.** This refers to guidance and work assignments given to the employee by credentialed pedorthists, orthotists, or prosthetist/orthotists as part of the employee's development as a clinician.
 - (3) **Complex device types.** This includes repairs to custom shoes, Subtalar Control Foot Orthoses/University of California Berkley Laboratory (SCFO/UCBL), over the counter (OTC) and custom AFO, shoe modifications consisting of external flares, buttresses, sole splits, and stirrup attachment and provisions of custom shoes, SCFO/UCBL, and OTC AFO.
 - (4) **Simple device types.** This includes repairs to shoes and foot orthoses, shoe modifications consisting of external sole lifts, rockers, wedges, and extended steel shanks and provisions (includes assessment, measurement, selection, and fitting) of OTC shoes and OTC foot orthoses.
 - (5) **Supervision.** This refers to traditional administrative oversight and direction provided to employees in terms of developing performance standards, evaluating work performance as well having responsibility for recommending appointment, promotion, or reassignment and similar activities.

4. BASIC REQUIREMENTS. To qualify for appointment to this position, all applicants must possess the following:

- a. **Citizenship.** Be a citizen of the United States (U.S.). Non-citizens may be appointed when it is not possible to recruit qualified citizens in accordance with 38 U.S.C. § 7407(a).
- b. **Credential.**
 - (1) Candidates must be board certified in pedorthics by the American Board for Certification in Orthotics, Prosthetics and Pedorthics (ABC).
 - or
 - (2) Credentialed in pedorthics by the Board of Certification/Accreditation (BOC).
 - or
 - (3) Exception for Non-Credentialed Health Aid (Pedorthist).
 - (a) Non-credentialed individuals who have successfully completed a Board for Certification in Pedorthics (BCP), Commission on Accreditation of Pedorthic Education (CAPE), National Commission on Orthotic and Prosthetic Education (NCOPE), Commission on Accreditation of Allied Health Education Programs (CAAHEP) or American Board for Certification of Orthotics, Prosthetics and Pedorthics (ABC) approved pedorthic certificate program (see [Pedorthist Programs](#)) and otherwise meet ABC's eligibility requirements for certification (see [Pedorthist Candidate Guide](#)) may be given a temporary appointment as a graduate Health Aid (Pedorthist) under the authority of 38 U.S.C. § 7405(c)(2)(B).
 - (b) Non-credentialed individuals shall only provide care under the clinical oversight of a credentialed pedorthist, orthotist, or orthotist/prosthetist at or above the full performance level.
 - (c) Non-credentialed individuals may only be appointed at the entry level and may not be promoted/converted until certification is obtained.
 - (d) Temporary appointments of non-credentialed Health Aid (Pedorthist) may not be extended beyond two years or converted to a new temporary appointment.
- c. **Failure to Obtain Certification.** In all cases, Health Aid (Pedorthist) must actively pursue meeting requirements for certification starting from the date of their appointment. At the time of appointment, the supervisor will provide the Health Aid (Pedorthist) with the written requirements for certification, including

the time by which the certification must be obtained and the consequences for not becoming certified by the deadline. Failure to obtain certification during this time period may result in termination of employment.

- d. **Loss of Credential.** Management officials, in collaboration with HR Office staff must immediately relieve employees, who fail to maintain the required certification, of the duties and responsibilities associated with this occupation, which may also result in separation from employment.
- e. **Grandfathering Provision.** Employees in VHA in this occupational series or in another occupational series, under a permanent, appropriate and legal placement, performing the duties as described in the qualification standard on the effective date of the qualification standard are considered to have met all qualification requirements for the grade and/or assignment held, including positive education and credentialing/certification, where applicable. The following provisions apply to employees who do not meet all the qualification requirements:
 - (1) Employees may be reassigned, promoted up to and including the full performance (journey) level or changed to lower grade within the occupation, but may not be promoted beyond the journey level or be newly placed in a supervisory or managerial positions.
 - (2) Employees in an occupation that requires a credentialing only at higher grade levels must meet the credentialing requirement before they can be promoted to those higher grade levels.
 - (3) Employees who are appointed on a temporary basis prior to the effective date of the qualification standard may not have their temporary appointment extended or be reappointed, on a temporary or permanent basis until they fully meet the basic requirements of the standard.
 - (4) Employees who are converted to title 38 hybrid status under this provision and subsequently leave the occupation lose protected status and must meet the full VA qualification standard requirements in effect at the time of re-entry to the occupation.
 - (5) Employees initially grandfathered into this occupation, who subsequently obtains credentialing/certification that meets all the basic requirements of this qualification standard must maintain the required credentials as a condition of employment in the occupation.
- f. **Foreign Education.** To be creditable, education completed outside the U.S. must be deemed at least equivalent to that gained in a conventional U.S. program by a private organization specializing in the interpretation of foreign educational credentials.

- g. **Physical Requirements.** See VA Directive and Handbook 5019, Employee Occupational Health Service for requirements.
 - h. **English Language Proficiency.** Health Technician (Pedorthist) candidates must be proficient in spoken and written English in accordance with 38 U.S.C. § 7403(f).
- 5. OFFICIAL POSITION TITLES.** All official documents relating to a position for example, functional statements, and personnel actions must use the approved official title and grade level as described below:
- a. Health Aid (Pedorthist), GS-03.
 - b. Health Technician (Pedorthist), GS-04.
 - c. Health Technician (Pedorthist), GS-05.
 - d. Health Technician (Pedorthist), GS-06.
 - e. Health Technician (Pedorthist), GS-07.
 - f. Lead Health Technician (Pedorthist), GS-08.
- 6. GRADE DETERMINATIONS.** All individuals assigned to this occupation must meet all the basic qualification requirements above in paragraph 4 and all qualification requirements defined in the specific assignment.
- a. **Health Aid (Pedorthist), GS-03.**
 - (1) **Experience.** None beyond the basic requirements.
 - (2) **Assignment.** Employees at this grade level serve in a Health Aid (Pedorthist) entry level developmental position and work under the clinical oversight and direction of a credentialed pedorthist, orthotist or certified prosthetist orthotist (CPO). They receive entry level assignments designed to build upon the base knowledge, skills and abilities. The Health Aid (Pedorthist) receives detailed and specific training and instruction to develop proficiency in essential occupational tasks such as taking measurements, patient communication and fabrication and fitting of simple devices. The work is performed under close clinical oversight with well established procedures. They use common office software to perform basic computing tasks such as communication via email and manipulation of documents. Health Technician (Pedorthist) comply with universal precaution procedures.
 - b. **Health Technician (Pedorthist), GS-04.**

- (1) **Experience.** Six months of experience demonstrating knowledge, skills and abilities associated with pedorthic practice equivalent to the next lower grade.
- (2) **Knowledge, Skills, and Abilities.** In addition to the experience above, the candidate must demonstrate the following KSAs:
 - (a) Knowledge of patient related psychology, for example age-related competency, patient, and caregiver stressors.
 - (b) Knowledge of foundational sciences related to development of pedorthic treatment, for example anatomy, biomechanics, and pathology.
 - (c) Knowledge of materials science commonly used in fabrication, for example adhesives, plastics, composites, metals, and leather.
 - (d) Knowledge of regulations and procedures to ensure patient privacy.
 - (e) Ability to assign Healthcare Procedure Coding System (HCPCS) coding to pedorthic devices.
- (3) **Assignment.** Employees at this grade level serve in a Health Technician (Pedorthist) trainee developmental position, in accordance with clear and well-established procedures and work under the clinical oversight and direction of a credentialed pedorthist, orthotist, or CPO. Health Technician (Pedorthist) attends clinic to observe and articulate understanding of terms and diagnoses encountered. They observe and assist in the evaluation of the prescription, the assessment of the patient, preparation, and modification of casts for simple device types, repairs, and fabrication of simple devices in accordance with the input of the supervising clinician. Health Technician (Pedorthist) assists the credentialed pedorthist, orthotist, or CPO with providing instructions to patients and caregivers on the function, care, use, maintenance, and skin condition concerns related to the pedorthic device. Alongside the individual providing clinical oversight, they assist, in a trainee capacity, with the formulation and implementation of a follow up treatment plan for typical conditions. Health Technician (Pedorthist) documents workload, procedure coding, progress notes, and encounter completion into the electronic medical record, which is monitored and reviewed for accuracy by the individual providing the clinical oversight. Health Technician (Pedorthist) complies with regulations and procedures to ensure patient privacy.

c. Health Technician (Pedorthist), GS-05.

- (1) **Experience.** One year of experience equivalent to the next lower grade.

- (2) **Knowledge, Skills, and Abilities.** In addition to the experience above, the candidate must demonstrate the following KSAs:
 - (a) Skill in conducting patient assessments.
 - (b) Skill in developing simple pedorthic devices (includes assessment, measurement, selection, and fitting).
 - (c) Ability to consult with providers and allied health colleagues regarding treatment.
 - (d) Ability to assess device to ensure structural soundness and compliance with prescription and fit.
- (3) **Assignment.** Employees at this grade level serve in a Health Technician (Pedorthist) developmental position. Assignments at this grade level represent a developmental level where the individual continues developing the broader knowledge, skills, and abilities to prepare for the next developmental level. Clinical oversight is more general in nature for assignments for which the individual has demonstrated competency. Health Technician (Pedorthist) consults with supervisor or the individual providing clinical oversight for guidance not covered by instructions. Health Technician (Pedorthist) consults with the physician, therapist, and/or senior pedorthist/orthotist/prosthetist staff members to obtain and understand the prescription. They conduct patient assessments, take scans, and measurements for simple devices, prepare, and modify casts for simple devices. With minimal clinical oversight and direction of a credentialed pedorthist, orthotist, or CPO, the Health Technician (Pedorthist) provides patient services with simple devices, patient/caregiver education, and assistance with complex device types. Upon completion of the fabrication of simple and complex devices, the incumbent assists with assessment of the device for structural soundness, compliance with the prescription, fit and patient comfort. Health Technician (Pedorthist) develops a follow up treatment plan for typical conditions. They observe the casting and provision of advanced device types.

d. Health Technician (Pedorthist), GS-06.

- (1) **Experience.** One year of experience equivalent to the next lower grade.
- (2) **Knowledge, Skills, and Abilities.** In addition to the experience above, the candidate must demonstrate the following KSAs:
 - (a) Skill in developing a follow up treatment plan for complex pedorthic device types.
 - (b) Ability to process paperwork for pedorthic devices being produced and fitted by vendor.

- (c) Ability to place administrative orders with procurement staff for treatment modalities.
 - (d) Ability to assess device types for structural soundness and meeting the specifications of the prescription.
 - (e) Ability to process consults/orders.
- (3) **Assignment.** Employees at this grade level serve in a Health Technician (Pedorthist) developmental position. Assignments at this grade level represent a developmental level where the individual continues developing broader knowledge, skills, and abilities to prepare for the full performance level. Clinical oversight is more general in nature for assignments, for which the individual has demonstrated competency. Health Technician (Pedorthist) at this level possess a broad working knowledge of simple and complex device types. Health Technician (Pedorthist) independently takes scans and measurements; prepares and modifies casts and repairs and fabricates complex devices in accordance with the input of the individual providing clinical oversight. With minimal clinical oversight and direction of a credentialed pedorthist, orthotist, or CPO, they provide complex devices and deliver patient/caregiver education for them. They assess simple and complex devices for quality including structural soundness, compliance with the prescription, fit, and patient comfort. Health Technician (Pedorthist) assists with advanced device types to include quality assurance assessment. Health Technician (Pedorthist) assists with development of a follow up treatment plan for atypical conditions. In addition to the clinical duties outlined previously, Health Technician (Pedorthist) assists with administrative activities including, but not limited to, assigning Healthcare Procedure Coding System (HCPCS) coding of pedorthic devices to facilitate procurement, preparing documentation for Veterans being sent to vendors, participating in interdisciplinary teams, processing consults and generating administrative orders for procurement of pedorthic devices.

e. Health Technician (Pedorthist), GS-07.

- (1) **Experience.** One year of experience equivalent to the next lower grade.
- (2) **Knowledge, Skills and Abilities.** In addition to the experience above, the candidate must demonstrate the following KSAs:
 - (a) Skill in designing advanced pedorthic devices.
 - (b) Skill in assessing device types for structural soundness and meeting the specifications of the prescription.
 - (c) Skill in written communication.

- (d) Skill in oral communication.
 - (e) Skill in fabrication of all pedorthic device types.
 - (f) Skill in designing innovative pedorthic devices to include new and emerging technology.
- (3) **Assignment.** Employees at this grade level serve as a full performance level Health Technician (Pedorthist). The work represents independent assessment of patients with all levels of disease and disability, formulation of a treatment plan, implementation of the treatment plan, follow up of the treatment to validate outcomes and refine the treatment plan to improve patient compliance and satisfaction. Health Technician (Pedorthist) communicates and interacts with physicians, allied health professionals, patients and caregivers in various interdisciplinary clinical settings as a subject matter expert to develop the pedorthic treatment plan. Health Technician (Pedorthist) provides complex patient analyses in accordance with established procedures for patients with unusual conditions, multiple complex conditions and interrelated conditions. They assess patients for indications/contra-indications. Health Technician (Pedorthist) discuss the assessment with the physician/requesting provider for the purpose of developing the overall treatment plan with considerable influence in the development of the plan. They analyze the potential use of new and emerging technologies in designing unique or innovative pedorthic devices to accommodate or treat a wide range of complex medical conditions which include unusual problems or complications. Health Technician (Pedorthist) takes scans and measurements for advanced devices, prepares, and modifies casts for advanced devices, repairs and fabricates advanced devices and provides patient/caregiver education for advanced devices. Health Technician (Pedorthist) recognize physical abnormalities, deviations and complicating conditions with potentially life-threatening implications. The Health Technician (Pedorthist) may privilege other credentialed clinicians to provide pedorthic care based on ABC privileging requirements.

f. Lead Health Technician (Pedorthist), GS-08.

- (1) **Experience.** One year of experience equivalent to the next lower grade.
- (2) **Knowledge, Skills and Abilities.** In addition to the experience above, the candidate must demonstrate the following KSAs:
 - (a) Knowledge of operational tasks related to ABC/BOC OP&P lab accreditation, Joint Commission standards and OSHA regulations.
 - (b) Ability to lead others in accomplishing day-to-day operations.
 - (c) Ability to apply quantitative analytical principles and techniques.

- (d) Ability to provide coordination for staff development and training.
- (3) **Assignment.** For all assignments above the full performance level, the higher-level duties must consist of significant scope, complexity (difficulty) and range of variety and be performed by the incumbent at least 25% of the time. The Lead Health Technician (Pedorthist) leads three or more individuals at the full performance level of GS-7 who are exclusively performing duties within the scope of practice of a pedorthist. In addition to functions typical of the full performance level, the Lead Health Technician (Pedorthist) ensures laboratory accreditation, regulation, and compliance. They assist with developing a budget, managing inventory, and resources, planning the orthotics and prosthetics clinical schedule and managing the clinical activities of orthotic fitters and technicians within the pedorthic scope of practice. Lead Health Technician (Pedorthist) assigns work to other clinicians, provides input on performance evaluations and potential disciplinary actions, provides or coordinates training for staff; conduct site surveys of commercial pedorthic vendors, assist with the development of short- and long-range goals in accordance with local, VISN, and VHA Central Office direction and conduct quality assurance activities. Lead Health Technician (Pedorthist) collects and analyzes data to develop reports for local and Network leadership and serve as a consultant locally and within the VISN on budgeting and changes in policy

7. DEVIATIONS.

- a. An approving official may, under unusual circumstances, approve reasonable deviations to the grade determination requirements for an employee whose composite record of accomplishments, performance and qualifications, as well as current assignment, warrants such action based on demonstrated competence to meet the requirements of the proposed grade and/or assignment.
- b. The placement of individuals in grade levels or assignments not described in this standard must be approved by the Under Secretary for Health in VHA Central Office prior to placement in the position.
- c. Under no circumstances will the educational or credential requirement be waived for those occupations with a positive education requirement or when specific credentials are identified as necessary to meet minimum requirements unless an exception is annotated in the qualification standard.