

American Academy of Orthotists and Prosthetists (AAOP)
American Board for Certification in Orthotics, Prosthetics and Pedorthics (ABC)
American Orthotic & Prosthetic Association (AOPA)
Board for Certification/Accreditation, International (BOC)
National Association for the Advancement of Orthotics and Prosthetics (NAAOP)

December 18, 2008

VIA FACSIMILE AND REGULAR MAIL

The Honorable Michael O. Leavitt
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue S.W.
Washington, D.C. 20201

Re: Regulation of BIPA § 427 Regarding Qualifications for Orthotic and Prosthetic Providers and Suppliers

Dear Secretary Leavitt:

Attached please find a press release and joint statement of agreement between five of the national organizations representing the clinical, business, and quality improvement aspects of the orthotics and prosthetics profession. This historic agreement delineates for the first time a consensus position in the profession regarding the minimum education and training requirements that providers and suppliers must satisfy in order to provide custom orthotic and prosthetic care.

As the Centers for Medicare and Medicaid Services (CMS) moves forward with issuance of proposed regulations pursuant to § 427 of the Benefits Improvement and Protection Act of 2000 (BIPA), we ask for your serious consideration of this important agreement.

Further, we would like to meet with those at CMS who are on the front lines of drafting the proposed regulations in order to discuss education and training matters in more depth. We will follow up with them directly.

If you need to contact us, please call Peter W. Thomas, Esq. at (202) 466-6550. Thank you.

Sincerely,



James P. Rogers, CPO, FAAOP
President, American Academy of Orthotists and Prosthetists



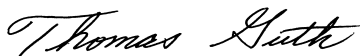
Robert S. Lin, CPO, FAAOP
President, American Board for Certification in Orthotics, Prosthetics and Pedorthics, Inc



Brian L. Gustin, CP
President, American Orthotic & Prosthetic Association



Preston N. Madler, BOCO
Chairman, Board of Certification/Accreditation, International



Thomas Guth, CP
President, National Association for the Advancement of Orthotics and Prosthetics

Encls.

cc: Kerry Weems, Acting Administrator, CMS
Tim Hill, CFO, CMS
Laurence Wilson, CMS
Kimberly Brandt, CMS
Sandra Bastinelli, CMS