



April 15, 2020

NE DHHS Licensure Unit
Attn: Credentialing Review
PO Box 94986
Lincoln, NE 68509-4986

VIA EMAIL: DHHS.407Review@nebraska.gov

Dear Technical Review Committee,

The National Athletic Trainers' Association Board of Certification, Inc. (BOC) is writing to support the Credentialing Review Program, whose goal is to modernize the current Athletic Trainer practice act in Nebraska. Athletic Trainers (ATs) are health care professionals who render service or treatment, under the direction of or in collaboration with a physician, in accordance with their education and training and the states' statutes, rules and regulations. As a part of the health care team, services provided by ATs include injury and illness prevention, wellness promotion and education, emergent care, examination and clinical diagnosis, therapeutic intervention, and rehabilitation of injuries and medical conditions.

The BOC [Practice Analysis, 7th Edition](#), (PA) is a validated study that identifies essential knowledge and skills required for entry into the athletic training profession. As defined specifically by the PA, ATs possess knowledge and skills to implement systematic, evidence-based examinations and assessments to formulate a valid clinical diagnosis or impression and determine a patient's plan of care, including referral.

The BOC supports the proposed definition of "athletic training" in statute 38-405. The proposed definition aligns with the evidence outlined in the PA which includes the following domains:

- I. Injury and Illness Prevention and Wellness Promotion
- II. Examination, Assessment and Diagnosis
- III. Immediate and Emergency Care
- IV. Therapeutic Intervention
- V. Healthcare Administration and Professional Responsibility

The BOC supports the language that specifically describes, "under guidelines established with a licensed physician" and "referral from a licensed health care provider" as these align with the BOC [Standards of Professional Practice](#) which states that ATs render service or treatment, under the direction of or in collaboration with a physician, in accordance with their training and the states' statutes, rules and regulations.

ATs render care to optimize activity and participation of patients and clients. ATs can be found anywhere there are active people. Traditionally, ATs are thought to work in professional sports, colleges and high schools, but as the profession grows so have the practice settings. Those practice settings include clinics and hospitals, the performing arts, military, industrial (manufacturing settings), public safety (police and firefighters) and more. There are well over 13,000 ATs working in these practice settings across the country. In fact, in Virginia, the Fairfax County Police Department employs ATs to care for their workforce to keep police officers on the streets protecting the public and in Pennsylvania, ATs keep Boeing employees on the job. Regardless of where an injury occurs (i.e., on a basketball court, on the streets, in a manufacturing plant, on a stage, or a military base), an AT

is educated and trained to manage it. Based on these facts, the BOC supports the revision of "athletic injuries" to "injuries and illnesses" and striking "practice site" to reflect the removal of specific athletic settings like "sports or recreation".

The BOC also supports the removal of "graduate student" in statute 38-410. Removal of "graduate student" appropriately limits the exemption to students enrolled in accredited athletic training programs and requires supervision of a licensed athletic trainer. "Graduate students" are typically employed to practice athletic training independently and should be licensed in order to protect the consumer.

In summary, the BOC supports the Credentialing Review Program and it is our hope that you will consider an update to the Nebraska Athletic Trainer Practice Act.

Sincerely,



Anne M. Minton, MA, MBA
Chief Executive Officer

Cc: Nebraska Athletic Trainers' Association

The BOC was incorporated in 1989 to provide a certification program for entry-level Athletic Trainers (ATs). The BOC establishes and regularly reviews both the standards for the practice of athletic training and the continuing education requirements for BOC Certified ATs. The BOC has the only accredited certification program for ATs in the US.