

June 16, 2020

Dear Credentialing Review Committee,

The Nebraska State Athletic Trainers' Association (NSATA) thanks the Nebraska Occupational Therapy Association (NOTA) for the ongoing and congenial dialogue regarding the proposal submitted to the Credentialing Review Program. There are several points NOTA brought forth as concerns. The following is offered to clarify those concerns.

**38-403 Injuries and Illnesses, defined.**

**NOTA expressed concerns regarding the use of “illnesses” and recommended the use of “conditions” as an alternate term**

The NSATA is currently reviewing this recommendation.

**It is recommended to use “related to athletic or recreational activity” because without it the language would be too broad and would extend past the current settings and education and training**

In reviewing other health care professions, there is no other profession in Nebraska which defines its practice by who they treat. Rather, they are defined by the conditions, afflictions or impairments by which the individual suffers, or the interventions used by those professions to influence those conditions, afflictions, or impairments.

Additionally, athletic trainers have experienced three advancements of educational standards since the last Credentialing Review completed in 1998. These standards have included didactic and clinical course work which has prepared entry level athletic trainers to work with populations who present with comorbidities and a range of populations from pediatric to geriatric. The NSATA realizes combing through the iterations of educational standards and competencies can be tedious, so a reference document that ties each of the proposed statutes to the related educational and professional development standards will be submitted for all groups to use in reviewing the educational preparation of the athletic trainer.

In addition to the advancement in education over the past 22 years, athletic trainers have extended beyond the traditional setting of athletics as well. Across the country, athletic trainers can be found working in a variety of settings including physician's offices, outpatient rehabilitation clinics, performing arts, military and law enforcement settings, and industrial settings – to name a few. Further, athletic trainers who work in Nebraska's colleges require the ability to teach educational standards without limitations from their existing scope of practice.

**All referenced states on page 33 [of the proposal] utilize language that describes the individual they may treat as an “athlete” in order to define what is an “athletic injury”**

The NSATA believes the term “athletic”, if used as part of the definition of injuries and illnesses, no longer is an accurate reflection of the services an athletic trainer can provide. On page 33 the definition from Wyoming is given as a reference. This definition of athletic injury includes: “A condition that is within the scope of practice of an athletic trainer identified by a directing physician as benefiting from athletic training services.” Georgia's definition of athletic injury is: “any injury sustained by a person as a result of such person's participation in exercises, sports, games, or recreational activities, or any activities requiring physical strength, agility, flexibility, range of motion, speed, or stamina without respect to where or how the injury occurs.”

The above is all with the understanding that the practice of athletic training will be conducted with the provisions provided in 38-404 of the proposed language, namely operating under the guidelines established with a physician or a referral from another provider (physician, osteopathic physician, podiatrist, advanced practice registered nurse, physician assistant, dentist, or chiropractor) that can deem whether an individual would benefit from athletic training services.

**Recommendation to strike “as a result of their education and training”**

Although reworded, the spirit of this phrase has been in statute for the past 22 years and the NSATA's concern with removing this wording is athletic trainers would only be allowed to practice at the profession's entry-level and fail to acknowledge the potential for post-professional advancement of knowledge and skills. Athletic trainers must complete extensive professional development requirements, as well as have opportunities to advance their practice through upskilling and post-professional education opportunities.

**38-404 Athletic Trainer, defined.**

**NOTA suggested the inclusion of physical therapists and occupational therapists in the list of health care professionals that can refer to athletic trainers.**

The NSATA recognizes the collaborative relationships between athletic trainers, physical therapists and occupational therapists and look forward to seeing those relationships continue to work to the benefit of the individual seeking care. The NSATA will continue to review this recommendation under the consideration of what is found to be in the best interest of patient safety.

**38-405 Athletic Training, defined.**

**NOTA recommends the use of “treatment” versus “therapeutic”**

The NSATA is currently reviewing this recommendation.

We appreciate the feedback we have received from NOTA and look forward to ongoing dialogue as the NSATA continues to navigate the credentialing review process.

Sincerely,



Nebraska State Athletic Trainers' Association  
Michael Roberts, MA, ATC  
7325 N 106th Ave  
Omaha, NE 68122  
402-680-1599  
407@nsata.org

CC: Nebraska Occupational Therapy Association