



Recommendation 6. The General Assembly should direct the Occupational licensing Commission, in consultation with the affected occupational licensing agencies, to develop a plan to consolidate each of the ten identified occupational licensing agencies with another regulatory entity.

Response: A centralized board cannot/does not have the expertise/ability to manage the specifics required of this specialized board for this specialized purpose. Also, the recommendation that consolidation is the better plan is based on the premise that centralization is naturally preferred over decentralization to promote a regulatory scheme to license occupations; a recommendation that is fatally flawed due to the absence of a description of a course of action that is fundamental to the recommendation.

The **North Carolina Board of Athletic Trainer Examiners** has been created by the North Carolina General Assembly to provide persons in need of its services with assurance that the professionals providing those services do so safely and competently.

A primary challenge for this profession is not only to address emergency medical care that extends to life threatening situations for all ages, but to school young participants in sports who need to learn how to care for their health on and off the field. Athletic trainers are on the front line of health care. They are promoting good diet, overseeing athletic activity to avoid and reduce injury, recognizing injuries such as concussions that lead to death if not diagnosed promptly and properly, and being available in situations, especially school athletic programs, that require emergency aid. It is very important to note that licensed athletic trainers bring their special health care skills to an arena where full time medical doctors are often unaffordable, to schools. By virtue of the protocol between doctor and licensed athletic trainer, access to the highest level

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of care is made almost immediately available for our most vulnerable population, our children.

The Program Evaluation Division recently reviewing the Board concluded that the services provided by these professionals meet the overarching objective of licensing: To protect the public from physical or economic harm. It is for this purpose that the Board was created.

Currently, there is an ever growing appreciation for the demands of higher performance imposed on non-professional as well as professional sport participants. The greater intensity of the sport creates an atmosphere of competitiveness, and some would argue it creates a greater risk of injuries such as concussions. Only in recent years have participants, as well as the public at large, become aware of some of the long term effects of concussions. The entire area of sports medicine is expanding and requiring greater knowledge on the part of the licensed athletic trainer, further reinforcing the need for a Board to insure a high level of education and clinical skill.

But attendant to this need for competent services, is the need to provide these services with the highest degree of ethical standards. The current relationship of the licensed trainer with the student, is one of educator, motivator, and counselor. Uniquely, it invokes a close physical and psychological connection and consequently, a vulnerability. From this relationship arises the need for special education and guidance to the licensed athletic trainer and protection to the student from the development of improper personal, even sexual relationships. With the public recognition of the need for athletic opportunities for both sexes and Title IX requiring equal access, the educational community requires accountability that follows the professional, independent of one specific employment context.

While agreeing that the value of the regulation must merit the cost, the Board would note that the cost of accountability to the Board has been carefully considered and approved by the General Assembly. Furthermore, it is self-supporting. The cost of regulation of the field is carried by the professionals themselves who believe it is of paramount importance to set out a level of education and skill that is enforced by a disciplinary process. The professional field has greater confidence in the basic premise that is fundamental to our judicial system: Judgment by one's peers. The best person to judge whether or not an athletic trainer has met the standard of care of the profession is another athletic trainer. The test is: What would a reasonable, prudent athletic trainer do? The Board takes the position that protection of the public is driven by the goal of justice for both parties: the responding professional and the complainant. To obtain this goal, the profession itself is willing to bear the cost to inform the public of these standards and take steps for its protection.

However, the Division has recommended that this Board be subsumed by another regulating entity. The Board respectfully disagrees with this recommendation, a recommendation based on the premise that centralization is superior to maintenance of the Board in its current, naturally forming, independent capacity. To support this recommendation, it fails to fully provide a plan of consolidation. Also, it cites only a “snapshot” of two factors: The Board’s annual revenue and its financial solvency as the bases for consolidation.

The Board would answer that these two indicators reflect a solvency of this Board for this year and years to come based on current expenses and rate of expenditures. Therefore, the Board can only guess at the basis for evaluating the Board’s solvency based on a “...cumulative score of five or less...” For this reason the Board would like to reserve the right to supplement this response for a later time, if necessary.

This Board has not reached its full potential. It is evolving and growing as is the fact that public awareness of the need for the services of the licensed athletic trainer is growing from scientific studies of the effects of sports injuries and demands on non-professional as well as professional participants are compiled. Those recommending that centralization of governance of the field of athletic training is better due primarily to greater effectiveness and efficiency are promoting an idea at the expense of a reality. The reality is that a change in a form of government is not evaluated or best obtained with only a time sheet and column of numbers. Government by the people is organic. It grows to meet the needs of the community. The community can be great or small. It can be the size of a State to be administered as a geographic unit and defined as a group of persons who provide a specific set of professional services. The community may be a growing community. It may be defined by a growing awareness of the need for professional standards and accountability. The North Carolina Board of Athletic Trainer Examiners would urge that the need for this Board to remain an independent board is greater than ever and requests that it not be consolidated with another entity that regulates occupations in the same industry.

Thank you for the opportunity to respond to the recommendation.

A handwritten signature in black ink, appearing to read "Kevin Allran". The signature is fluid and cursive, with a large initial "K" and "A".

Kevin Allran, Chairperson
NCBATE