

**Policy 5112: Athletic Trainers in the Public Schools of West Virginia Executive Summary  
Comment Log**

**November 15, 2019-December 16, 2019**

**Action**

A/S Comment was accepted and supports the proposed policy.

A/C Comment was accepted and resulted in changes to the proposed policy.

N Comment was not accepted.

<b>Date</b>	<b>Commenter</b>	<b>Comments</b>	<b>Action</b>	<b>Rationale</b>
<b>§126118-1. General.</b>				
11/15/2019 12:10 PM	Brittany Domingo, ATC Athletic Trainer- Princeton Senior High School	The use of a Limited Football Trainer puts the athletes at risk from day one. Limited Football Trainers do not have the same education and skills set when compared to an athletic trainer.	N	Comment does not reflect any proposed changes to Policy 5112.
2019-11-17 15:43:06	Cory Rueckert Athletic trainer Poca Wv	The state needs to hire certified athletic trainers at every high school and eliminate the limited football trainer. Putnam county has full time athletic trainers at all four of their high schools and the state should follow suit. How important are the lives of our children? Stop letting people who aren't qualified in a field oversee our young athletes. Would the hospital let an athletic trainer sit in for a nurse? No. Would the ambulance authority allow an athletic trainer to sit in for a paramedic? No. Why are we letting it happen the other way around? If you say we can't afford athletic trainers at every school I would say maybe we can't afford the sports. Protect the children. Hire full time certified athletic trainers at every high school. For once let WV be at the forefront of something.	N	Comment does not reflect any proposed changes to Policy 5112.
11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC	The use of a limited football trainer (LFT) places the health & safety of football players at risk by permitting non-certified personnel with no	N	Comment does not reflect and proposed changes to Policy 5112.

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	Athletic Training Program, Director Concord University	specialty training to perform skills for which they have received education or training. It also completely disregards the safety & well-being of student-athletes participating in other high school sports; some of which, like wrestling, require time sensitive health & safety-related actions & decisions because of the sport's rules.		
2019-12-03 15:01:13	Crissy Mace WV	I am a former cheerleading and girls track coach in West Virginia, with 16 years of experience. Throughout those years, I saw MANY injuries, especially in cheer. We never had an athletic trainer present at any of our practices or competitions. The WVSSAC did provide training for injuries, but they didn't follow up to make sure the videos and/or literature was reviewed. I am not qualified to attend to sports emergencies, thus putting myself in situations where I could have potentially put the athlete at further risk for injury. NO other female sports or other male sports in West Virginia are required to be covered by any type of athletic trainer or medical professional. Do they not deserve the same care and safety as the boys on the football field?	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-03 15:05:10	Brent Roark Assistant Athletic Trainer Wheeling University Wheeling WV	Athletic Trainers help protect athletes from serious injuries if not detected as fast. Athletic Trainers help take the liability off from coaches making mistakes in the medical field.	N	Comment is only a statement and provides no resolution/solution to any proposed changes in Policy 5112.
2019-12-15 21:23:20	Aimee Carpenter New Martinsville WV	As a parent of a child who is wanting to play football, basketball, and baseball, it scares me knowing the people that are responsible for making life saving/altering decisions for him aren't certified athletic trainers. Trainers spend their whole college	N	Comment is only a statement and does not reflect any proposed changes to Policy 5112.

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		years training and sharpening their skills on athletic training and injuries. Our kids deserve to have a fully certified trainer on staff, no matter the cost. Other health care providers are good at their jobs, however, their skills are for different areas of expertise, however, would you want an eye dr performing a surgery..... I know I wouldn't! But, one could say, he's a doctor and had medical background. No, that's not his area of certification and/or specialization. We need certified trainers in our schools if we are going to continue having organized sports teams in WV. It's a must, it's a liability, and it's a no-brainer.		
2019-12-16 13:25:47	Zach Garrett Graduate Athletic Training Program Director Marshall University Huntington WV	Eliminate the limited football trainer. These individuals are not required to perform any continuing education as it relates sports medicine and most do not know best practices when it comes to managing sport injury. The workshop provided by the WVSSAC is a joke and does not improve patient care. Additionally, allowing individuals to act in this is capacity confuses the understanding of what an athletic trainer can do and puts student athletes at risk in the state.	N	Comment does not reflect any proposed changes to Policy 5112.
<b>§126118-2. Purpose.</b>				
11/15/2019 12:10 PM	Brittany Domingo, ATC Athletic Trainer- Princeton Senior High School	All sports at the high school level should have an athletic trainer (AT) present in case of an injury or medical emergency. Injuries can happen at any time and in any sport. Using a limited football trainer does not ensure appropriate health oversight is being provided.	N	Comment does not reflect any proposed changes to Policy 5112.
11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC	2.1: The use of an LFT contradicts the statement of "ensure that appropriate health oversight is provided" by allowing individuals without the	N	Comment does not reflect and proposed changes to Policy 5112.

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	Athletic Training Program, Director Concord University	appropriate training to perform as an athletic trainer (AT). The purpose should also include all interscholastic high school student-athletes, not just football.		
2019-11-28 10:53:38	Nicholas Dailey Treasurer West Virginia Athletic Training Association Lewisburg WV	While Football coverage is absolute necessity, I wonder how this purpose aligns with title 9? Football Only? Is that the best that we can do with a fraction of our student athlete population? I firmly believe that it is possible to fund full time ATCs for all WV HS Sports, through partnerships, contracts, and sponsorship with health networks, Healthcare providers and other businesses with the common interest of our best and brightest on the sporting field. I also question the use of the word oversight... Healthcare in this capacity should be direct and very involved, not simply overseeing**.	N	Comment does not reflect any proposed changes to Policy 51120
2019-12-03 15:01:13	Crissy Mace WV	Again, why is ONLY football, a MALE sport, required to be covered? Why are female athletes being discriminated against in our state? Not only is this a glaring student safety issue, this is clearly a Title 9 issue.	N	Comment does not reflect any proposed changes to Policy 5112 as it only asks questions, but does not provide a solution.
2019-12-03 15:05:10	Brent Roark Assistant Athletic Trainer Wheeling University Wheeling WV	Athletic Trainers help protect athletes from serious injuries such as a concussion, from progressing worse by noticing the signs and symptoms. EMTs, Nurses, etc. are not specialty trained to perform orthopedic special testing or rehabilitation of sports injuries.	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-08 13:32:49	Pam Schield Athletic Trainer Salem University Salem WV	What is a limited athletic trainer authorization? The profession of athletic training is unique and has quite different content requirements for licensure than many of the professions designated. None of the professions providing health care have the same responsibilities for said health care. They all	N	Comment reflects a question and no proposed changes to Policy 5112.

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		<p>have different first aid care regarding licensure requirements and duties. Further, the ethical and moral charters provide different responsibilities in their respective form of their profession. To put forth language suggesting rainer belongs to all of these professions discredits not only the athletic trainer profession but of others as well. Athletic trainers</p>		
<p>2019-12-06 U.S. Mail</p>	<p>Kari Williams Athletic Trainer/Teacher Hampshire High School</p>	<p>Why are we only concerned with “appropriate health oversight” being provided for football programs?</p>	<p>N</p>	<p>Comment is a question and does not reflect any proposed changes to Policy 5112.</p>
<p>2019-12-11 19:27:11</p>	<p>Brittany Iseminger-Smith Athletic Trainer, Regional Coordinator Pivot Physical Therapy Martinsburg WV</p>	<p>Pivot Physical Therapy’s stance on Policy 5112 aligns with West Virginia Athletic Trainer Association’s stance, not supporting the role of the “limited football trainer” as appropriate medical coverage for West Virginia Public Schools for the following reasons:</p> <p>- Employing "Limited Football Trainers" brings up an issue of equality; for example “Limited Football Trainers” only cover football, however the sports for known for concussion prevalence are football, wrestling, girl’s soccer, boy’s soccer and girl’s basketball. Two female sports are in the top 5 for concussion prevalence. Hiring an athletic trainer instead of a “Limited Football Trainer” ensures that not only are the football players being looked out</p>	<p>N</p>	<p>Comment does not reflect any proposed changes to Policy 5112.</p>

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		<p>for, but all sports, especially considering females who play soccer or basketball are at risk.</p> <p>Harmon, Kimberly G. et al. American Medical Society for Sports Medicine Position Statement: Concussion in Sport [online]. Clinical Journal of Sport Medicine: 2013;23(1):1–18 doi: 10.1097/JSM.0b013e31827f5f93</p> <p>- Coaches are not required by the WVSSAC to be CPR/AED certified, so an athletic trainer for every high school, for every sport should be required to protect ALL athletes, as sudden cardiac arrest is the leading cause of death in youth athletes in all sports, not limited to football.</p> <p>Drenzer, J. A et al. Inter-Association Task Force Recommendations on Emergency Preparedness and Management of Sudden Cardiac Arrest in High School and College Athletic Programs: A Consensus Statement. Journal of Athletic Training 2007;42(1):143–158</p>		

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2019-12-15 22:17:04	Anonymous	<p>(2.1) "The purpose of this policy is to ensure that appropriate health oversight is provided for student athletes in football programs in West Virginia public schools."</p> <p>While a multitude and team of healthcare professionals are necessary to help keep student-athletes healthy and on the playing field, not all of these professionals receive the necessary training to treat and manage the variety of injuries and scenarios seen on a day-to-day basis in the world of athletics. All healthcare professionals are important and serve a specific role in a specific time and place, and it is unfair to ask someone without the proper training to step in to a job with such responsibility attached to it and perform tasks and duties they are not trained to do--and it is also unfair to the student-athletes on the receiving end of this. Athletic Trainers are skilled and knowledgeable healthcare professionals who are trained to provide services and care in a variety of settings, all while communicating with other healthcare professionals to ensure our student-athletes receive the best care and treatment possible. Let us do the job we have been trained to do so that other healthcare professionals can do the job that they have been trained to do.</p> <p>How much is a childs life worth?</p>	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-16 08:28:14	Tom Belmaggio Coordinator of Sports Medicine Marshall Sports	This rule for having appropriate health care coverage for football only is a Title IX violation. WVDE needs to review this rule so that is applies to	N	Comment does not reflect any proposed changes to Policy 5112.

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	Medicine Institute Huntington WV	all student-athletes in the State of WV and not just to football players		
2019-12-16 13:25:47	Zach Garrett Graduate Athletic Training Program Director Marshall University Huntington WV	There needs to be appropriate health oversight for all student athletes! Not just football! There are mountains of data showing injury rates/risk are much greater in a variety of sports. This also neglects the need for female coverage. This is a Title 9 violation as its basically stating mens health care coverage is more important than females. As a professional, I can tell you Ive seen more severe concussions in men and womens soccer in comparison to football.	N	Comment does not reflect any proposed changes to Policy 51122.
<b>§126118-3. General Rules Requirements.</b>				
11/15/2019 12:10 PM	Brittany Domingo, ATC Athletic Trainer- Princeton Senior High School	3.2- All middle school student athletes should have access to the high school athletic trainer.	N	Comment does not reflect any proposed changes to Policy 5112.
11/15/2019 12:10 PM	Brittany Domingo, ATC Athletic Trainer- Princeton Senior High School	3.3- Superintendents should be required to have an athletic trainer work with other sports.	N	Comment does not reflect any proposed changes to Policy 5112.
11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC Athletic Training Program, Director Concord University	3.1: LFT & include student-athletes in all high school sports, not just football.	N	Comment does not reflect and proposed changes to Policy 5112.
11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC Athletic Training Program, Director Concord University	3.2: All student-athletes in grades 5, 6, 7, & 8 should be granted access to the high school AT.	N	Comment does not reflect any proposed changes to Policy 5112.

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11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC Athletic Training Program, Director Concord University	3.3: Employing an AT should be required for all schools that sponsor athletic events. If the a school cannot afford an athletic trainer it cannot afford an athletic program. Employing an AT is a safety issue just as is wearing a helmet.	N	Comment does not reflect any proposed changes to Policy 5112.
2019-11-28 10:53:38	Nicholas Dailey Treasurer West Virginia Athletic Training Association Lewisburg WV	3.1 - ATC in WV will have licenses, not just registration thanks to SB 60 per regular session 2019.  3.2 and 3.3 - We are setting another low bar, I believe that it is possible to find an ATC for every school and program. With as many Clinics, healthcare providers, and health networks that have the capacity to hire in and contract out ATC services, every school could be covered by the gold standard for athlete care.	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-03 15:01:13	Crissy Mace WV	My child will be participating in middle school sports next year. I am glad it will be encouraged for middle schools to provide athletic trainers. I would much rather it be required. Does he not deserve an athletic trainer since he will only be in middle school? Is his safety on the playing field not important?	N	Comment does not provide a resolution to any changes proposed in Policy 5112 as it just asks questions with no resolution.
2019-12-08 13:32:49	Pam Schield Athletic Trainer Salem University Salem WV	Please insert athletic trainer for trainers. What is a limited athletic trainer authorization?	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-06 U.S. Mail	Kari Williams Athletic Trainer/Teacher Hampshire High School	3-1 Should say Licensed Athletic trainer instead of registered. – “ Limited Athletic Trainer” is not an proper term and should be rephrased as “ Football limited trainer.” Athletic trainer is a title reserved	N	Comments do not reflect any proposed changes to Policy 5112 and would require a change in WVSSAC policy as well as local district/school policy and procedures on staffing.

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		<p>for those with a college degree and who have passed their BOC exams. S126-118-3. General Rules Requirements It has always been explained to us that we “serve” during Varsity Football practices and games and this means being Present on the field with the team. With the wording changed to “grades 9, 10, 11, 12: I am not sure how we will “serve” both varsity football practice and a JV or Freshman game on the same day and time especially if Jv or Freshman are away.</p>		
2019-12-15 22:17:04	Anonymous	<p>(3.1) Limited football trainers do not have the necessary training to manage and treat student-athletes and the scenarios seen on a day-to-day basis. Limited football trainers should not be an option for providing healthcare services to our student athletes.</p> <p>(3.3) This is a Title IX violation. How do you justify only mandating medical coverage for one sport in high school athletics? Girls soccer has a higher concussion rate than football, so why are we not mandating coverage by an Athletic Trainer who has the skillset to manage and rehabilitate a concussion for the sport with the highest rate of concussions?</p> <p>How much is a child's life worth?</p>	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-15 23:17:16	Elisabeth Arthur South Charleston WV	Encourage needs changed to required.	N	Comment does not support any proposed changes to Policy 5112.
2019-12-16 08:28:14	Tom Belmaggio Coordinator of Sports Medicine	Athletic Trainers are no longer "registered" in WV. As of January 1st, 2020 all athletic trainers must obtain Licensure from the West Virginia Board of	N	Comment does support any proposed changes to Policy 5112.

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	Marshall Sports Medicine Institute Huntington WV	<p>Physical Therapy.</p> <p>The role of most limited football trainers lacks the educational competencies that is needed to provide medical oversight within interscholastic athletics. Due to scope of practice a limited athletic trainer can not evaluate, diagnosis, or treat concussions which could be a potentially life threatening injury. WVSSAC Concussion Rule 127-2-14 only allows licensed health care providers who have the appropriate training in evaluating and managing concussions, this includes MD, DO, ARNOP, PA-C, ATC, and PT. This rule conflicts with the role of most limited football trainer who do not hold these credentials. Furthermore, the limited football trainer is allowed to provide medical expertise to a contact/collision sport where concussions are prevalent. How are these individuals managing a concussions? How many concussions go undiagnosed due to lack of management and poor education? This is not in the scope of practice of most limited football trainers so I believe it is safe to say there is mismanagement of concussions and there are concussions that are not properly diagnosed by these individuals.</p>		
2019-12-16 13:25:47	Zach Garrett Graduate Athletic Training Program Director Marshall University Huntington WV	<p>3.1 needs to state licensed AT and eliminate limited football trainer.</p> <p>5.1 What the accountability here? Whos assuring this is happening? There was a near death in Mingo county 2 years ago and nothing happened to the coach or school for this mishap. Its perfectly fine to</p>	N	Comment does not reflect any proposed changes to Policy 5112 and makes in general statements.

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		have a rule, but if there is no enforcement whats the point? The SSAC throws it back at you and youll turn around and throw it on them. There is zero accountability for schools that don follow the rules.		
12/16/19 U.S. Mail	Don Dellinger Deputy Superintendent Berkeley County Schools	Changing from senior high school (Varsity) to grades 9-12, schools will be required to cover Varsity, JV, and Freshman teams. This will require at least 2 athletic trainers if the Varsity is practicing and the others have away games. UNFUNDED MANDATE	N	Comment does not reflect any proposed changes to Policy 5112. Policy currently states an Athletic Trainer must be present at all high school Football practices. Therefore a trainer should be in place for those football teams/events in that county.
<b>§126118-4. Licensure Governing Athletic Trainers (Policy 5202).</b>				
11/15/2019 12:10 PM	Brittany Domingo, ATC Athletic Trainer- Princeton Senior High School	4.1- Valid licensure with the WV Board of Physical Therapy as of Jan 2020.	N	Comment does not reflect any proposed changes to Policy 5112.
11/15/2019 12:10 PM	Brittany Domingo, ATC Athletic Trainer- Princeton Senior High School	4.3- Other medical providers should not be able to come in and do the job of an athletic trainer (AT). ATs are not allowed to walk into the other professions and begin doing their respective jobs.	N	Comment does not reflect any proposed changes to Policy 5112.
11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC Athletic Training Program, Director Concord University	4.1: In 2020 ATs will be required to have licensure in the state of WV, not registration.	N	Comment does not reflect any proposed changes to Policy 5112.
11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC Athletic Training Program, Director Concord University	4.3: Just like ATs cannot perform jobs/skills related to other health care professions, is should not be permissible for other health care professionals should not be permitted to perform or work in athletic training roles.	N	Comment does not reflect any proposed changes to Policy 5112.

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11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC Athletic Training Program, Director Concord University	Remove 4.3.a.	N	Comment does not reflect any proposed changes to Policy 5112.
2019-11-28 10:53:38	Nicholas Dailey Treasurer West Virginia Athletic Training Association Lewisburg WV	4.3 - Many of the listed professions including Chiropractor, RN, OT, Paramedic and EMT will not have enough exposure and experience to determine some of the more difficult diagnoses seen on the athletic field; i.e. Concussions. While they are instrumental in the Allied Athletic Healthcare team, I believe that ATC is the best and only option to be the first point for our sidelines. It is a constant and evident liability to have a limited football trainer who often practices in controlled settings (clinic, healthcare office), has a relative on the team being cared for, or may or may not have coaching responsibilities whether assumed or implied! This is a great ethical and liable dilemma. There are many of these professionals that are overqualified for the post, but they are often few and far between!	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-02 22:36:41	Jeffrey Currie Teacher/Coach Kanawha Co Schools Elkview WV	I have been coaching for 13 years and we have had a trainer for our football team all of those years. We have some really good ones and right now we have the best one I have been lucky enough to work with. The problem is not every school and team can say the same thing. Our players are always in the best of hands, but there are many schools throughout the state that don't have that reassurance. Also when people are in charge of making sure the kids are healthy enough to play	N	Comment does not relate to any proposed changes to Policy 5112.

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		don't have the correct certifications, mistakes can be made even though that person had the best of intentions. These sports are dangerous enough but by having certified athletic trainers in all schools it will help everyone involved be a little safer.		
2019-12-03 15:05:10	Brent Roark Assistant Athletic Trainer Wheeling University Wheeling WV	Having BOC Certified Athletic Trainers in high schools is a necessity in order to help prevent injuries as well as recognizing serious injuries such as concussions. Athletic Trainers are trained to respond in emergency care situations as well as chronic injuries. Coaches are not trained in taking care of medical documentation and the liability that comes with the injuries. Athletic Trainers take all of the liability off the coaches so anything medical will go through the medical professional instead.	N	Comment does not reflect any proposed changes to WVBE Policy 5112.
2019-12-03 17:57:30	Stephen armitage Country roads physical therapy Fairmont Wv	I'm not quite sure how after every effort made to make athletes safer, that we remove athletic trainers from high schools to save money on our education budget. The money you "save" from removing ATC staff from high schools is highly negligible from the tens to hundreds of thousands that will hit the Medicaid and state run insurance from preventable injuries, ease of access to care throughout the length of already sustained injuries, concussion management and the list goes on. Find your cuts elsewhere. Stop spending thousands of dollars on furniture and redecorating state offices. Support the youth. I am not even sure how legislature like this even begins. Why not just make West Virginia 50th in another abysmal category.	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-08 13:32:49	Pam Schield Athletic Trainer	Please revise all wording from rainer to the professional title athletic trainer. The profession	N	Comment does not reflect any proposed changes to Policy 5112.

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	Salem University Salem WV	calls for athletic trainers not football trainer. The title using rainer in description of this profession is unwarranted. Trainer does not equate to the athletic training profession. The unique requirements and study and research in athletic training demands a choice of words other than rainer. Health care provider would provide a broader summary for those who could provide health care for student athletes. That being said, it is imperative the state of West Virginia demand the full time hire of athletic trainers who have been nationally licensed and have a skill set specific for the athletic population not only in football but in all sports throughout the academic school year. Further, policy 4.3e suggests the limited football trainer attend an athletic trainer workshop. Although it is not clear what is presented in this workshop by the language in this policy, it does suggest another degrading element to the profession of athletic trainers who study the requirements for the profession in 4 to 5 year Bachelor and/or Masters University accredited programs. Is this workshop a first aid workshop? Certified and licensed athletic trainers abide by 7 practice standards and 6 codes of professional responsibilities. The work of athletic trainers is more than just a workshop.		
2019-12-06 U.S. Mail	Kari Williams Athletic Trainer/Teacher Hampshire High School	EMTs should not be acceptable "trainers." They have no training in diagnosing or treating injuries. They are trained to stabilize and transport. It is out of their scope of practice. Speaking as a former EMT myself.	N	Comment does not reflect any proposed changes to Policy 5112.

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2019-12-11 19:27:11	Brittany Iseminger-Smith Athletic Trainer, Regional Coordinator Pivot Physical Therapy Martinsburg WV	-The "limited football trainer" should be deemed a first responder as they have not taken the BOC to be called a certified athletic trainer and therefore should not be considered a licensed athletic trainer. "Limited Football Trainers" should either remain "certified" or "Limited Football Trainer" as they are only required to attend the WVSSAC athletic trainer clinic, according to WVDE Title 126. This should not be considered appropriate medical coverage.	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-15 21:23:20	Aimee Carpenter New Martinsville WV	Please require all sporting events in WV to require a certified athletic trainer!	N	Comment would require a change in WVSSAC Policy and Fiscal Notice changes. Comment does not reflect any proposed changes to Policy 5112.
2019-12-15 22:17:04	Anonymous	(4.3) None of the healthcare providers listed as possible limited football trainers receive the same training as Athletic Trainers, nor do they possess the same skillset as Athletic Trainers. Let Athletic Trainers do the job we were trained for so other healthcare providers can do the job they were trained for.  How much is a child's life worth?	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-16 13:25:47	Zach Garrett Graduate Athletic Training Program Director Marshall University Huntington WV	This needs to be cleaned up to assure qualified individuals are allowed to perform in this role. Also, licensure for ATs starts effective January 1, 2020. For the exception of a paramedic and EMT no other healthcare professional on this list is required to receive training in sports medicine emergency care (and I'm being generous with including them). Also, what training does an LPN, Occupational Therapist, and RN have as it relates to handling orthopedic evaluation, assessment, and injury management?	N	Comment does not reflect any proposed changes to Policy 5112.

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		<p>The athletic training profession is a niche area that many of these health care professionals don receive training in such as best practices for handling heat related illness. There are several of these individuals on this list that cannot make a return to play call with a concussion in accordance to the legislative law and WVSAAC rules. By allowing this to occur, you are putting student athletes at risk because you are assuming John Doe, LPN knows he can allow a kid to return to play after a concussion, let alone do they know how to perform an appropriate evaluation?</p> <p>4.3-Require counties to pay a reasonable wage for this service. Thats part of the reason they can ever find anyone. The entry level to the profession of athletic training is now a Masters degree. Paying someone \$1000 to cover football is a slap in the face to our profession. Also, force schools to re-post this every year. There are some limited football trainers that just get the job every year and thats not best practice by counties.</p> <p>4.5-The student support certificate needs completely eliminated. This is obscene that you e trying to keep this in here as it would be against the law/rules for licensure and BOC practice standards.</p>		
<b>§126118-5 General Role Description.</b>				
11/15/2019 12:10 PM	Brittany Domingo, ATC Athletic Trainer- Princeton Senior High School	5.1- ATs obtained a college degree to have this title. AT's possess the skills to do the job at hand while other health professional have not had the same type of education.	N	Comment does not reflect any proposed changes to Policy 5112.

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11/15/2019 12:10 PM	Brittany Domingo, ATC Athletic Trainer- Princeton Senior High School	5.1 & 5.2- Remove football and replace with all sports.	N	Comment does not reflect any proposed changes to Policy 5112.
11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC Athletic Training Program, Director Concord University	Remove all statements related to LFT (5.2)	N	Comment does not reflect any proposed changes to Policy 5112.
2019-11-28 10:53:38	Nicholas Dailey Treasurer West Virginia Athletic Training Association Lewisburg WV	<p>5.1 &amp; 5.2 There is such a great contrast between the two roles! Its obvious and should be noted that limited trainer capacities are far inferior in the role they are trying to assume, albeit they have a place in the athletic healthcare umbrella, ATC is the best scenario for our athletes.</p> <p>5.2 - I strongly question and highly doubt the professions listed in the preceding sections have the capabilities to properly diagnose many of the issues that arise in athletic contest, especially and specifically concussions among other injuries. How many concussions have been improperly diagnosed or worse, MISSED!!! Ive seen several accounts first and second-hand where EMT and other limited football trainers have gone against best practices and attempted coup of the ATC and even the Limited Football trainer in response to obvious symptoms that warrant diagnosis of concussion.</p> <p>I hope that this policy can be strengthened to the best possible standards which its my opinion that the only option for our youth should be an ATC for</p>	N	Comment does not reflect any proposed changes to Policy 5112.

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		<p>every sport. It is the stance of the WVATA that the limited Football role should be done away with as many of the listed professions are not ready nor capable to fill this specific and special role in the healthcare system! OTs, Chiropractors, LPN, RN, even some PTs, and PAs might be working in roles that don expose them every day to the specific needs of what they will encounter on the sidelines! This is a dangerous and liable standard to set for our young athletes.</p> <p>***Language Correction*** 5.3 - Coach needs to be entirely struck from this paragraph! Its obsolete language and goes against the ethical principles of the role this Athletic Training position is trying to execute! It contrasts heavily with 6.1 which state that "an individual serving as an athletic trainer or individuals with limited football trainer authorization may not have simultaneous coaching responsibilities in the same sport". Which is how it should be! It is rumored that the acting limited football trainer in Roane County had some coaching responsibilities and thus which is why the late young athlete was left alone with another athlete. I hope this isn the case, but if it is, this policy language needs to be highly stressed!!! Not to mention, I question the ethical objectivity of anyone with ties to the team other than medical professional! Too often we see decisions being lead, guided, or persuaded by influence from coaching or team perspective because a team "needs" an athlete to win... Please set the standard, for even the NCAA to follow! Healthcare</p>		

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		<p>needs to be independent from the athletic department and its influences!</p> <p>5.3 - I assume that should an ATC be female, and take a maternity leave, the county should hire a full time atc or limited football trainer to cover the post outright? The 3 consecutive day rule would be hard to keep up with in a similar scenario!</p>		
2019-12-02 19:24:33	Jenni Johnson President West Virginia Athletic Trainers' Association Nitro WV	The "limited foot ball trainer" and nationally certified athletic trainer cannot have the same roles based on the lack of appropriate education of the "limited football trainer." This is why WV is leading the nation in the total number of athletic related deaths. At what point is the safety and well-being of our student athletes going to become a priority for our great state. Sub-standard care based on lack of funding is not acceptable anymore. What is the price tag on a childs life??	N	Comment does not relate to any proposed changes to Policy 5112.
2019-12-03 15:01:13	Crissy Mace WV	A limited trainer or temporary trainer does not have the same knowledge, training, or expertise of a Certified Athletic Trainer. You make this clear in your description in section 5.1. All students deserve this level of care, and parents deserve this peace of mind while their child is participating in sports in our state.	N	Comment does not reflect/support any proposed changes to Policy 5112.

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2019-12-08 13:32:49	Pam Schield Athletic Trainer Salem University Salem WV	Policy statement 5.3 suggests other professions replace that duty of the athletic trainer. This language, ....to fulfill the duties of..., suggests the professions listed are the same and as stated prior, this is not the case. Athletic trainers have a unique set of skills to care for student athletes as described in the Athletic Trainer Board of Certification Standards of Professional Practice.	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-11 19:27:11	Brittany Iseminger-Smith Athletic Trainer, Regional Coordinator Pivot Physical Therapy Martinsburg WV	See above, as the "Limited Football Trainer" is not necessarily trained for specific medical situations or acute injuries that occur during athletic events.	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-15 22:17:04	Anonymous	(5.1) Also in our skillset is the ability to identify and manage emergency situations--cardiovascular events, anaphylactic events, heat illnesses, and concussion management to name of few of the important ones that have been involved in the headlines in West Virginia high school sports far too often.  How much is a childs life worth?	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-16 13:25:47	Zach Garrett Graduate Athletic Training Program Director Marshall University Huntington WV	5.2-needs just needs eliminated. 5.3-needs eliminated. This is crazy and contradicts the WVSSAC and BOE policy that coaches cannot be the athletic trainer/limited football trainer. You are also enabling for the potential of another Mingo County or Roane County incident to occur. Just having someone there that can do CPR is NOT ENOUGH!	N	Comment does not reflect any proposed changes to Policy 5112.

**§126118-6. Governing Principles.**

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11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC Athletic Training Program, Director Concord University	6.1: Remove LFT	N	Comment does not reflect any proposed changes to Policy 5112.
11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC Athletic Training Program, Director Concord University	6.2: Remove the word "football" & replace it with "athletic" to ensure all student-athletes not just a select few.	N	Comment does not reflect any proposed changes to Policy 5112.
11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC Athletic Training Program, Director Concord University	6.3: Remove LFT	N	Comment does not reflect any proposed changes to Policy 5112.
2019-11-28 10:53:38	Nicholas Dailey Treasurer West Virginia Athletic Training Association Lewisburg WV	6.1 & 6.2 How is this to be enforced? Is there a system in place to make sure that this is being done?? How would one know if and when this is being violated and if so, what would the penalty be?  6.3 - again, I question the validity of some of the professionals listed to make a judgement call if a child should continue play in a few different scenarios! Its my stance that an ATC should be mandatory and made available for all sports, not just football! It is possible through partnerships, contracts, and sponsorship of local and neighboring healthcare communities to assist the school system to unburdening the overall cost to the schools	N	Comment does not reflect any proposed changes to Policy 5112, nor provide any suggestion for oversight.

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		systems and counties! This is a necessity for every athlete!		
2019-12-02 19:24:33	Jenni Johnson President West Virginia Athletic Trainers' Association Nitro WV	This says no more than 3 days... what is the consequence and who is responsible for enforcing this?	N	Comment reflects a general question/statement but no recommendation to alter the policy for the proposed change in Policy 5112.
2019-12-03 15:01:13	Crissy Mace WV	You have the opportunity to make sports so much safer for ALL West Virginia athletes. Only requiring an athletic trainer for football is not the way to do this, and it is discriminatory against all female athletes in the state, and any male athlete who does not participate in football.	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-08 13:32:49	Pam Schield Athletic Trainer Salem University Salem WV	Policy statement 6.2.b uses the language health related training as described in section 5.3. Yet, the language in section 5.3 uses temporary athletic trainer. Again, it is imperative the separation of these words dictate the professional responsibilities of the athletic trainer and its unique contribution to health care. Temporary athletic trainers are not EMTs, or physician assistants. Language dictating health care needs would better suffice the individual professional responsibilities.	N	Comment does not reflect any proposed changes to Policy 5112.
2019-12-06 U.S. Mail	Kari Williams Athletic Trainer/Teacher Hampshire High School	Again not sure, how we can be in attendance at both Varsity football px and a JC or Freshman game a the same time. (6.2)	N	Comment does not reflect any proposed changes to Policy 5112 and would require a change in WVSSAC policy as well as local district/school policy and procedures on staffing.
2019-12-16 08:28:14	Tom Belmaggio Coordinator of Sports Medicine Marshall Sports	Who is governing these rules? My current job I oversee 14 athletic trainers through the Marshall Sports Medicine Institute, we provide athletic trainers to Cabell, Wayne and Lincoln Counties. In my role it has become apparent that there might	N	Comment is a statement and does not reflect any proposed changes to Policy 5112.

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	Medicine Institute Huntington WV	be limited football trainers holding coaching roles or duties. I believe this should be examined more closely.		
2019-12-16 13:25:47	Zach Garrett Graduate Athletic Training Program Director Marshall University Huntington WV	6.1-See comments similar to section 5. Word on the street is Roane Co. limited football trainer was a coach as well. This is a huge liability!!! 6.2a and 6.2b-This is never enforced! If you had the guts to actually shut down a football game or practice and hold schools accountable this in theory would work, but you have not and will not. There needs to be somebody enforcing these rules and holding the schools accountable for when they e not. The WVSSAC is not and will not do it, so something else needs to be done.	N	Comment does not reflect any proposed changes to Policy 5112.
<b>§126118-7. Reporting of Misconduct.</b>				
11/15/2019 12:10 PM	Brittany Domingo, ATC Athletic Trainer- Princeton Senior High School	7.1- Two different types of consequences occur between the AT & limited football trainer. Limited football trainers just lose their certificate while ATs are held to a higher standard through the WV Board of Physical Therapy, BOC, and other licensing entities.	N	Comment does not support the proposed change to Policy 5112.
11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC Athletic Training Program, Director Concord University	7.1: This creates a double standard for consequences where the AT would be help to a higher degree of accountability with added consequences than an LFT, which in itself insinuates the acknowledgment of the LFTs lack of ability and preparedness to take on this responsibility.	N	Comment does not support the proposed changes to Policy 5112.
2019-11-28 10:53:38	Nicholas Dailey Treasurer West Virginia Athletic Training Association Lewisburg WV	Currently there is no reporting mechanism for ATC or limited football trainers to the WVBOPT as discovered and subsequently reviewed by legislation during the 2019 regular session. There	N	Comment does not support the proposed changes to Policy 5112.

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		have been no ATC incidents in the last 5+ years because there is no way of reporting incident.		
2019-12-02 19:24:33	Jenni Johnson President West Virginia Athletic Trainers' Association Nitro WV	This is inaccurate. The "limited football trainer" is not going to be licensed through the Board of Physical Therapy so who will reports of misconduct be filed to for those individuals.	N	Comment did not correctly read the statement of the change as the reporting of the Board of Physical Therapy is only for the registered Athletic Trainers and the Limited Football Trainers will be reported to the corresponding agency to their licensure in addition to the WVDE.
2019-12-03 15:05:10	Brent Roark Assistant Athletic Trainer Wheeling University Wheeling WV	Athletic Trainers should be under the supervision of the Athletic Director (who should have some experience of working with Athletic Trainers or knowing their roles). Any misconduct from either the Athletic Trainer or coaches, will be under the same supervision of the Athletic Director.	N	Comment does not reflect the proposed change to Policy 5112. The change is to require reporting of any misconduct through the chain of command at the local to the state level.
2019-12-16 13:25:47	Zach Garrett Graduate Athletic Training Program Director Marshall University Huntington WV	7.1-So what happens to the limited football trainers if they e reported? The WVBPT can only enforce rules on licensed athletic trainers and this allows for limited football trainers to practice outside or beyond their scope with little to no repercussion. How are you going to fix this? Its well known there are several limited football trainers making return to play calls on head injuries and they e not qualified to do so.	N	Comment only asks questions and does not provide an alternate solution to the change requested in Policy 5112.
<b>§126118-8. Severability.</b>				
<b>General Comments</b>				
11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC Athletic Training Program, Director Concord University	Mr. Fittro,  I have been certified as an athletic trainer (AT) for over 20 years. I worked in the high school setting for 13 years. Given my professional history I feel am an expert on such topics related to Policy 5112:	N	Comment does not reflect and proposed changes to Policy 5112.

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		<p>Athletic Trainers in the Public Schools of West Virginia. Please see the attachment for detailed remarks and my concerns with portions of this policy. I would like to reinforce 2 major concerns:</p> <p>1) No other health profession in the state of West Virginia (or the entire country) permits other professionals with other credentials to perform job related skills outside of their scope or infringe upon another professions qualifications and training. This policy enables that practice by authorizing the limited football trainer (LFT) who does not have the appropriate training or education to do just that. This policy contradicts the intention of the recently passed licensure for ATs in WV which is intended to protect both professional ATs and the patient populations they serve.</p> <p>2) Choosing to only require medical coverage (or limited medical coverage) for one sport when there is an increased likelihood of debilitating or catastrophic injury as the result of participation in any sport is negligent toward those not offered services. Every year across the country high school student-athletes die and/or are severely disabled as the direct result of their participation in high school athletic programs not related to participation in football. I encourage you to research how many of these occurred in WV in the past several years and in particular how many could have likely been prevented if appropriately trained medical personnel, namely ATs, at been on site and able to intervene on their behalf. The other concern is that only offering such coverage</p>		

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		<p>for a male sport completely ignore female participants. This should be a significant Title IX concern for the state.</p> <p>Thank you for your time and your genuine consideration of these issues and those I commented on in the attachment!</p> <p>John</p> <p>John C. Roberts, Jr., MEd, ATC Athletic Training Program, Director 1000 Vermillion St., Campus Box 77 Concord University Athens, WV 24712 jcroberts@concord.edu (304) 384-6346 Fax (304) 384-5117</p> <p>IMPORTANT: This email is confidential, intended for the named recipient(s) and may contain information that is privileged or exempt from disclosure under applicable law. If you are not the intended recipient, you are notified that the dissemination, distribution, or copying of this message is strictly prohibited.</p> <p>If you receive this message in error, or are not the named recipient, please notify the sender at the email address above and delete this email from your computer. Thank you.</p>		

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11/18/2019 10:35 AM	John C. Roberts, Jr., EdD, ATC Athletic Training Program, Director Concord University	<p>The simple fact this law exists acknowledges the awareness of the state that there is a need for appropriate medical coverage of high school athletics. No other health care profession in the state would allow another profession to enter its workforce and perform it's related skills, yet this law as it is proposed enables others to do just that to athletic trainers (ATs). It is fool-hearty and irresponsible to permit or encourage such actions. It is also ridiculous to think football is the only sport subject to injuries severe enough to warrant appropriate medical coverage. The majority of ACL injuries occur in females, females are more prone to concussions, wrestler's are just as prone to severe and catastrophic injury and in fact have a higher occurrence rate per capita, throwing cheerleaders 10-15 feet in the air subjects them to disabling injury, basketball players suffer the most preventable sudden death events every year. These are factual statements that apply directly WV student-athletes in high school yet the state refuses to take appropriate actions by allowing untrained personnel to act in setting outside their scope and ignoring the vast majority of student-athletes and going against Title IX and ignoring all female participants. Title IX only protects football in relation to the number of opportunities for student-athletes of both gender, not from appropriate access to health care. This law should be be amended to remove all references to limited football trainers (no other state in the country uses this term and it is not a</p>	N	Comment does not reflect and proposed changes to Policy 5112.

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		<p>real thing) and to require ATs be employed at all high school sponsoring athletic. If a school cannot afford an AT, it cannot afford an athletic program. ATs protect student-athletes just as helmets do, but a football game would not be played without helmets. It is foolish and naive to think this issues is any different. Middle school student- athletes should not be ignored either. They should at least have access to the high school athletic trainer. Please consider what is best for the health and well-being of all student-athletes in West Virginia. Do not use an insufficient substitute for the best standard of care for those who are the future of the state. Do not single out WV as the only state to provide such minimal and inappropriate medical coverage for high school student-athletes.</p>		
<p>12/16/19 U.S. Mail</p>	<p>Don Dellinger Deputy Superintendent Berkeley County Schools</p>	<p>Funding should be provided so that schools can employ athletic trainers for all sports.</p>	<p>N</p>	<p>Comment would result in a change to funding mandates and a change in the fiscal note.</p>