

Practice Analysis of ABC Certified Mastectomy Fitters



**American Board for Certification
in Orthotics, Prosthetics, and Pedorthics**

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Acknowledgements

On behalf of the American Board for Certification in Orthotics, Prosthetics & Pedorthics, Inc. (ABC), I am pleased to present this Practice Analysis of ABC Credentialed Mastectomy Fitters. This report describes the contemporary practice of ABC credentialed mastectomy fitters practicing in the United States. It represents the culmination of months of planning, execution, data analyses, and writing.

A project of this scale depends on the hard work and commitment of many professionals, and I am pleased to acknowledge their contributions to the final product. We are indebted to the Practice Analysis Task Force for the direction it provided. Its members – Leigh Anne Ball, CFm, Teresa Caruso, CFm, Allyson Daugherty, PT, CLT, CFm, Natalie Erwin, CFm, Teresa Kelly, CFm, Kimberly Kincaid, CFm, Lisa Malespin, CFo, CFm, Kim Neel, CFm, Judith Amber Simmons, C.Ped., CFo, CFm and Lesleigh Sisson, CFo, CFm – worked with us diligently throughout the study process.

This project represents a substantial investment of ABC’s financial resources and personnel and supports ABC’s efforts in continuing to develop exemplary examination programs as well as providing information to primary and continuing education programs. I am grateful to Cathy Carter, Executive Director and Stephen B. Fletcher, CPO, Director of Clinical Resources for their support and guidance during this project as well as Lauren Moran, Program Coordinator who provided excellent support throughout the project.

Larry D. Word, CPO, FAAOP
President

Executive Summary

The American Board for Certification in Orthotics, Prosthetics, and Pedorthics (ABC) is an organization with the mission “to establish and advocate for the highest patient care and organizational standards in the provision of safe and effective orthotic, prosthetic and pedorthic services.” The ABC Certified Mastectomy Fitter (CFm) credential focuses on breast prostheses and post-mastectomy items and services. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up and practice management.

A practice analysis is designed to obtain descriptive information about the tasks performed on a job and the knowledge needed to adequately perform those tasks. The purpose of the practice analysis was to:

- develop the content outline for the ABC Certified Mastectomy Fitter (CFm) credential.
- develop tasks and knowledge related to the work performed by CFm professionals; and,

Conduct of the Practice Analysis

The practice analysis consisted of several activities: background research; a panel expert review; and development of the content outline for the ABC Certified Mastectomy Fitter (CFm) credential. The successful outcome of the practice analysis depended on the excellent information provided by the CFm professionals who participated in the study.

Background Research

The development of new task and knowledge statements commenced with a review of the existing task and knowledge statements. Additional information was gathered from reference materials and the opinions of the experts participating in the Task Force.

Panel Review/Content Outline Development

An expert panel convened on July 13, 2019 in Alexandria, Virginia. The panel of experts was presented with an overview of the ABC CFm credential and the purpose of conducting a practice analysis. The panel reviewed the draft task and knowledge statements and made additional changes based on consensus regarding the final list of task and knowledge statements.

The expert panel used the final version of the approved list of task and knowledge statements to create the content outline that will guide the development of the ABC Certified Mastectomy Fitter (CFm) credential.

Summary

In summary, this study used a sound approach to identify the tasks and knowledge that are important to the competent performance of CFm professionals. The practice analysis process allowed for input from a representative group of professionals who currently practice mastectomy fitting and was conducted within the guidelines of professionally sound practice.

The results of the practice analysis can be used by the American Board for Certification to develop the Certified Mastectomy Fitter (CFm) credential.

INTRODUCTION

The ABC Certified Mastectomy Fitter (CFm) credential focuses on breast prostheses and post-mastectomy items and services. This includes patient assessment, formulation of a treatment plan, implementation of the treatment plan, follow-up and practice management.

The major purpose of the practice analysis was to identify the tasks and knowledge that are important for competent performance of the mastectomy fitter job. The development of a content-valid credentialing program is based on tasks and knowledge identified through the practice analysis process.

This report describes the practice analysis, including the:

- rationale for conducting the practice analysis;
- methods used to define practice-related tasks and knowledge; and,
- creation of the final content outline.

Practice Analysis Study and Adherence to Professional Standards

Practice analysis refers to procedures designed to obtain descriptive information about the tasks performed on a job and/or the knowledge, skills, or abilities necessary to adequately perform those tasks. The specific type of information collected during a practice analysis is determined by the purpose for which the information will be used.

For purposes of developing credentialing programs, a practice analysis should identify important tasks, knowledge, skills, and/or abilities deemed to be important by professionals in the field of mastectomy fitters.

The use of a practice analysis (also known as job analysis, role and function study, or role delineation study) to define the content domain(s) is a critical component in establishing the content validity of the program. Content validity refers to the extent to which the content covered by the program is representative of the tasks and knowledge of a practice (tasks, knowledge, skills, or abilities).

A well-designed practice analysis should include a representative group of subject-matter experts who reflect the diversity within the profession. Diversity refers to regional or job context factors and to subject-matter expert factors such as experience, gender, and race/ethnicity. Demonstration of content validity is accomplished through the judgments of subject-matter experts. The process is enhanced by the inclusion of subject-matter experts who represent the diversity of the relevant areas of expertise.

The Standards for Educational and Psychological Testing (2014) (*The Standards*) is a comprehensive technical guide that provides criteria for the evaluation of tests, testing practices, and the effects of test use. It was developed jointly by the American Psychological

Association (APA), the American Educational Research Association (AERA), and the National Council on Measurement in Education (NCME). The guidelines presented in *The Standards*, by professional consensus, have come to define the necessary components of quality testing. Consequently, a testing program that adheres to *The Standards* is more likely to be judged as valid and defensible than one that does not.

As stated in Standard 11.13,

“The content domain to be covered by a credentialing test should be defined clearly and justified in terms of the importance of the content for credential-worthy performance in an occupation or profession. A rationale and evidence should be provided to support the claim that the knowledge or skills being assessed are required for credential-worthy performance in that occupation and are consistent with the purpose for which the credentialing program was instituted.... Typically, some form of job or practice analysis provides the primary basis for defining the content domain...” (pp 181-182)

The practice analysis for the ABC Certified Mastectomy Fitter (CFm) credential was designed to follow the guidelines presented in *The Standards* and to adhere to accepted professional practice.

Method

The practice analysis for the ABC Certified Mastectomy Fitter (CFm) credential involved a methodical approach that included an expert panel review. A draft list of tasks and knowledge statements was developed based on the current content outline and previous practice analysis. The draft task and knowledge statements were reviewed by a panel of experts, selected by ABC to serve as the Practice Analysis Task Force Committee. The purpose of the expert panel review was to obtain verification (or refutation) that the tasks and knowledge identified are important to the work of certified mastectomy fitter professionals.

Utilizing multiple experts to review and create the task and knowledge statements functions as a check and balance on the judgments of the initial background research and reduces the likelihood that unimportant areas will be considered in the development of the test specifications. The use of multiple experts eliminates the chance that one expert's input will influence the entire content outline.

The methodology used to conduct the practice analysis is described in detail below and included the following steps:

1. Development of the Domains and Task and Knowledge Statements

A pre-meeting document was sent to the Task Force containing information about the practice analysis and the best practices for developing domains and task and knowledge statements. The pre-meeting document was reviewed by the Task Force prior to the in-person meeting.

2. Expert Panel Review

ABC and Prometric convened an expert panel July 13, 2019 in Alexandria, Virginia. The Task Force was comprised of the ten (10) experts in the mastectomy fitter profession, all Certified Mastectomy Fitter (CFm) professionals. A complete list of the Task Force participants is provided in Appendix A. Prometric staff led the Task Force through the review, revision, and development of domains and task and knowledge statements.

The following domains were covered in the list of the task and knowledge statements:

- 01 Patient Assessment
- 02 Formulation of Treatment Plan
- 03 Implementation of Treatment Plan
- 04 Follow-Up
- 05 Practice Management

3. Development of the Test Specifications

The test specifications were developed as part of the Practice Analysis meeting on July 13, 2019, following the conclusion of discussions about the important task and knowledge statements. Detailed edits to the previous test specifications were completed. The new test specifications are presented in Appendix B. The development of the test specification included the approval of the final list of task and knowledge statements for each of the content areas and linking the knowledge statements to the task statements.

The linking study is not meant to be an exhaustive listing of related knowledge; instead, it is designed to provide evidence that the important knowledge is related to the important tasks. The results of the linking study are presented in Appendix C.

Twenty-nine (29) tasks were identified by the Task Force Committee as important to the competent performance of mastectomy fitter professionals. Table 1 lists the tasks by domain.

Table 1: *Domains and Tasks*

Domains/Tasks	
1. Patient Assessment	
1	Review patient’s prescription/referral
2	Obtain relevant patient medical history, including previous use of post-mastectomy items, diagnosis, and activities of daily living (ADL)
3	Discuss patient’s expectations and goals
4	Perform a diagnosis-specific functional clinical examination that includes observation of chest wall and evaluation of range of motion, manual dexterity, skin integrity, and shape/physical characteristics
5	Consult with other healthcare professionals and caregivers about patient’s condition, as needed
6	Refer patient, if appropriate, to other healthcare professionals (e.g., therapist, physician) for intervention beyond mastectomy fitter’s scope of practice
2. Formulation of Treatment Plan	
1	Use the assessment results to formulate a treatment plan, including goals and expected outcomes to increase patient comfort, enhance function, accommodate deformity (e.g., shoulder drop, scoliosis), and improve balance, symmetry, and appearance
2	Consult with licensed healthcare prescriber to obtain supporting documentation and/or modify the original prescription, if necessary
3	Document the patient’s need described in the treatment plan

4	Identify post-mastectomy items to support the treatment plan
5	Communicate to patient and/or caregiver about the recommended treatment plan and timeline for completion
6	Inform patient or responsible parties of their financial responsibilities as they pertain to the recommended treatment plan and/or any coverage limitations
3. Implementation of Treatment Plan	
1	Measure patient and select appropriate post-mastectomy items to implement treatment plan
2	Assess fit and comfort of post-mastectomy items and make any necessary adjustments
3	Ensure that post-mastectomy items are provided as prescribed
4	Educate patient and/or caregiver about the use and care of post-mastectomy items (e.g., wearing schedules, cleaning), including benefits, possible risks, and warranty information
5	Advise the patient and/or caregiver about their rights and responsibilities
6	Document treatment using established record-keeping techniques to verify implementation of treatment plan
7	Develop and communicate follow-up plan
4. Follow-Up	
1	Obtain feedback from patient and/or caregiver about the outcome of the treatment plan (e.g., tolerance, comfort, ability to don and doff, proper usage, and function)
2	Re-evaluate the patient through a follow-up clinical examination that may include review of changes to patient status, shape, and physical characteristics
3	Identify need for changes relative to initial treatment goals and expectations by assessing fit of post-mastectomy items
4	Modify or adjust post-mastectomy items based on assessment and/or patient/caregiver feedback
5	Educate patient and/or caregiver on proper use of post-mastectomy items relative to modifications/adjustments
6	Document follow-up care, including any changes in treatment plan
5. Practice Management	
1	Comply with federal and state regulations for the delivery of items within the Certified Mastectomy Fitter Scope of Practice (e.g., CMS, Medicaid, OSHA, HIPAA)
2	Comply with policies and procedures regarding universal precautions and infection control
3	Comply with documentation requirements (e.g., document retention, verification that post-mastectomy items were delivered and billed as prescribed)

Thirty-three (33) knowledge and skills statements were identified by the Task Force Committee as important for CFm professionals to know. Table 2 lists the knowledge and skills statements.

Table 2: *Knowledge and Skills Statements*

Mastectomy Fitter Knowledge and Skills	
Knowledge of:	
	Musculoskeletal anatomy, including upper limb and spinal
	Anatomical landmarks
	Tissue characteristics/management
	Post-surgical edema
	Range of motion
	Medical terminology
	Breast treatment options
	Lymphatic system
	Prescription/referral documents
	Documentation and document retention requirements
	Policies and procedures regarding Protected Health Information (PHI)
	Roles and responsibilities associated with other healthcare professions
	Reimbursement coverage criteria (e.g., CMS/third party payers)
	Material safety procedures and standards (e.g., OSHA, SDS)
	Universal precautions and infection control
	Ethical standards regarding proper patient management
	Scope of practice related to mastectomy fitter credential
	When to refer the patient to other healthcare providers/caregivers
	Post-mastectomy items
	Post-mastectomy item fitting criteria
	Examination techniques
	Measurement tools and techniques
	Care and maintenance of post-mastectomy items
	Item warranties
	Inventory control and management
	Federal and state rules, regulations, and guidelines (e.g., CMS, ADA, state licensure)
Skill in:	
	Performing clinical examinations and interviewing patients
	Interpretation of physical findings
	Developing or modifying a treatment plan
	Adapting treatment plan relative to the patient’s functional needs (e.g., patients with stroke, cognitive impairment)
	Measuring and fitting post-mastectomy items
	Evaluating fit and function of post-mastectomy items
	Documentation

Eleven (11) mastectomy items were identified by the Task Force Committee as important to the competent performance of CFm professionals. Table 3 lists the approved mastectomy items.

Table 3: *Mastectomy Items*

Mastectomy Item List	
	Breast prosthesis, mastectomy bra
	Breast prosthesis, mastectomy bra, with integrated breast prosthesis form, unilateral
	Breast prosthesis, mastectomy bra, with integrated breast prosthesis form, bilateral
	External breast prosthesis garment, with mastectomy form, post-surgical
	Breast prosthesis, non-silicone
	Breast prosthesis, silicone
	Nipple prosthesis
	Custom-fabricated breast prosthesis
	Breast prosthesis, silicone, with integral adhesive
	Adhesive skin support attachment for use with external breast prosthesis
	Compression garments

The expert panel’s next activity was to provide content weights for each of the domains. This was accomplished by having each of the participants give their individual estimates, entering those estimates into a spreadsheet, and discussing the aggregated data. Table 4 below shows each domain, the percentage weights assigned, and the total number of items as finalized by the Test Specifications Committee.

Table 4: *Weighting Exercise*

Domains		Percentage Weight	Number of Items
1	Patient Assessment	29%	32
2	Formulation of Treatment Plan	15%	16
3	Implementation of Treatment Plan	32%	35
4	Follow-Up	8%	9
5	Practice Management	16%	18

SUMMARY AND CONCLUSION

The practice analysis for the American Board for Certification in Orthotics, Prosthetics, and Pedorthics (ABC) was conducted to:

- identify tasks and knowledge important to the work performed by Certified Mastectomy Fitter (CFm) professionals; and,
- create a content outline that may be used to develop the Certified Mastectomy Fitter (CFm) exam

The task and knowledge statements were developed through an iterative process involving the combined efforts of ABC, its volunteers, and Prometric staff. The tasks and knowledge statements were verified as important through the review of experts and provide the foundation for development for the ABC Certified Mastectomy Fitter credential. In summary, the practice analysis utilized a multi-method approach to identify the tasks and knowledge important to the work performed by Mastectomy Fitter professionals.

APPENDIX A: PRACTICE ANALYSIS/TEST SPECIFICATIONS COMMITTEE

Name	Credentials/Expertise	State
Ball, Leigh Anne	CFm/Office Manager	KY
Caruso, Teresa	CFm, /Business Management	SC
Daugherty, Allyson	PT, CLT, CFm/Physical Therapy	NC
Erwin, Natalie	CFm/Health Care Administration	NC
Kelly, Teresa	CFm/Office Administration	VA
Kincaid, Kimberly	CFm/Mastectomy Coordinator	FL
Malespin, Lisa	CFo, CFm/Patient Care	ID
Simmons, Judith Amber	CPed, CFo, CFm/Business Finance	LA
Sisson, Lesleigh	CFo, CFm/Business Administration	NV
Zeise Neel, Kim	CFm, Bd of Pharmacy/Business Administration	SC

APPENDIX B: NEW TEST SPECIFICATIONS

2019 Mastectomy Fitter Domain Test Specifications

TASK STATEMENTS

1. Patient Assessment 29%	
1	Review patient’s prescription/referral
2	Obtain relevant patient medical history, including previous use of post-mastectomy items, diagnosis, and activities of daily living (ADL)
3	Discuss patient’s expectations and goals
4	Perform a diagnosis-specific functional clinical examination that includes observation of chest wall and evaluation of range of motion, manual dexterity, skin integrity, and shape/physical characteristics
5	Consult with other healthcare professionals and caregivers about patient’s condition, as needed
6	Refer patient, if appropriate, to other healthcare professionals (e.g., therapist, physician) for intervention beyond mastectomy fitter’s scope of practice

2. Formulation of Treatment Plan 15%	
1	Use the assessment results to formulate a treatment plan, including goals and expected outcomes to increase patient comfort, enhance function, accommodate deformity (e.g., shoulder drop, scoliosis), and improve balance, symmetry, and appearance
2	Consult with licensed healthcare prescriber to obtain supporting documentation and/or modify the original prescription, if necessary
3	Document the patient’s need described in the treatment plan
4	Identify post-mastectomy items to support the treatment plan
5	Communicate to patient and/or caregiver about the recommended treatment plan and timeline for completion
6	Inform patient or responsible parties of their financial responsibilities as they pertain to the recommended treatment plan and/or any coverage limitations

3. Implementation of Treatment Plan 32%	
1	Measure patient and select appropriate post-mastectomy items to implement treatment plan
2	Assess fit and comfort of post-mastectomy items and make any necessary adjustments
3	Ensure that post-mastectomy items are provided as prescribed
4	Educate patient and/or caregiver about the use and care of post-mastectomy items (e.g., wearing schedules, cleaning), including benefits, possible risks, and warranty information
5	Advise the patient and/or caregiver about their rights and responsibilities
6	Document treatment using established record-keeping techniques to verify implementation of treatment plan
7	Develop and communicate follow-up plan

4. Follow-Up 8%	
1	Obtain feedback from patient and/or caregiver about the outcome of the treatment plan (e.g., tolerance, comfort, ability to don and doff, proper usage, and function)
2	Re-evaluate the patient through a follow-up clinical examination that may include review of changes to patient status, shape, and physical characteristics

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3	Identify need for changes relative to initial treatment goals and expectations by assessing fit of post-mastectomy items
4	Modify or adjust post-mastectomy items based on assessment and/or patient/caregiver feedback
5	Educate patient and/or caregiver on proper use of post-mastectomy items relative to modifications/adjustments
6	Document follow-up care, including any changes in treatment plan

5. Practice Management 16%	
1	Comply with federal and state regulations for the delivery of items within the Certified Mastectomy Fitter Scope of Practice (e.g., CMS, Medicaid, OSHA, HIPAA)
2	Comply with policies and procedures regarding universal precautions and infection control
3	Comply with documentation requirements (e.g., document retention, verification that post-mastectomy items were delivered and billed as prescribed)

KNOWLEDGE AND SKILLS

Knowledge of:	
1	Musculoskeletal anatomy, including upper limb and spinal
2	Anatomical landmarks
3	Tissue characteristics/management
4	Post-surgical edema
5	Range of motion
6	Medical terminology
7	Breast treatment options
8	Lymphatic system
9	Prescription/referral documents
10	Documentation and document retention requirements
11	Policies and procedures regarding Protected Health Information (PHI)
12	Roles and responsibilities associated with other healthcare professions
13	Reimbursement coverage criteria (e.g., CMS/third party payers)
14	Material safety procedures and standards (e.g., OSHA, SDS)
15	Universal precautions and infection control
16	Ethical standards regarding proper patient management
17	Scope of practice related to mastectomy fitter credential
18	When to refer the patient to other healthcare providers/caregivers
19	Post-mastectomy items
20	Post-mastectomy item fitting criteria
21	Examination techniques
22	Measurement tools and techniques
23	Care and maintenance of post-mastectomy items
24	Item warranties
25	Inventory control and management
26	Federal and state rules, regulations, and guidelines (e.g., CMS, ADA, state licensure)
Skill in:	
27	Performing clinical examinations and interviewing patients
28	Interpretation of physical findings
29	Developing or modifying a treatment plan

30	Adapting treatment plan relative to the patient's functional needs (e.g., patients with stroke, cognitive impairment)
31	Measuring and fitting post-mastectomy items
32	Evaluating fit and function of post-mastectomy items
33	Documentation

Mastectomy Item List	
1	Breast prosthesis, mastectomy bra
2	Breast prosthesis, mastectomy bra, with integrated breast prosthesis form, unilateral
3	Breast prosthesis, mastectomy bra, with integrated breast prosthesis form, bilateral
4	External breast prosthesis garment, with mastectomy form, post-surgical
5	Breast prosthesis, non-silicone
6	Breast prosthesis, silicone
7	Nipple prosthesis
8	Custom-fabricated breast prosthesis
9	Breast prosthesis, silicone, with integral adhesive
10	Adhesive skin support attachment for use with external breast prosthesis
11	Compression garments

Appendix C: Linking Study

Tasks		Knowledge and Skills					
1. Patient Assessment		K/S 1	K/S 2	K/S 3	K/S 4	K/S 5	K/S 6
1	Review patient’s prescription/referral	k11	k7	k1	k9	k23	
2	Obtain relevant patient medical history, including previous use of post-mastectomy items, diagnosis, and activities of daily living (ADL)	k12	s33	s39			
3	Discuss patient’s expectations and goals	s33	s35	s36			
4	Perform a diagnosis-specific functional clinical examination that includes observation of chest wall and evaluation of range of motion, manual dexterity, skin integrity, and shape/physical characteristics	k2	k3	k4	k5	s33	s34
5	Consult with other healthcare professionals and caregivers about patient’s condition, as needed	k11	k20	k19			
6	Refer patient, if appropriate, to other healthcare professionals (e.g., therapist, physician) for intervention beyond mastectomy fitter’s scope of practice	k20	k14	k19			
2. Formulation of Treatment Plan		K/S 1	K/S 2	K/S 3	K/S 4	K/S 5	K/S 6
1	Use the assessment results to formulate a treatment plan, including goals and expected outcomes to increase patient comfort, enhance function, accommodate deformity (e.g., shoulder drop, scoliosis), and improve balance, symmetry, and appearance	s34	k8	s35	s36		
2	Consult with licensed healthcare prescriber to obtain supporting documentation and/or modify the original prescription, if necessary	k12	k14	k11	k32		
3	Document the patient’s need described in the treatment plan	k12	k32	s39	s36		
4	Identify post-mastectomy items to support the treatment plan	s37	k21	k22			
5	Communicate to patient and/or caregiver about the recommended treatment plan and timeline for completion	s38	k32	s33			
6	Inform patient or responsible parties of their financial responsibilities as they	k15	k32				

Tasks		Knowledge and Skills					
	pertain to the recommended treatment plan and/or any coverage limitations						
3. Implementation of Treatment Plan		K/S 1	K/S 2	K/S 3	K/S 4	K/S 5	K/S 6
1	Select and prepare appropriate post-mastectomy items to implement treatment plan	k21	s37	k28			
2	Assess fit and comfort of post-mastectomy items and make any necessary adjustments	k24	k22	s38	s36		
3	Ensure that post-mastectomy items are provided as prescribed	k32	s39	k12			
4	Educate patient and/or caregiver about the use and care of post-mastectomy items (e.g., wearing schedules, cleaning), including benefits, possible risks, and warranty information	k25	k26	k28			
5	Advise the patient and/or caregiver about their rights and responsibilities	k32	k18	k13			
6	Document treatment using established record-keeping techniques to verify implementation of treatment plan	s39	k12	k32			
7	Develop and communicate follow-up plan	s36	s37				
4. Follow-Up		K/S 1	K/S 2	K/S 3	K/S 4	K/S 5	K/S 6
1	Obtain feedback from patient and/or caregiver about the outcome of the treatment plan (e.g., tolerance, comfort, ability to don and doff, proper usage, and function)	s33	s34				
2	Re-evaluate the patient through a follow-up clinical examination that may include review of changes to patient status, shape, and physical characteristics	s33	s34	s36			
3	Identify need for changes relative to initial treatment goals and expectations by assessing fit of post-mastectomy items	s38	k22				
4	Modify or adjust post-mastectomy items based on assessment and/or patient/caregiver feedback	k22	s38				
5	Educate patient and/or caregiver on proper use of post-mastectomy items relative to modifications/adjustments	k21	k25	s36			
6	Document follow-up care, including any changes in treatment plan	k12	s39				

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Tasks		Knowledge and Skills					
5. Practice Management		K/S 1	K/S 2	K/S 3	K/S 4	K/S 5	K/S 6
1	Comply with federal and state regulations for the delivery of items within the Certified Mastectomy Fitter Scope of Practice (e.g., CMS, Medicaid, OSHA, HIPAA)	k32	s39	k16	k15		
2	Comply with policies and procedures regarding universal precautions and infection control	k32	k17				
3	Comply with documentation requirements (e.g., document retention, verification that post-mastectomy items were delivered and billed as prescribed)	k12	s39	k32			