



**From:** [Education](#)  
**To:** [ST, RegulatoryCounsel](#)  
**Cc:** [Education](#); [Maria Buscemi](#)  
**Subject:** [External] Regulation No. 16A-4335 (Fees)  
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**Attachments:** [image001.png](#)  
[ACA-Comments-PA-Regulation-No.-16A-4335-Fees.pdf](#)

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Hello –

Thank you for the opportunity to comment on the following proposed rule: Regulation No. 16A-4335 (Fees). ACA's comments are attached. If you have questions, please do not hesitate to reach out.

Kindest regards,  
Maria



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September 4, 2023

Attention: Pennsylvania State Board of Chiropractic and Bureau of Professional and Occupational Affairs

RE: Regulation No. 16A-4335 (Fees)

The American Chiropractic Association (ACA) has reviewed the "Proposed Rulemaking" regarding continuing education credit approval fees and has herein prepared public comments. ACA respectfully opposes the proposed graduated increases continuing education approval fees, outlined below:

- FY 2024-2025 through FY 2025-2026: The fee increase from \$30 to \$100.
- FY 2026-2027 through FY 2027-2028: The fee increase from \$100 to \$110.
- FY 2028-2029 through FY 2029-2030: The fee increase from \$110 to \$120.

The proposed fee increases make delivery of affordable, quality, and approved continuing education credits to licensed Doctors of Chiropractic in Pennsylvania a cost-prohibitive undertaking without enhancing the standards of quality for continuing education (CE) providers in the chiropractic space or the educational value received by the licensees taking courses to satisfy licensure renewal requirements and improve their clinical practice. Based on the background presented in the proposed rulemaking, it is observed that the Board's intent with these changes is to close the gap between the Board's annually budgeted expenses and revenue. The ACA respectfully requests that the Board reconsider how this budgetary gap is addressed.

**ACA also proposes that the State Board of Chiropractic consider the successful models delivered by several other state licensing boards in the United States such as [Colorado](#), [Delaware](#), and [Illinois](#), where the rules, regulations, or administrative codes of each state promulgate the standards of acceptable, board-approved continuing education courses or credits, the subject areas that should be covered, and the responsibility of the licensee to select courses that align with these standards.**

**Several states or jurisdictions in the United States, including Delaware and Illinois, take one step further in defining the CE providers who are pre-approved as accredited Chiropractic colleges or state and national organizations.** Following this model has the potential to minimize the number of applications that must be processed by the State Board, in turn decreasing both the direct expenses related to this function and the indirect costs associated with staff time.

**For example, in [Delaware](#), the [rules and regulations](#) state that "only courses co-sponsored by accredited Chiropractic colleges, national or state organizations are presumptively approved so long as the course relates to the field of Chiropractic. Excepted from this presumptive approval**



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are courses in practice management subjects.” Another example includes [Illinois’ Administrative Code](#) pertaining to Continuing Medical Education which defines the approved “sponsor(s) of Continuing Medical Education (CME)” for Chiropractic, including the Illinois Chiropractic Society, or its affiliates; the Illinois Prairie State Chiropractic Association, or its affiliates; the International Chiropractic Association, or its affiliates; and the *American Chiropractic Association, or its affiliates...*” Other organizations sponsoring continuing medical education, such as for-profit companies, must obtain and maintain approved Sponsor status with Illinois’ Board by applying and paying a non-refundable fee annually, which covers all courses offered.

Colorado, Delaware, and Illinois serve as examples of licensing boards that have significantly streamlined their processes, cut down on the number of applications that must be processed, and optimized their resources by clearly and specifically delineating rigorous standards for approved continuing education that satisfy jurisdictional licensing requirements and ensure licensed DCs maintain their competency. In addition, these boards maintain their commitment to protecting the health, safety and welfare of the public by establishing rigorous standards to meet mandatory continuing education requirements for licensure renewal that align with industry-accepted standards of quality continuing education for adult learners and by conducting periodic, random audits to verify licensees’ compliance.

As a PACE-approved provider and an approved provider of continuing education through the New York Department of Education and State Board of Chiropractic, ACA follows high standards of quality in the delivery of each of its educational programs. Each course is vetted by relevant, nationally-recognized ACA subject matter experts, as well as the ACA Professional Development Committee, to ensure course alignment with ACA’s standards of continuing education; to verify that speakers are qualified; and to make certain the content is current, accurate, and consistent with evidence-based chiropractic practice. Every course is free of promotional content or marketing material. ACA is committed to delivering value to learners in every educational offering, and in turn, to improving the practice of chiropractic for the benefit of patients.

The mission of ACA is to inspire and empower our members to elevate the health and wellness of their communities. We are leading a modern movement of chiropractic care based on higher standards and a focus on patient outcomes. We value participation in the health care community through collaboration and integration. To that end, we would like to offer our support and collaboration in the development of rules with the State Board of Chiropractic going forward, should the opportunity arise.

Thank you for your time and attention, and for the opportunity to submit these public comments. Please feel free to contact us at [education@acatoday.org](mailto:education@acatoday.org) for further information or support.

Respectfully,



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