



# Chiropractic Fellowship of Pennsylvania

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June 24, 2005

Rebecca L. Bickley, Director  
Bureau of Driver Licensing  
Department of Transportation  
1101 South Front Street  
Harrisburg, PA 17104

RECEIVED  
2005 JUN 28 AM 8:34  
REVENUE COMMISSION

RE: Proposed School Bus Drivers Regulation

Dear Ms. Bickley,

The Chiropractic Fellowship of Pennsylvania is one of two professional associations representing the profession of Chiropractic in Pennsylvania. We have read the above referenced proposed regulation, published in the May 28, 2005, PA Bulletin. We have some strong concerns with this regulation, and we appreciate the opportunity to present those concerns here.

First, we are strongly opposed to the use of the term "Doctor of Chiropractic **Medicine**". The Department must be aware that the proper term for our profession in this Commonwealth, as stated in the Chiropractic Practice Act, is "Doctor of Chiropractic". Chiropractic is, statutorily, and philosophically, a Non-medical profession. The proposed regulation makes reference to the State Board of Chiropractic, and its use of the term "chiropractic specialty". The State Board of Chiropractic has been working for a number of years to develop a regulation on the issue of chiropractic specialties, but so far has not even published this list as a proposed regulation, let alone as final. Furthermore, even if it were published, we doubt it would include "Doctor of Chiropractic Medicine", and we, and I suspect the medical community, would oppose it if it did.

That brings us to the second problem we see with this regulation. If chiropractors are qualified to provide these physicals, they ALL should be permitted to conduct them, not just some severely limited number who have designated themselves a "Doctor of Chiropractic Medicine", which in itself we believe would be in violation of state law. Not only that, but it would present your Department with difficulties determining the qualifications of such a person to provide a valid physical, as the State Board of Chiropractic does not even recognize them.

We recommend simply deleting the word "Medicine" from the title, and allowing any licensed Doctor of Chiropractic who wishes to provide physicals for school bus drives to do so. This would be consistent with the federal examples you cited as precedent in justifying the regulation.

We are available to discuss our position at any time throughout the regulatory process and look forward to your response. Thank you for your consideration of our comments.

Very truly yours,

CHIROPRACTIC FELLOWSHIP OF PENNSYLVANIA

A handwritten signature in cursive script that reads "Gary Horwin, D.C.".

Gary S. Horwin, DC  
President

cc: Rep. Richard Geist, Chair, House Transportation Committee  
Rep. Keith R. McCall, Democratic Chair, House Transportation Committee  
Sen. Roger Madigan, Chair, Senate Transportation Committee  
Sen. J. Barry Stout, Democratic Chair, Senate Transportation Committee  
John McGinley, Chairman, Independent Regulatory Review Commission