

MICHAEL PATRICK McGEEHAN

PROFESSIONAL LICENSURE COMMITTEE  
MAJORITY CHAIRMAN



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**House of Representatives**  
COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

October 21, 2009

Mr. Kim Kaufman  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RE: Proposed Regulation  
State Board of Chiropractic  
16A-4318: Continuing Education Violations

Dear Mr. Kaufman:

The House Professional Licensure Committee on this date voted to take no formal action on Regulation 16A-4318 until final regulation is promulgated and to submit the following comments.

1. The Committee requests an explanation for the jeopardy of a licensee having to certify that he/she has complied with the mandated continuing education requirements on the biennial registration renewal and having the registration issued, when the licensee may have failed to complete the required amount of continuing education during the previous biennial renewal period. Is the licensee sanctioned for falsifying a biennial registration as well as failing to comply with the continuing education requirements?
2. The Committee requests an explanation as to how a licensee makes up a continuing education deficiency after renewing a license but must provide proof of attendance at continuing education courses during the previous biennial registration period.
3. The Committee requests information on how the Board monitors the six (6) month grace period within the new biennial period that the proposed §5.77(d) permits a licensee who

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has renewed his/her registration to make up any deficiency in continuing education and when the Board imposes the civil penalty for the failure to complete the continuing education requirement.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike McGeehan". The signature is written in a cursive style with a large initial "M".

Michael P. McGeehan  
Chairman, House Professional Licensure Committee