

MICHAEL PATRICK McGEEHAN

PROFESSIONAL LICENSURE COMMITTEE  
MAJORITY CHAIRMAN



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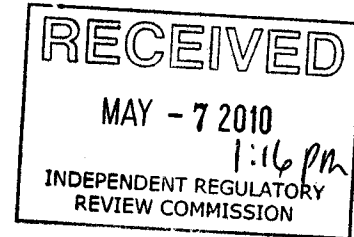
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House of Representatives  
COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

May 5, 2010

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-4315 – Chiropractic Review of Treatment

Dear Mr. Kaufman:

**RECOMMENDATION:** It is recommended the House Professional Licensure Committee take no formal action until final regulations are promulgated and submit the following comments:

1. The Committee questions the purpose/need for Proposed Regulation 16A-4315 and requests an explanation of the harm/lack of efficiency that it seeks to rectify.
2. The Committee recommends that, rather than defining “independent chiropractic examination” in Section 5.55(h) and “chiropractic peer review” in Section 5.56(e) at the end of each section, the definitions be placed in Sections 5.55(a) and 5.56(a) and the remaining provisions be relettered.
3. The Committee requests an explanation for the need to specify that professional liability insurance cover a chiropractor performing independent chiropractic examinations in Section 5.55(a)(3) and chiropractic peer reviews in Section 5.56(a)(4). Wouldn't a professional liability insurance policy already cover the practice of a chiropractor, especially for independent chiropractic examinations even if chiropractic peer review is not covered?

Sincerely,

A handwritten signature in black ink that reads "Michael P. McGeehan".

Michael P. McGeehan  
Chairman, House Professional Licensure Committee