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To: Regulatory Unit Counsel, Department of State
State Board of Chiropractic
PO Box 2649
Harrisburg, PA 17105-2649

From: Guy Annunziata, DC, BCN

Re: Proposed Rulemaking regarding distance learning

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Dear Regulatory Counsel,

I am writing this letter to shed some light on the proposed rule change regarding distance learning. I have been providing live CE lectures throughout the country (including Pennsylvania) since 1992 and I have also provided online CE courses since 2008. As a chiropractic continuing education provider that has taught both live and online CE credits, I have the unique position of being able to objectively analyze the efficacy of each method.

While live courses may initially give the impression that the doctor is learning more simply because he/she is physically at the seminar, the reality is just the opposite. While most of the doctors that attend live courses are interested in the material and are paying attention, a good percentage of them are there just for the hours. Having taught hundreds of courses and having attended hundreds of others, I can tell you from experience that anywhere from 20-25% of the class is there just for the hours. They could not care less about what is being taught and, as a result they are not paying attention – they are just there! Before technology provided us with smart phones and tablets, these doctors would pass the time reading the newspaper or a book. Some of the more resourceful doctors would have their friends sign them in and out while they sat outside at the pool; I've even seen doctors send their employees in their place to seminars.

I know that live seminars have begun to crack down regarding attendance by asking for picture ids and having doctors sign in and out every time they leave the room but the reality is that no matter how hard you try to get them to sit in the room, you can't force them to pay attention – so what are you really accomplishing.

While it may be argued that "hands on classes" must be taught in a live setting, the reality is that there are not many of these hands on classes being offered to the profession. Probably less than 10% of all chiropractic CE courses are considered hands on courses.

Distance learning forces doctors to pay attention to what is being offered on the computer screen because they only receive credit for the courses if they pass the quizzes during the courses and the tests after the courses. If they don't pay attention and actually learn something – then they do not get credit for the course. Unless you make it mandatory for live courses to implement testing in order for the doctor to get credit, online courses will always be more effective in successfully communicating the material.

I hope this perspective sheds some light on this subject. Perhaps, instead of decreasing the number of CE hours that can be obtained through online courses, you should consider only approving those online CE courses that require the doctor satisfactorily pass quizzes throughout the course and a final test at the end of the course. The quizzes will insure that the doctor is actually in front of the computer during the course (the course does not move forward unless the quiz is completed) and the final test insures that the doctor has actually learned the material.

Thank you for your time and please feel free to contact me if you have any questions. My office number is 843-686-9350 and my email is drguy@hargray.com

Warmest Regards,

A handwritten signature in black ink, appearing to read "Guy Annunziata, DC, BCN". The signature is stylized with a large, looped initial "G" and "A".

Guy Annunziata, DC, BCN