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**Kathy Cooper**

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**From:** Dr Joseph V Mullen <drspinealign@gmail.com>  
**Sent:** Tuesday, March 27, 2018 12:49 AM  
**To:** IRRC  
**Subject:** Chiropractic Regulation Change 3197

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To IRRC: Please include the following in the Public Comments

To: Pennsylvania State Board of Chiropractic

I) I was shocked to learn that the regulation change S.31 C (5) Submitted by the State Board of Chiropractic regarding specialties advertising has made it to this point without change in its presented format?

a) This proposed regulation change as it stands would give **COMPLETE CONTROL** of all diplomate Degrees to one organization not previously accredited or involved in Pennsylvania law. This is **IN DIRECT CONFLICT** with existing and historical PA Chiropractic Law which clearly grants **STATUS** to Chiropractic Colleges that are "Approved Colleges" under section 625.303.303 (thru the Accreditation agency know as the Council on Chiropractic Education (CCE) which is recognized by the DOE (Department of Education).

b) The **political organization**, the ACA (American Chiropractic Assoc.) is one of **multiple** organizations that represent a minority share of Chiropractors in the United States when compared to the whole, despite any attempted conflation of their standing as the representative body of Chiropractic professionals. The ACSB (American Chiropractic Specialties Board) is an arm of that political organization. That said it should be further noted that even that political organization (The ACA) has in the past, thru it's by laws, recognized, **Accredited Chiropractic Colleges.**

**"Diplomate programs have always been the purview of the field practitioner; and most chiropractic colleges allow only licensed doctors of chiropractic to attend diplomate programs. Therefore, be it resolved that the ACA commend chiropractic colleges for conducting postdoctoral diplomate courses for licensed field doctors of chiropractic. Be it furthered resolved, that diplomate programs should remain available for doctors of chiropractic."**

**Article VII, Section 7.2 ( C) of the ACA by LAWS.**

c) Approval of this new regulation would completely remove the accredited colleges that **the state board has previously recognized as, "APPROVED COLLEGES"**. There are multiple Diplomate degrees and specialty certifications involved. There is already precedent setting historical law that is uniform and protects the citizens of the state of Pennsylvania with one known, government recognized **accrediting** body across the United States thru **The Department of Education, the CCE**. This is the same body that **accredits** all chiropractic Colleges throughout the country. The **CCE is recognized by the U.S. Department of education**. The ACSB is a

separate body that is independent of the US Department of Education but has relevant programs and a great deal of credible doctors running their programs.

1.) **It was not good enough for Pennsylvania Chiropractic College to do self- studies to obtain diplomate granting status when PA Law 625.303.303 was made and, "The board shall NOT APPROVE ANY chiropractic college, which is NOT ACCREDITED."** The State of Pennsylvania and specifically this board would be BLINDLY absolving its responsibility to the citizens of Pennsylvania by ignoring or diminishing the historical degree granting status of the CCE accredited chiropractic colleges it has recognized for so many years. Those colleges are also accredited by the CCE that is the only recognized accrediting agency of the U.S. Department of Education.

2.) Further regulation of Diplomate and specialty certification STATUS of chiropractic professionals can easily be added by noting that a professional cannot advertise ANY Diplomate or Specialty STATUS unless the program was taken thru an, "Approved College." This would be consistent with the historical legal precedent as well as solidify uniform, accredited and "approved," educational Standards be kept in place for the safety of the citizens of Pennsylvania.

3.) What do you now tell Doctors that have taken programs "Approved" thru the Current Pennsylvania State Board of Chiropractic, continuing education laws at accredited colleges? Are you going to tell them that their Diplomate's and Specialties' are no good that they must obtain a new Diplomate or specialty certification from this new organization? I mean no detriment or comment to the ACSB or their ability to grant Diplomate and specialty certifications but, it makes NO SENSE to disallow those that earned STATUS through accredited colleges to advertise their hard earned Diplomate and specialty certifications.

4.) The State Board would be opening Pandora's Box by allowing this regulation to go thru as it stands by removing the Accredited chiropractic college programs and graduates from having the ability to advertise their diplomats and specialties'. Those Diplomate's and specialty certifications were taken through credible, approved, and accredited colleges. **Make providers who do not have accredited diplomats and specialty certifications STOP stating they have any status beyond their chiropractic, D.C. degree.** That is the responsibility of the board, not to remove accredited status from diplomats and specialty certifications that is the globally recognized means of ensuring education status while protecting the citizens of Pennsylvania.

5.) I have already spoken to Diplomate program educators who hope to resolve this issue through the board but, they are not averse to legal action if they are aggrieved by this unbelievable legislation. This would be extremely COSTLY to the taxpayers of the state of Pennsylvania when this issue can be amicably resolved. I implore you to take the advice of the Pennsylvania State Associations and resolve this matter before this issue becomes larger and litigious. The safety and welfare of the Citizens is always of greatest importance and that can be achieved.

6.) There is no need to redo the UNIFORM chiropractic Legislation that protects the citizens of Pennsylvania. If the board so deems it necessary to contain advertising of these

diplomates by professionals, may I be so bold to suggest that it look to its own prior legislation. Utilize the "Approved College" accreditation STATUS that has been applied to license all doctors of chiropractic, chiropractic colleges, continuing education, as well as the new child abuse educational programs that the state has mandated. **Do NOT allow doctors with NO ACCREDITATION STATUS to advertise unearned diplomats and specialties'**. Enforce the law and make those that make claim to Diplomate and specialty certifications status provide verification that they received that SPECIALITY thru an "Approved College." It's that simple.

7.) I want to shed light and a Common Sense approach to this discussion that appears to be clouded. Approved and accredited colleges should not have their legitimate status revoked to grand Diplomate degrees and specialty certifications. You would NEVER hear of this happening to Penn State or other colleges at the state board levels. Professionals go to "APPROVED COLLEGES" to obtain these degrees. The reinvention of the wheel is not necessary with regard to established professional standards and safety of the CITIZENS of Pennsylvania.

II) There is no need to redo the UNIFORM Legislation and **academic Accreditation Standards that PROTECT the citizens of Pennsylvania thru a uniform educational standard code.** There may be reason to secure existing laws as previously mentioned. If so secure the Law that exists and, insure that doctors of chiropractic that claim Diplomats' and Specialty Certifications have earned them thru "APPROVED CHIROPRACTIC COLLEGES." This regulation change as it has been presented will complicate laws that can easily be secured, increase the risk of poor oversight of the diplomats and specialty certifications as well as create possible litigation that would be costly to the citizens of Pennsylvania. I again **IMPLORE** you to resolve this amicably and include Diplomate and specialty certifications taken thru "APPROVED CHIROPRACTIC COLLEGES."

Sincerely,  
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