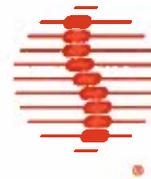


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April 3, 2018

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ICA  
International  
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The Honorable George D. Bedwick, Chairman  
Independent Regulatory Review Commission  
14<sup>th</sup> Floor, Harristown 2  
333 Market Street  
Harrisburg, PA 17101

RE: State Board of Chiropractic – Proposed Regulation Change –  
Chiropractic Specialties, 49 Pa. Code, Chapter 5 (16A-4312)

Dear Chairman Bedwick:

The International Chiropractors Association (ICA) would like to respond, on behalf of its members in Pennsylvania and affiliated chiropractic colleges, to the proposed regulation change to Chiropractic Specialties, 49 Pa. Code, Chapter 5 (16A-4312). ICA does not support the proposed rule and, in fact, strongly objects to the arbitrary and unwarranted exclusion of one of the world leaders in granting advanced diplomas and certifications within the chiropractic profession, the ICA. Graduates of these gold standard postgraduate programs, of more than 300 hours of demanding instruction with rigorous objective testing, serve at the highest ethical and clinical level, with specialized training which helps improve the health of Pennsylvania's citizens who utilize their services.

The ICA understands that the proposed regulation attempts to reduce advertising fraud and abuse. The proposed regulation now before the IRRC, however, excludes many advanced certificate holders and diplomates of programs conducted at least at the level of that single organization named in the proposed rule, or higher, on no substantive or logical basis.

Also, ICA is certain that the proposed language, as currently written, will further confuse the public-at-large, as well as the hundreds of thousands of Pennsylvanians who regularly seek chiropractic care. As such, the proposed language, while very well-intended, does not serve the public's interest and should be withdrawn.

In accordance with the original intent of the proposed language, the ICA recommends that the State Board of Chiropractic promptly draft and submit a revised proposal, designed to protect consumers of chiropractic services who can be confused by "specialty advertising" that does not accurately reflect advanced knowledge, training or skill, while still honoring the unique abilities of Doctors of Chiropractic. ICA urges that this amended rule be appropriately inclusive of all programs that meet the basic high standards that such programs should meet.

Thank you for your consideration of the ICA's opposition to the proposed regulation.

Respectfully,

A handwritten signature in black ink that reads "George B. Curry".

George B. Curry, DC, FICA  
President