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March 26, 2018

RECEIVED  
IRRC  
2018 APR - 3 A 9 58

The Honorable George D. Bedwick, Chairman

Independent Regulatory Review Commission

Harrisburg, PA 17101

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

Dear Chairman Bedwick:

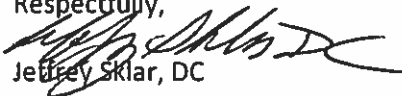
My name is Jeffrey Sklar, DC. I have been exclusively treating cancer patients at Cancer Treatment Centers of America in Philadelphia for the last 9 years. I am on the Medical Executive Committee and have the title of Medical Director of Chiropractic Services. Additionally, I am on the PCA Board of Directors. I do not support the proposed regulation change to Chiropractic Specialties, 49 Pa. Code, Chapter 5 (16A-4312).

Although, I do not personally advertise as an employee at CTCA, my chiropractic work with cancer patients whom I have been immersed for close to a decade is unique and does require special skills for this population. However, there is no diplomate or certification currently available. In this regard, I believe the IRRC lacks clear, comprehensive and inclusive language that should govern Chiropractic specialty advertising. Furthermore, I believe 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.

In accordance with the original intent of the proposed language, the I believe the State Board of Chiropractic should 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.

Thank you for your consideration of my comments in opposition to the proposed regulation.

Respectfully,



Jeffrey Sklar, DC

Director Eastern Region Director Chiropractic Services

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