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2018 MAR -1 P 3:39

February 27, 2018

The Honorable George D. Bedwick, Chairman
Independent Regulatory Review Commission
14th Floor, Harrisburg 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:

After extensive discussion and careful consideration, the Pennsylvania Chiropractic Association (PCA), representing the interests of Pennsylvania's 4,000+ licensed Doctors of Chiropractic, **DOES NOT SUPPORT** the proposed regulation change to Chiropractic Specialties, 49 Pa. Code, Chapter 5 (16A-4312).

The PCA has concluded that the proposed regulation before the IRRC lacks clear, comprehensive and inclusive language that should govern Chiropractic specialty advertising. Also, PCA 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.

In accordance with the original intent of the proposed language, the PCA 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.

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

Respectfully,

A handwritten signature in dark ink, appearing to read 'RJB', with a stylized flourish at the end.

Raymond J. Benedetto, DC, DACNB
President