

The International Academy of Chiropractic Neurology

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March 16, 2018

Joseph G. Halloran, D.C., Chair
Examining Board Members
Pennsylvania State Board of Chiropractic
P.O. Box 2649, Harrisburg, PA 17105-2649

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Regarding: Proposed Regulatory Language for Recognizing Chiropractic Specialties

Dear Board Members,

At the outset I would like to thank you for your work on behalf of our great profession. I know how much time and energy is put forth by our examining boards on a regular basis, and how arduous this can be at times.

It has come to the attention of the International Academy of Chiropractic Neurology (IACN) that language proposed to be adopted by your Examining Board may adversely and unfairly affect the citizenry of Pennsylvania as well as licensed Doctors of Chiropractic in the state. It is our understanding that new board language may exclude Chiropractic Neurologists and Clinical Neurophysiologists recognized by the IACN.

The IACN respectfully requests that the Pennsylvania State Board of Chiropractic should not adopt such language.

As a background, The IACN is an apolitical organization, established for quality in the chiropractic specialty of neurology. In order to keep academics and politics separate, the IACN is deliberately NOT affiliated with chiropractic political trade organizations such as the American Chiropractic Association (ACA) and International Chiropractic Association (ICA), or for-profit so-called "Institutes", but its educational programs are instead affiliated with Chiropractic Colleges recognized by the Council on Chiropractic Education (CCE). The following statement is taken from one of our eligibility standards publications.

"IACN is a voluntary professional association and a 501(c)(6) nonprofit corporation... (it) functions to guide Member Chiropractic Specialty Examining Boards in accordance with the objectives of the National Commission for Certifying Agencies (NCCA) Standards for the Accreditation of Certification Programs, as well as serve as

a Credentials Verification Organization (CVO) in accordance with the objectives of the National Committee for Quality Assurance (NCQA)."

Without Pennsylvania State Board of Chiropractic recognition of the IACN, the result will be that ***graduates of CCE College sponsored Neurology Diplomate Programs will not be eligible to be recognized in your great state.*** These physicians will be stripped of their privilege of displaying their substantive achievement to their patients. Similarly, the citizenry of Pennsylvania would not be alerted to the diplomate status, and therefore would be unable to avail themselves of these duly qualified doctors of chiropractic.

Historically, the IACN is an outgrowth of the ACA's original neurology board known as the "American Chiropractic Academy of Neurology (ACAN)". This board was disbanded by the ACA in 1994 and replaced by the American Chiropractic Neurology Board (ACNB). Eventually, it was the former ACAN examining board members who joined to form an apolitical organization (the IACN). The IACN is a non-profit educational organization founded in 1997 under 504A of the Iowa Code. The IACN currently serves over 200 members.

The IACN is a leader in the use of sound test psychometry in all parts of the examination process. In its over 20 year lifespan, the IACN has accomplished many firsts in chiropractic specialty education. The IACN board members were the first chiropractic neurology organization to employ the National Board of Chiropractic Examiners (NBCE) and Professional Evaluation Services (PES), to assist in test development. The IACN was also the first chiropractic neurology organization to join the National Organization for Competency Assurance (NOCA), develop subspecialty certification in electrodiagnosis, have multiple specialty boards examine together and have a national meeting for all chiropractic neurologists. The State of Florida specifically lists the IACN as a diplomate granting authority. The Iowa Board of Chiropractic Examiners lists the IACN as preferred for neurological training when performing electrodiagnosis.

While the intention of the proposed language may be to protect the Pennsylvania Citizenry, the IACN contends that the new language will have exactly the opposite effect. The IACN believes that removal of recognition represents an unfounded and prejudicial policy, which, under scrutiny, fails to either protect the citizenry of Pennsylvania or establish a reasonable quality standard for chiropractic neurologists. Additionally, it places an unfair burden and a financial hardship upon some of our most well credentialed and scholarly clinicians and academicians. Finally, it may have a chilling effect on CCE Accredited Chiropractic College Diplomate Programs and other classes.

Please be mindful of the logic, legality, and measurement (or standard) your board is relying upon when it endorses defacto recognition of chiropractic specialties endorsed by the ACA or ICA. Precisely how did this issue come to your board? Was there a complaint against an IACN Diplomate Physician? What problem is being addressed here? In 2015, The Supreme Court of the United States ruled (6-3) that North Carolina State Board of Dental Examiners could be personally subject to antitrust claims because

members of the profession it regulates also sit on the board. The court cited “unfair methods of competition and deceptive acts and practices in commerce”

In summary the IACN is asking the Pennsylvania State Board of Chiropractic to recognize those doctors who have been awarded diplomates by IACN examining boards for the following reasons:

1. All CCE College Neurology Diplomate Programs use the IACN testing boards and not the ACA “recognized” board.
2. IACN uses only valid psychometry in test preparation and post-test analysis.
3. Other states (to IACN knowledge) recognize IACN, including Florida and Iowa that reference IACN by name.
4. Graduates of CCE Accredited Chiropractic College Neurology Diplomate Programs are actually ineligible for recognition by the ACA “recognized board”.

In closing, the IACN believes that its diplomates have clearly demonstrated superior academic qualifications, are a credit to the chiropractic profession, a valuable resource for the residents of Pennsylvania and should certainly be included and recognized by the Pennsylvania State Board of Chiropractic.

On behalf of the IACN please accept our most sincere thanks for addressing this matter. The IACN stands ready to assist the Pennsylvania State Board of Chiropractic in any way and hopes that the Pennsylvania State Board of Chiropractic will have the foresight to recognize and rectify the inequity of this situation.

Sincerely,

A handwritten signature in black ink, reading "Joseph S. Ferezy, DC". The signature is fluid and cursive, with the first name "Joseph" being the most prominent.

Joseph S. Ferezy, DC
President, IACN